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

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Executive Summary

- Surrey County Council is preparing a new local plan for waste which will set out a framework for development of waste management facilities in the county. The SWLP will allocate suitable sites for waste facilities and its policies will be used to determine planning applications concerning the management of waste including proposals for new waste facilities.

- The new Surrey Waste Local Plan (SWLP) will cover the period up until 2033 and will include policies and plans intended to ensure that waste is managed sustainably by ensuring sufficient land is available to deliver the facilities required to meet the identified need for waste management in Surrey. The SWLP considers how all types of waste should be managed and takes account of national and local policies for waste management.

- Between 2 September and 25 November 2016 Surrey County Council consulted on an Issues and Options Paper and a number of supporting documents. The Issues and Options Consultation set out the strategic context for waste management and it explored the overall scale of additional waste management facilities likely to be needed in Surrey during the plan period. It was the first formal opportunity for stakeholders to contribute to the new SWLP.

- The Council is now at a stage where the ‘Preferred Options’ for managing waste to 2033 have been identified and the Vision and Strategic Objectives have been refined in response to comments from stakeholders. This Preferred Options Report sets out how options have been assessed and how they have been taken into account in preparing the new SWLP.

- This document has been published to accompany the public consultation on a draft version of the Surrey Waste Local Plan between 6 November 2017 and 7 February 2018. The draft SWLP can be viewed and downloaded at the following website: www.surreycc.gov.uk/newwasteplan
1 Introduction

1.1 Purpose of the Waste Local Plan

1.1.1 Waste is generated by Surrey's homes and businesses and Surrey County Council needs to ensure that sufficient land is available for waste facilities to be built to manage it. It is also 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 working towards sending zero waste to landfill.

1.1.2 As the Waste Planning Authority (WPA), Surrey County Council is required to produce a Waste Local Plan to show how and where Surrey's waste will be managed. The SWLP sets out the planning framework for the development of waste management facilities and is used in determining planning applications for such facilities. Essentially, the SWLP is intended to ensure that waste management facilities are developed of the right type, in the right place and at the right time.

1.1.3 It is essential that the Waste Local Plan is kept up to date to provide a robust and relevant policy framework to support the sustainable management of waste. The existing Plan (known as the Surrey Waste Plan) is now nearly ten years old. The replacement plan, known as the Surrey Waste Local Plan (SWLP), will cover the period from 2018 to 2033 and help ensure that sufficient waste management capacity will continue to be provided to ensure waste is managed in Surrey in the most sustainable way.

1.2 Preparing the new Surrey Waste Local Plan

1.2.1 There are several stages in preparing the new SWLP, many of which offer opportunities for residents, businesses and other key stakeholders to comment. The current version of the SWLP is a draft plan, subject to public consultation between 1 November 2017 and 5 February 2018, and is the second stage of consultation.

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1 The process is governed by regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012

2 In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
1.3 Purpose of the Preferred Options Report

1.3.1 The ‘Preferred Options’ are those options which are considered to offer the best practicable solutions to the sustainable management of waste in Surrey. This report sets out how options that have been assessed to identify the ‘Preferred Options’. The report summarises comments provided by stakeholders on various options during the first stage of consultation, and shows how these comments have been used to decide which are the Preferred Options and how these have been taken into account in preparing the new SWLP and in particular the overarching spatial strategy which will guide waste development.
2 Background

2.1 Issues and Options Consultation

2.1.1 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 SWLP. The consultation was designed to help establish what issues the SWLP needs to address and the options (or solutions) available for addressing these issues. Documentation associated with the first consultation on ‘Issues and Options’ can be viewed at the following website: www.surreycc.gov.uk/newwasteplan.

2.1.2 The next stage is to consult on a draft version of the new SWLP which will include specific policies and plans, and strategic site allocations designed to implement the Preferred Options set out in this report. The consultation is taking place between 6 November 2017 and 5 February 2018.

2.2 Summary of Key Policies and Frameworks

Waste Framework Directive

2.2.1 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, reduction, at the top of hierarchy, and the least, disposal, at the bottom.

![Waste Hierarchy Diagram]

*Figure 2 Waste Hierarchy*
National Planning Policy Framework (NPPF) 2012

2.2.2 In 2012 the Government replaced the former national planning policy guidance and statements with a single document, the National Planning Policy Framework (NPPF). The NPPF is supported by the national Planning Practice Guidance (nPPG), which was introduced from March 2014. The NPPG replaces guidance notes that previously supported the former planning policy statements.

2.2.3 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

2.2.4 The National Planning Policy for Waste (NPPW) 2014 sets out the government’s ambition to work towards a more sustainable approach for resource management and use.

Waste Management Plan for England 2013

2.2.5 The Government published a new 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.

Surrey Waste Plan 2008

2.2.6 The current local plan for waste, the Surrey Waste Plan (SWP) was adopted in 2008. The SWP 2008 sets out the planning framework for the development of waste management facilities in Surrey. The SWP 2008 includes both policies and allocated sites to support waste development in Surrey.
Minerals and Waste Development Scheme

2.2.7 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 website³.

Joint Municipal Waste Management Strategy

2.2.8 The 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.

2.2.9 Implementation of the JMWMS is the responsibility of the Surrey County Council Waste Disposal Authority as well as the District and Borough Council Waste Collection Authorities.

Local Transport Plan

2.2.10 The Surrey Local Transport Plan (STP) aims to enable residents and businesses to meet their transport and travel needs effectively, reliably, safely and sustainably. It recognises the role that transport systems play in promoting a vibrant economy. The STP was most recently updated in 2016.

3 Developing the Draft Vision and Objectives

3.1 Vision

3.1.1 The draft SWLP includes a draft Vision that sets out how waste would be managed in Surrey throughout the plan period if all the relevant issues were addressed. The Vision needs to be positive and ambitious but also achievable and the Strategic Objectives support the Vision by outlining what needs to be achieved if the Vision is to become reality.

3.1.2 The Council set out its initial draft Vision in the previous Issues and Options consultation (September to November 2016). In light of the responses received during the Issues and Options Consultation the draft Vision was reviewed and amended. The reasoning and the amended text are set out in Table 1.
Table 1 Changes to the draft Vision following Issues and Options Consultation

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<thead>
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| The role that the Surrey Waste Local Plan should play in implementing the Waste Framework Directive (2008/98/EC) in England:  
- Article 4: Waste Hierarchy  
- Article 13: Protection of human health and the environment  
- Article 16: Principles of proximity and self-sufficiency | The Draft Vision which was published in the Issues and Options consultation was: “Our vision is for Surrey to be truly sustainable in waste management. That means managing waste in facilities within the county which will be provided in the right locations at the right time so that communities and businesses can take ownership of the waste they produce. By 2033 there will be no landfill of waste. The facilities will help maximise the resource potential of waste, ensuring it is managed in line with the waste hierarchy’s aim of extracting the maximum benefit from a waste material by reusing, recycling or recovering energy from it. Technology and processes will be in place to ensure the production of waste has reduced while management development will maximise economic, social and environmental benefits and avoid adverse impacts on local communities and the environment.” Responses to the Issues and Options Consultation highlighted the following:  
- The vision is too long and complicated. | Implementation:  
The revised wording to be included in a draft plan consultation is as follows: Revised Draft Vision  
Surrey County Council’s response:  
- To provide a vision which is succinct but supports the sustainable management of waste.  
- To provide a vision which limits the amount of ‘jargon’.  
- To consider how, as the WPA, we will address the need for landfill.  
To provide a vision which addresses the key issues which are important for our residents. The revised wording to be included in a draft plan consultation is as follows: “To enable sufficient waste management capacity to  
Justification:  
The Waste Framework Directive (WFD) is the overarching European legislation with regards to waste. This legislation informs national policies and strategies including the NPPW (2014) and Waste Management Plan for England (2013). The vision has been distilled down to what is considered the most important aspects of achieving sustainable waste management. The WFD includes the requirement for plans to promote sustainable management of waste through the waste hierarchy. The waste hierarchy promotes the prevention of waste in the first instance and where this is not possible the reuse, recycling and recovery of materials. Landfill is the least preferred option for managing waste and is at the bottom of the waste hierarchy. This key principle is seen as necessary in any vision for a new SWLP. The waste hierarchy is supported by other national policy and strategy documents. Article 13 of the WFD for the protection of human health and the environment requires that waste management is carried out without endangering human health or harming the environment. Surrey’s natural and historic environment are important to our community and the WPA seeks to
### Initial Considerations

Hierarchy (nPPG for waste, Paragraph 011 Reference ID, 28-011-20141016).

Local planning authorities should positively seek opportunities to meet the development needs of their area (NPPF, Paragraph 14). The new SWLP should support this by:

- Building a competitive economy.
- Providing an accessible local services that reflect local need.
- Seeking to protect and enhance our natural.
- Reduce waste and pollution, and using natural resources prudently.
- Mitigating climate change and supporting a transition to the low carbon economy.

### Issues and Options Consultation

- The language in the vision contains jargon. The vision is confusing or not clear.
- Zero waste to landfill is not achievable. There is always a (small) proportion of waste which must be sent to landfill. This target is inappropriate for the vision.
- There is a need to consider economic, social and environmental aspects of sustainable development.
- Generally support the positive approach outlined in the vision.
- Generally support the sustainable waste management advocated in the vision.

### Implementation

- 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."

### Justification

- Support this by recognising the benefits of this environment. The Surrey County Council corporate strategy recognises the role that the county council provides in maintaining and improving the wellbeing of residents in Surrey. The protection of human health and the environment is also essential in the vision for the sustainable waste management in Surrey.

- Article 16 of the WFD sets out the principles of proximity and net self-sufficiency. In order to achieve net self-sufficiency the SWLP will seek to allocate sufficient sites to meet the identified need. These sites should provide a suitable network of facilities to deliver sustainable waste management during the plan period.

- We recognise that there will be a balance to be struck between these different aspects of the vision e.g. protection of human health and the environment and allocating sites for development to meet Surrey’s need for waste management. This will be part of the challenge for the sustainable management of waste in Surrey during the life of the SWLP.
### 3.2 Strategic Objectives

#### 3.2.1 Eight initial draft Strategic Objectives were identified and these were published alongside the draft Vision during the Issues and Options Consultation. Consultation responses were generally supportive of the draft Strategic Objectives with some providing ideas for improvement and, again, noting a need for greater emphasis on environmental conservation and enhancement which was key to residents.

3.2.2 A detailed analysis of how the comments have been taken into account in revising the Strategic Objectives is set in Table 2.

<table>
<thead>
<tr>
<th>Initial Considerations</th>
<th>Issues and Options Consultation</th>
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<th>Justification</th>
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<tbody>
<tr>
<td>Objective 1: To increase the sustainable management of waste through waste prevention, re-use, recycling and recovery.</td>
<td>The relevant draft objective which was published in the Issues and Options consultation was:</td>
<td>Surrey County Council’s response:</td>
<td>The draft vision is focused on the waste hierarchy and implementing this through the SWLP.</td>
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<tr>
<td>Article 4 of the EU Waste Framework Directive (2008/98/EC) includes the requirement for waste planning authorities to consider the Waste Hierarchy when planning for the management of waste. The waste hierarchy has been transposed into UK law through the Waste (England and Wales) Regulations 2011.</td>
<td>Objective 1: To increase the sustainable management of waste through waste prevention, re-use, recycling and recovery. Responses to the Issues and Options Consultation highlighted the following:</td>
<td>• To highlight the ongoing need for landfill to manage waste which cannot be dealt with in any other way a specific objective for landfill should be included.</td>
<td>Prevention of waste is at the top of the waste hierarchy. The wording in the revised objectives reflects the fact that the WPA cannot reasonably take direct action to prevent waste, however, the WPA will support those projects and programmes which do support a reduction in waste arisings.</td>
</tr>
<tr>
<td>“In preparing Local Plans, waste planning authorities should … drive waste management up the waste hierarchy (Appendix A), recognising the need for a mix of types and scale of facilities” (NPPW, Paragraph 3).</td>
<td>• The retention of landfill capacity in Surrey still may still be required as:</td>
<td>• The objectives should continue to promote the sustainable management of waste by encouraging waste treatment higher up on the waste hierarchy.</td>
<td>The two proposed new objectives demonstrate conformity with the waste hierarchy by encouraging the sustainable management of waste. The objective related to the recycling, recovery and composting seeks to align with the JMWMS for managing waste from households.</td>
</tr>
<tr>
<td>The national Waste Management Plan for England 2011 also states that the local planning authority must have regard to the waste hierarchy in preparing their local plans.</td>
<td>o There is always a small proportion of waste which cannot be dealt with by other treatment</td>
<td>The revised wording to be included in a draft plan consultation is as follows:</td>
<td>Strategic Objective #</td>
</tr>
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<td></td>
<td>o There is a need for flexibility in how we manage Surrey’s waste (contingency)</td>
<td>Strategic Objective #</td>
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</table>
### Initial Considerations

The JMWMS sets out how the county council and the 11 district and borough councils will work together to manage Surrey’s waste. This strategy sets targets for the recycling and recovery of waste from households and other actions which support the sustainable management of waste.

### Issues and Options Consultation

- Support for managing waste higher up on the waste hierarchy.
- Objectives should recognise the need for recovery of inert materials to restore old mineral workings.

### Implementation

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

#### Strategic Objective #

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.

### Justification

The objective related to landfill demonstrates conformity with the waste hierarchy which sees disposal as the least preferred option for waste management and an option of last resort.

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


“In preparing their Local Plans, waste planning authorities should … work jointly and collaboratively with other planning authorities to collect and share data and information on waste arisings, and take account of… waste arisings across neighbouring waste planning authority areas” (NPPW, Paragraph 2).

“Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of

The relevant draft objective which was published in the Issues and Options consultation was:

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

Responses to the Issues and Options Consultation highlighted the following:

- The meaning of the phrase ‘need for communities and businesses to take responsibility’ is unclear.

Surrey County Council’s response:

- To make sure the draft objective is easily understood the technical terminology, which is in the legislation, will be used in the objective.

The revised wording to be included in a draft plan consultation is as follows:

#### Strategic Objective #

To make sure enough waste management capacity is provided to manage the equivalent amount of waste produced in Surrey.

The principles of net self-sufficiency and proximity are a key part of the draft vision. Detail on these principles set out in the WFD, the NPPW and the nPPG for waste.

The policy framework highlight the need to provide sufficient opportunities to meet the identified need for waste management in Surrey.

This requirement is not limited to waste from household but covers all waste streams. The proposed strategic objective supports this aspect of the draft vision and complies with national policy.
## Initial Considerations

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<td>their area for the management of waste streams” (NPPW, Paragraph 3). 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. As a result it is important that Surrey’s businesses and residents recognise the amount of waste that they produce and support the need for facilities to manage the equivalent amount of waste.</td>
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### Objective 3: To ensure new waste management facilities are developed in suitable locations

The relevant draft objective which was published in the Issues and Options consultation was:

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

There were no responses to the Issues and Options Consultation on this draft objective.

Surrey County Council’s response:

- On review Surrey County Council recognises the role of plan which is to guide development to the most sustainable locations. A minor change of wording could reflect this role more accurately.

The revised wording to be included in a draft plan consultation is as follows:

**Strategic Objective #**

To direct new facilities to locations that have been identified as suitable for waste development.

This objective supports the role of the SWLP in allocating sites and identifying suitable locational criteria to guide waste development.

This objective supports the third part of the vision which seeks to protect human health and the environment, as by locating facilities in the best available locations the SWLP can avoid potential adverse impacts on communities and the environment.

This is strongly supported in national policy through the NPPW, NPPF and nPPG for waste.
### Initial Considerations

using land that has been previously developed (brownfield land)” (NPPF, Paragraph 111).

“Waste planning authorities must include in their Local Plans … Sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations” (NPPG for waste, Paragraph 014 Reference ID, 28-014-20141016).

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 adverse impacts on the environment.

### Issues and Options Consultation

The relevant draft objective which was published in the Issues and Options consultation was:

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

Responses to the Issues and Options Consultation highlighted the following:

- Surrey County Council’s response:
  - To make clear how the WPA will make best use of land and how existing sites can be supported additional wording has been added.

The revised wording to be included in a draft plan consultation is as follows:

Strategic Objective #

This proposed objective supports the need, as outlined in national policy, to look at a range of opportunities to provide development of waste management facilities in Surrey.

In addition, it recognises the constraints which it is believed exist in Surrey with respect to competition for available land.

In order to be able to achieve our aim of being net self-sufficient the WPA

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<tr>
<td>using land that has been previously developed (brownfield land)” (NPPF, Paragraph 111).</td>
<td>The relevant draft objective which was published in the Issues and Options consultation was: Objective 4: To make best use of land when managing waste. Responses to the Issues and Options Consultation highlighted the following: Surrey County Council’s response: - To make clear how the WPA will make best use of land and how existing sites can be supported additional wording has been added. The revised wording to be included in a draft plan consultation is as follows: Strategic Objective #</td>
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### Initial Considerations

“complementary activities” *(NPPW, Paragraph 4).*

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.

### Issues and Options Consultation

- The need to consider maintaining existing sites where they are consistent with the vision and objectives.

### Implementation

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

### Justification

will need to investigate a range of options for meeting the identified need for waste management facilities in Surrey.

By making best use of land the WPA also hopes to minimise impacts to Surrey’s communities and the environment.

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Objective 5: To maximise the economic benefits of waste management. AND

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

“...consider the suitable siting of [a low carbon energy recovery facility] to enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers” *(NPPW, Paragraph 4).*

“...design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily” *(NPPF, Paragraph 97).*

“The relevant draft objectives which was published in the Issues and Options consultation were:

- Objective 5: To maximise the economic benefits of waste management.
- Objective 6: To encourage innovation and new technologies which provide opportunities to minimise the impact of waste development on communities and businesses.

Responses to the Issues and Options Consultation highlighted the following:

- There is a need to carefully consider balancing the economic, social and environmental benefits of waste management.

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<th>Surrey County Council’s response:</th>
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<tr>
<td>To support an approach which balances the economic, environmental and social aspects of sustainable development the two objectives have been combined so that environmental and social factors are considered alongside economic benefits.</td>
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<tr>
<td>The revised wording to be included in a draft plan consultation is as follows:</td>
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| In line with the draft Vision the proposed objective seeks to support sustainable waste management and minimise the impacts on the environment by encouraging more efficient, cleaner technologies. |
| This objective also recognises the growing movement for a circular economy and the desire to encourage re-use and recycling. Finally, this objective also recognises the changing nature of technologies for dealing with waste and is positively prepared to anticipate changing technologies – whatever these may be. |
## Initial Considerations

would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously” (NPPF, Paragraph 143).

The European Commission’s Circular Economy Package to encourage waste reduction and encourage re-use and recycling. In particular, this package promotes industrial symbiosis by turning one industry’s by-product into another industry’s raw material. It is proposed that this would bring benefits for both the environment and the economy.

In addition the changing policy the technology for managing waste is rapidly improving and many new types of technologies or smaller, more efficient technologies with a lower environmental impact are being developed.

### Issues and Options Consultation

- There is not enough emphasis on environmental conservation and enhancement.
- The economic aspects of waste management may have an impact on the implementation of other waste strategies.
- The economic aspect of sustainable development seems to be given greater weight than other aspects of sustainable development.
- Clear mechanism or criteria are needed for how economic benefits of that waste management will be shared with those communities

### Implementation

Strategic Objective #

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

### Justification

<table>
<thead>
<tr>
<th>Objective 7: To support the reduction of greenhouse gas emissions through sustainable management of waste. AND</th>
<th>Objective 8: To make sure movement of waste is as sustainable as possible, and movement by road is kept to a minimum.</th>
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<tr>
<td>“Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against … the capacity of existing and potential transport infrastructure to support the sustainable movement of waste” (NPPW, Paragraph 5).</td>
<td>The relevant draft objectives which was published in the Issues and Options consultation were: Objective 7: To support the reduction of greenhouse gas emissions through sustainable management of waste.</td>
</tr>
<tr>
<td>Surrey County Council’s response: The waste hierarchy and sustainable waste management have been addressed through other objectives in the proposed draft plan.</td>
<td>The proposed objective is compliant with national policy by promoting development which includes options for sustainable transport and those methods of transport other than by road. However, in Surrey there are only limited options for alternative</td>
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<td>Initial Considerations</td>
<td>Issues and Options Consultation</td>
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| “Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised” (NPPF, Paragraph 34). | Objective 8: To make sure movement of waste is as sustainable as possible, and movement by road is kept to a minimum. Responses to the Issues and Options Consultation highlighted the following:  
- Objective 7 and Objective 8 could be combined.  
- Objective 8 may be difficult to achieve due to the nature of waste transportation and the type(s) of waste that can be processed at each site, particularly in relation to specialist facilities. | • A single objective could be used to cover those aspects of sustainable development related to transport.  
• Given the difficulties in alternative forms of transport in Surrey the objective should be worded in a way that supports sustainable transport options but recognises the continued need for road movements.  
The revised wording to be included in a draft plan consultation is as follows:  
Strategic Objective #  
To keep waste movement by road to minimum practicable levels and support options for sustainable transport. | transport and so emphasis is also made on minimising movements by road to reduce emissions and to avoid adverse impacts on communities. |
| “All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment” (NPPF, Paragraph 32).  
“The siting of waste management facilities will be driven by a number of issues including…suitability of local transport infrastructure and availability of sustainable transport methods” (NPPG for waste Paragraph 037 Reference ID, 28-037-20141016). | | | |
| The Surrey Local Transport Plan (STP) supports development which is planned in a sustainable way or which will provide the mitigation to address impacts arising from movement related to these developments. | Proposed Additional Objective: To work closely with our partners such as Surrey Waste Partnership, District and Borough councils and other Waste Planning Authorities. | | |
| “In preparing their Local Plans, waste planning authorities should … work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable | There was no relevant draft objective published in the Issues and Options consultation. Responses to the Issues and Options Consultation highlighted the following: | Surrey County Council’s response:  
• There is a need to work with partners in order to successfully implement a new waste plan. | The county council recognises that partnership working is key to delivering the outcomes of the SWLP. This includes working with other authorities in preparing the SWLP and during implementation. |
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<th>Issues and Options Consultation</th>
<th>Implementation</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Network of facilities to deliver sustainable waste management” (NPPW, Paragraph 3).</td>
<td>Need to work with partners e.g. Waste Disposal Authority, Local Planning Authorities, Other Waste Planning Authorities, Heritage, Conservation, Landscape, Ecology teams and others to achieve these objectives.</td>
<td>An objective related to partnership working would support Surrey’s corporate strategy.</td>
<td>Not only is this a requirement through the Duty to Cooperate but it is also part of the Surrey Corporate Strategy which recognises the role of Surrey’s partners in achieving the best outcomes for residents.</td>
</tr>
<tr>
<td>Waste is a strategic issue which can be addressed effectively through close cooperation between waste planning authorities and other local planning authorities” (nPPG for waste, Paragraph 015 Reference ID, 28-015-20141016).</td>
<td>There is a need to ensure that waste development is considered alongside other spatial planning concerns such as the need for housing and employment land.</td>
<td>An objective related to partnership working could help support other monitoring of cooperation e.g. Duty to Cooperate.</td>
<td>In addition to working with partners such as Surrey Waste Partnership, District and Borough councils and other Waste Planning Authorities there is also a need to work with residents. The Surrey SCI sets out how we will consult residents on planning applications and preparing local plans.</td>
</tr>
<tr>
<td>The JMWMS sets out how the county council and the 11 district and borough councils will work together to manage Surrey’s waste. This strategy works with the waste local plan to encourage reuse, recycling and recovery of household waste.</td>
<td>The plan should also recognise the positive contribution that waste management can bring to the development of sustainable communities by considering waste development alongside other forms of development.</td>
<td>The revised wording to be included in a draft plan consultation is as follows:</td>
<td>The WPA used a high level Issues and Options Consultation to make sure that residents had a say as early in the process for preparing a new SWLP as possible.</td>
</tr>
<tr>
<td>For planning, existing working groups and Memoranda of Understanding (MoU) support the cooperation between Surrey County Council and its districts and boroughs and Surrey County Council and other adjoining authorities e.g. PWG, SEWPAG.</td>
<td></td>
<td>Strategic Objective #</td>
<td>The updated validation checklist also requires applicants to submit a statement of community involvement to demonstrate early engagement with residents for new development.</td>
</tr>
<tr>
<td>“In preparing Local Plans, waste planning authorities should, undertake early and meaningful engagement with local communities” (NPPW, Paragraph 3).</td>
<td></td>
<td>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.</td>
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<tr>
<td>“It is important that waste planning authorities engage and collaborate with local communities in an early and meaningful way when identifying options for managing waste” (nPPG for waste,</td>
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<tr>
<td>Initial Considerations</td>
<td>Issues and Options Consultation</td>
<td>Implementation</td>
<td>Justification</td>
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<td>Paragraph 012 Reference ID, 28-012-20141016.</td>
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</table>
3.3 Options for achieving the Strategic Objectives

3.3.1 The Spatial Strategy sets how the Strategic Objectives are proposed to be met within the spatial context of Surrey. A number of alternative options were set out in the Issues and Options Consultation which would enable the draft objectives to be met. The choice of some options as ‘Preferred’ has resulted in other options being discounted from further consideration.

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

<table>
<thead>
<tr>
<th>Consideration of relevant policy context</th>
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<tbody>
<tr>
<td>In preparing their Local Plans, waste planning authorities should … work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management (NPPW, Paragraph 3).</td>
<td>The NPPF states that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. Strategic priorities include the delivery of infrastructure such as waste development. This option is compliant with national policy.</td>
<td>Option 1A Work with our stakeholders to support initiatives that help meet local targets for prevention, re-use, recycling and recovery.</td>
<td>Support working with stakeholders to achieve targets. No comment on deliverability.</td>
<td>Supported.</td>
</tr>
<tr>
<td>[Non-waste planning authorities] must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy (nPPG for waste, Paragraph 010 Reference ID, 28-010-20141016)</td>
<td>The WPA recognises that they would be unable to deliver new facilities without the support of partners including district and borough councils. To support the deliverability of the SWLP there is a need to work together to deliver the draft Vision. The JMWMS is a good starting point for working with district and boroughs and supports meeting this option.</td>
<td></td>
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<tr>
<td>Waste is a strategic issue which can be addressed effectively through close co-operation between waste planning authorities and other local planning authorities (nPPG for waste, Paragraph 015 Reference ID, 28-015-20141016). The JMWMS sets out how the county council and the 11 district and borough</td>
<td>The WPA should promote sustainable management of waste by encouraging prevention, reuse, recycling and recovery. This option is compliant with requirements of the EU and national policy.</td>
<td>Option 1B Prioritise development of facilities which allow management of waste further up the waste</td>
<td>Recognition of the need to prioritise the management of waste by preventing it from occurring in the first place. No comment on deliverability.</td>
<td>Supported.</td>
</tr>
<tr>
<td>Consideration of relevant policy context</td>
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<tr>
<td>councils will work together to manage Surrey’s waste.</td>
<td>Based on the waste hierarchy, a key objective of government policy is to reduce the level of waste going to landfill by encouraging recycling. Landfill is the least desirable option because of the many potential adverse impacts it can have. The WFD considers disposal activities such as landfill as valid method of waste management but one which should be an option of last resort. This option is policy compliant.</td>
<td>Option 1C</td>
<td>Recognition that landfill may still be required in some circumstances as a contingency measure. Not enough information on how the county council intend to plan for landfill to fully support this option. No comment on deliverability.</td>
<td>Supported. Need for more information.</td>
</tr>
<tr>
<td>This option goes beyond what is required by the EU and national policy. Even with the most efficient systems in place, some materials are inevitably sent to landfill as this is the most practical way to deal with these materials e.g. hazardous waste. Management of waste from households in Surrey had a diversion rate from landfill of 94% in 2015/16. Recent trends show that the amount of waste sent to landfill has continued to decrease. However, for Commercial &amp; Industrial (C&amp;I) waste a large proportion, approximately 20% in 2015/16, was sent to landfill. Therefore, for C &amp; I waste achieving zero</td>
<td>Option 1D</td>
<td>Although the aspiration is supported, respondents were unconvinced that this is realistic. Consideration should be given to similar policies in other minerals and waste local plans e.g. Policy WMP8a of the East Sussex and Brighton &amp; Hove Waste and Minerals Plan, which provides a contingency in the case of a speculative application. It would be necessary to allow for the recovery of waste to enable the appropriate restoration of mineral workings and that this</td>
<td>Not Supported.</td>
<td></td>
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<tr>
<td>Consideration of relevant policy context</td>
<td>Other initial considerations</td>
<td>Consultation option</td>
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<tr>
<td>waste to landfill by the end of 2033 may be too difficult a task. For Construction, Demolition and Excavation (C, D, &amp;E) waste sent to landfill was nearly 40% of total arisings in 2015/16. Although, it is noted that some of this waste is used to restore old mineral workings and could be considered a 'recovery' operation. Therefore, it may be difficult to achieve zero waste to landfill for this waste stream. As a result this option may not be deliverable.</td>
<td></td>
<td>needs to be clear when considering waste sent to landfill. Responses indicated a need for flexibility through providing a range of waste management technologies including landfill. It was noted that there are only limited landfill facilities in the South East. As a result there is a need to safeguard landfill capacity and make best use of existing capacity. Comments on deliverability challenged the practicality of implementing this option.</td>
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</table>

Initial Conclusion:

3.3.2 There is general support for options which involve developing facilities which would result in waste being managed further up the waste hierarchy. There is support for the elimination of landfill as an aspiration. However, doubt is expressed regarding the deliverability of a zero waste to landfill scenario which would see the complete elimination of landfill as a method of managing waste.

3.3.3 The response from a sewerage undertaker highlighted the need for a specific policy to deal with wastewater treatment works. This will be implemented through an appropriate policy in the draft version of the SWLP.

3.3.4 It is proposed that the Preferred Options (PO) for meeting this objective are as follows:

- **PO1**: The 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.
• **PO2**: The council will need to provide policies which support reuse, recycling and recovery. This includes a preference for recycling over recovery (which includes the use of waste as a fuel) whilst recognising that landfill still needs to be planned for but only as a last resort.

• **PO3**: The replacement of primary materials with suitable inert waste in engineering applications, including the infilling of mineral workings, will be supported.

3.3.5 It was also commented by one wastewater operator that a specific policy for wastewater treatment works should be included to meet the need for this type of development, for example where there is a need in the network to support new development and growth.

• **PO4**: The inclusion of a specific policy to deal with wastewater treatment works would support development of new facilities or improvement of existing facilities to meet an identified need.

**Implementation:**

3.3.6 The practicalities of achieving zero waste to landfill are noted and, where this is not possible for certain waste types, the Council will seek maximum practicable diversion of waste from landfill by the end of the plan period. Appropriate targets for each waste stream will be used in the Waste Needs Assessment and included in draft policies or supporting text to support meet targets for prevention, re-use, recycling and recovery of waste. The Vision has been updated to reflect an adjusted position on landfill.

3.3.7 In order to implement the Preferred Options it has been identified that the following policies could be required:

• *Operations for Recycling and Recovery*

• *Operations for Recycling of Construction, Demolition and Excavation Waste (including sustainable construction)*

• *Operations for Recovery of Inert Waste to Land*

• *Need for wastewater treatment works in Surrey*
3.3.8 To differentiate between those operations for recovery of waste and those operations which are for disposal of waste appropriate policies and supporting text will be required. For example, the supporting text should make clear that there is support for those engineering operations which represent a genuine benefit such as for the restoration of old minerals working while discouraging those proposals which may not be necessary and could amount to disposal.

Justification:

3.3.9 The SWLP should promote the sustainable management of waste in line with the Waste Hierarchy. This includes promoting waste prevention, reuse, recycling and recovery. Landfill should be seen as an option of last resort, although realistically there are certain types of waste which cannot be managed in any other way. PO1 and PO2 are considered to be compliant with the policy framework.

3.3.10 The issue of recovery and/or disposal of waste to land has been raised via a number of recent planning permissions. The SWLP will support applications for recovery to land. In line with the waste hierarchy those applications which amount to disposal, which sits at the bottom of the hierarchy, will be considered less favourably. Hence PO3 is also consistent with the policy framework.

3.3.11 The implementation of the preferred options will support the aims and objectives of the draft Vision. Paragraph 17 of the NPPF highlights that the planning system should be genuinely plan-led therefore, the preferred options will be implemented through appropriate policies in the SWLP which will then form part of the policy framework for Surrey.

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

<table>
<thead>
<tr>
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<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>In preparing their Local Plans, waste planning authorities should … ensure that the need for waste management facilities is considered alongside other spatial planning concerns (NPPW, Paragraph 2).</td>
<td>See Option 1A.</td>
<td>Option 2A</td>
<td>Consultees supported the waste planning authority working with key stakeholders to support waste prevention, re-use, recycling and recovery targets. It was also noted that this option would accord with Section 3 of the NPPW.</td>
<td>Supported.</td>
</tr>
<tr>
<td>Waste planning authorities should assess the suitability of sites and/or areas for new</td>
<td></td>
<td>Work with our stakeholders to support initiatives that help meet local targets for prevention, re-use recycling and recovery. (N.B. This is the same as option 1A).</td>
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</table>
or enhanced waste management facilities against … the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community (NPPW, Paragraph 5).

Waste is a strategic issue which can be addressed effectively through close co-operation between waste planning authorities and other local planning authorities (nPPG for waste, Paragraph 015 Reference ID, 28-015-20141016).

The siting of waste management facilities will be driven by a number of issues including… the likely distribution of waste arisings, which for many wastes would be expected to be similar to the existing and anticipated structure and layout of settlements (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).

| Option 2B | There was support for the principle of waste being managed, where possible, close to where it arises. However, there is a need to take account of impacts on residential amenity. Concern was raised that this strategy could lead to the need to identify multiple sites, and could risk losing the cumulative benefits of allocating larger facilities, including economies of scale and facilitating other forms of development as part of a wider mixed-use development. Reservations were expressed about deliverability due to competition for land for housing and employment around existing communities and businesses.

There was support for the principle of waste being managed, where possible, close to where it arises. However, there is a need to take account of impacts on residential amenity. Concern was raised that this strategy could lead to the need to identify multiple sites, and could risk losing the cumulative benefits of allocating larger facilities, including economies of scale and facilitating other forms of development as part of a wider mixed-use development. Reservations were expressed about deliverability due to competition for land for housing and employment around existing communities and businesses.

There was support for the principle of waste being managed, where possible, close to where it arises. However, there is a need to take account of impacts on residential amenity. Concern was raised that this strategy could lead to the need to identify multiple sites, and could risk losing the cumulative benefits of allocating larger facilities, including economies of scale and facilitating other forms of development as part of a wider mixed-use development. Reservations were expressed about deliverability due to competition for land for housing and employment around existing communities and businesses.

| No comments on deliverability. | Somewhat supported. |

| Option 2B | Promote the management of waste in locations near to communities and businesses. |

| | Somewhat supported. |

| | |
Conclusion:

3.3.12 Support was expressed for working with partners to meet sustainable waste management targets. Option 2A is covered by PO1.

3.3.13 While there was support for locating waste management sites close to the point of waste production it was questioned whether this approach would be viable if it involved lots of small facilities which wouldn’t benefit from economies of scale. Reservations associated with option 2B are noted but it may be that these are due to a lack of definition concerning the size of communities and businesses close to which a facility would be located. The Council recognises that, while the management of waste close to the point of production is encouraged by national policy, it would not be viable to have a waste facility for every community.

3.3.14 The county council also recognise that it may be that growth can be well served by a waste facility that has good transport links although it is not located in the immediate vicinity, hence it is the quality of the connection, rather than the distance, between facilities and communities that is most important. The Preferred Option would be to develop a network of sites well connected to the sources of waste in order to reduce transportation.

- PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.

Implementation:

3.3.15 The county council will further investigate the extent to which competition for land and economies of scale impact the ability to identify waste management facilities in locations near communities and businesses, specifically through the site assessment scoping statement and potential site allocations. Site allocations and relevant policies will be included in the draft version of the SWLP.

3.3.16 The spatial strategy should reflect the identified need to connect waste management facilities to main sources of waste. Appropriate policies for the location of new or improved waste management facilities and around transportation of waste will also be required to support the strategy. Those policies could include:

- Site Allocations (see also Objective 3, Objective 4)
- **Sustainable Transport (see also Objective 3, Objective 7, Objective 8)**
- **Locational Criteria or Development Management Criteria (see also Objective 3, Objective 4)**

**Justification:**

3.3.17 The SWLP needs to be compliant with the EU Waste Framework Directive (2008/98/EC) and the relevant planning policies and guidance which require the WPA to have regard to the principles of self-sufficiency and proximity in its planning functions with respect to waste development. The need for development of waste management facilities and any potential adverse impacts on communities and the environment will need to be balanced to achieve sustainable development.

3.3.18 The proposed preferred options and actions to implement these are policy compliant and will support the county council in achieving the draft Vision. As with the approach for other preferred options these will be implemented through appropriate policies in the SWLP which will then form part of the policy framework for Surrey.

**Consultation Draft Objective 3: To ensure new waste management facilities are developed in suitable locations.**

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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations (NPPW, Paragraph 4). In preparing their plans, waste planning authorities should … identify the broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area (NPPW, Paragraph 4). There may be occasions when a waste planning authority will wish to identify particular areas as suitable for waste management to provide for more flexibility for the market (nPPG).</td>
<td>The current adopted SWP 2008 identifies specific sites for waste management. Allocating specific sites would support safeguarding policies and provide certainty to stakeholders including residents, district and borough councils and operators. Policies would need to allow for the possibility that windfall sites could come forward and provide locational criteria to help guide this development.</td>
<td>Option 3A Generally identify suitable specific sites to meet the predicted need for new waste management facilities.</td>
<td>Respondents indicated 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 residents and businesses. No comments on deliverability.</td>
<td>Supported.</td>
</tr>
</tbody>
</table>
In preparing their Local Plans, waste planning authorities should … ensure that the need for waste management facilities is considered alongside other spatial planning concerns (NPPW, Paragraph 2).

In preparing their Local Plans, waste planning authorities should … work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management (NPPW, Paragraph 3).

| Option 3B | Use of broad areas to identify sites was not considered to be sufficiently clear or robust. Questions about deliverability of this option. |
| Option 3C | Concern expressed around the implications of locating waste management sites on industrial estates, and the ability of waste infrastructure to compete for a fairly small amount of available employment land. Questions about deliverability of this option. |

<p>| Preferred areas’ would allow more flexibility by not restricting development to a specific site. By allocating broad areas it may be difficult to identify the capacity that these areas could provide. In addition, while supporting flexibility this could be more difficult to safeguard from alternative forms of development. | Somewhat supported. | This could be problematic where timetables for producing local plans are not aligned. It may be difficult to identify these mixed use sites. There could be a need for a masterplan for these sites or strong agreements to ensure that development of waste management facilities is delivered. These may not currently exist. This option may not be deliverable but would demonstrate the Duty to Cooperate and collaborative working between the county council and district and borough councils. | Somewhat supported. | Identify sites or preferred areas alongside, or within, sites identified for other forms of development in district or borough local plans, to ensure a joined-up approach. |</p>
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<th>Option</th>
<th>Description</th>
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</table>
| **Option 3D** | Enable waste to be managed at one of the nearest appropriate locations by locating facilities as close as possible to key population centres and identified opportunities for growth, such as new settlements or major urban extensions. 

Facilities should be located in areas accessible from key sources of waste (primarily homes and businesses) and new sources of waste (areas of growth/new development). This option is policy compliant. 

As outlined above facilities should not result in likely adverse impacts to the environment or community. More information may be required before progressing with this option. |

| Option 3E | Mitigate impacts to communities by identifying site allocations which promote sustainable methods of transport and minimise travel distances on road networks. 

The county council recognises that alternative means of transport are not always possible in Surrey. However, in order to support sustainable transport movements by road made by waste management facilities should be minimised. This option is policy compliant. |

| | There was support for the principle of waste being managed, where possible, close to where it arises. However, there is a need to take account of impacts on residential amenity. Questions about deliverability of this option. |

| | Somewhat supported. |

| | Supported. |

The siting of waste management facilities will be driven by a number of issues including... the likely distribution of waste arisings, which for many wastes would be expected to be similar to the existing and anticipated structure and layout of settlements (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016). 

Waste management facilities against … the capacity of existing and potential transport infrastructure to support the sustainable movement of waste (NPPW, Paragraph 5). Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (NPPF, Paragraph 34). The siting of waste management facilities will be driven by a number of issues including...suitability of local transport infrastructure and availability of sustainable transport methods (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016). 

Comments stating that it is vital sites in highly residential areas and away from main trunk roads are not included in site allocations. Strong support for the principle of identifying site allocations which promote sustainable methods of transport but note that this does not negate the need to ensure that the impact on local road networks of such developments is acceptable. No comments on deliverability. |
Conclusion:

3.3.19 There was general support for allocating specific sites suitable for waste management in the SWLP. It was felt these sites should be close to where waste was produced but away from residential areas. There was concern about the viability of developing waste management facilities on industrial estates and other brownfield land where it was considered that the development of such facilities might be unable to compete with the development of other types of land use.

3.3.20 In light of the comment received on the options associated with meeting this objective, the Preferred Option is considered to be a combination of options 3A, 3D and 3E. This is addressed through:

- **PO5**: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.

Implementation:

3.3.21 The county council should include proposals for specific site allocations and ‘areas of search’ in a draft SWLP which would provide greater certainty to district and borough councils as well as developers and communities.

3.3.22 Opportunities for sustainable transport will be fully investigated and included in the evidence base that supports the draft version of the SWLP. The identification of suitable locations will also be informed by an investigation into the extent to which competition for land will affect the viability of developing waste management facilities in certain locations.

3.3.23 The draft spatial strategy should support the need for facilities which minimise road movements and are well connected to sources of waste. Appropriate policies for the location of new or improved waste management facilities and around transportation of waste will also be required to support the strategy. Those policies could include:

- **Site Allocations (see also Objective 2, Objective 4)**
- **Other areas suitable for development of waste management facilities**
- **Sustainable Transport (see also Objective 2, Objective 7, Objective 8)**
• Locational Criteria or Development Management Criteria (see also Objective 2, Objective 4)
Justification:

3.3.24 The policy framework requires the WPA to provide sites and/or areas for new or improved waste management facilities. However, the allocation of specific sites provides greater certainty to stakeholders and was the preferred option identified through consultation. This approach will be implemented through a site allocation policy in the SWLP and informed by the outcome of a suitable land assessment.

3.3.25 The need for sites will be balanced against the environmental constraints and potential adverse impacts to communities through providing appropriate policies for development management and sustainable transport. Policies will form part of the policy framework in Surrey and support a plan-led approach.

Consultation Draft Objective 4: To make best use of land when managing waste.

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<tbody>
<tr>
<td>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 (NPPW, Paragraph 3). In preparing their Local Plans, waste planning authorities should … work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management (NPPW, Paragraph 3). Waste planning authorities must include in their Local Plans … Sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery</td>
<td>The principle of net self-sufficiency as outlined in the draft vision means that Surrey should aim to provide enough waste management facilities to manage the equivalent amount of waste arising within the county. This option is policy compliant.</td>
<td>Option 4A Provide enough waste management facilities to deal with the equivalent amount of waste generated in the county.</td>
<td>Responses supported the option as it seeks to make provision for net self-sufficiency in waste management in line with the Waste Framework Directive. However, notes that this option does not appear to address shortfalls which are considered to exist in specialist waste capacity / processing ability in the county.</td>
<td>Somewhat supported.</td>
</tr>
<tr>
<td>Government has made it clear that there is no expectation that each WPA should deal solely with its own waste, rather the WPA should provide the equivalent of the amount of waste generated in the plan area.</td>
<td>Option 4B Provide additional facilities needed to deal only with waste produced in Surrey.</td>
<td>Net self-sufficiency is not being achieved in this option, and if chosen respondents would want to ensure it was based on robust evidence demonstrating why Option 4A is not achievable.</td>
<td>Not supported.</td>
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Developing the Draft Vision and Objectives

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<th>Surrey County Council Preferred Options – Vision and Objectives</th>
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installations (nPPG for waste, Paragraph 014 Reference ID, 28-014-20141016).

There is no expectation that each local planning authority should deal solely with its own waste to meet the requirements of the self-sufficiency and proximity principles (nPPG for waste, Paragraph 007 Reference ID, 28-007-20141016).

The ability to source waste from a range of locations/organisations helps ensure existing capacity is used effectively and efficiently, and importantly helps maintain local flexibility to increase recycling without resulting in local overcapacity (nPPG for waste, Paragraph 007, Reference ID, 28-007-20141016).

In considering the broad locations for the pattern of waste management facilities care should be taken, particularly for the smaller scale waste streams, to avoid limiting market flexibility. (nPPG for waste, Paragraph 037 Reference ID: 28-037-20141016).

Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations (NPPW, Paragraph 4).

In preparing their plans, waste planning authorities should … give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural buildings and their curtilages. This option is policy compliant.

However, within Surrey there is strong competition for brownfield land for housing and employment evidenced by the WPA's experience with loss of

The NPPW gives priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages. This option is policy compliant.

Option 4C

Give priority to previously developed land (PDL) including sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages when looking for sites and area.

Support was expressed with concern that this might mean waste infrastructure competing for a fairly small amount of available employment land in some districts and boroughs. Districts and boroughs would was to ensure that this option would not conflict with proposed designations of areas

This option does not deal with movements of waste and may restrict the viability of waste development. This option is unlikely to be deliverable.

This option does not take account of any need to work with other bodies (e.g. London authorities) which may not be able to manage their own waste generation as part of the Duty to Cooperate.

Additionally, this could limit the viability of waste management facilities by limiting sites to only dealing with waste from Surrey.

Limiting markets would also fail to support the range of facilities that are needed to manage different types of waste and the efficiencies of scale that can and need to be achieved.

Somewhat supported.
and forestry buildings and their curtilages (NPPW, Paragraph 4).

Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land) (NPPF, Paragraph 111).

While priority should be given to the re-use of previously developed land, greenfield allocations need not be entirely ruled out if that is the most suitable, sustainable option (nPPG for waste, Paragraph 041 Reference ID: 28-041-20141016)

<p>| and forestry buildings and their curtilages (NPPW, Paragraph 4). | waste sites safeguarded under existing policies. | safeguarded for employment / B class uses. |
| Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land) (NPPF, Paragraph 111). | There is concern that development of waste management facilities would not be able to compete with other types of development e.g. housing. | | Policy in the NPPW and NPPF require that the WPA gives priority to previously developed land, however greenfield locations need not be ruled out. |
| While priority should be given to the re-use of previously developed land, greenfield allocations need not be entirely ruled out if that is the most suitable, sustainable option (nPPG for waste, Paragraph 041 Reference ID: 28-041-20141016) | Option 4D Allow development on greenfield sites. | This option should only be pursued as part of a sequential approach to sites, after all sites in the urban area and those on Previously Developed Land have been utilised or are found to be unsuitable. |
| Policy in the NPPW and NPPF require that the WPA gives priority to previously developed land, however greenfield locations need not be ruled out. | Given the potential difficulties with development of waste management facilities competing for previously developed land this may be a necessary option. | Responses also stated that this should be a last resort and should only be considered if all other options have been considered and ruled out for valid planning reasons. |
| Given the potential difficulties with development of waste management facilities competing for previously developed land this may be a necessary option. | However, meeting the need for development of waste management facilities from sites located within areas of previously developed land would need to be considered in the first instance. | Somewhat supported. |
| However, meeting the need for development of waste management facilities from sites located within areas of previously developed land would need to be considered in the first instance. | Waste planning authorities, including should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development (NPPW, Paragraph 6). |
| Waste planning authorities, including should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development (NPPW, Paragraph 6). | Inappropriate development is, by definition, harmful to the Green Belt and should not be safeguarded for employment / B class uses. |
| Inappropriate development is, by definition, harmful to the Green Belt and should not be safeguarded for employment / B class uses. | The NPPF states that inappropriate development in the Green Belt is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. |
| The NPPF states that inappropriate development in the Green Belt is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. | Sites in the Green Belt would be required to conform to national policy and as such a case would need to be Option 4E In recognition of the shortage of development opportunities identify sites or preferred areas which are within the Green Belt. |
| Sites in the Green Belt would be required to conform to national policy and as such a case would need to be | The use 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, in accordance with the NPPF. |
| The use 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, in accordance with the NPPF. | However, respondents noted that it was highly likely that Somewhat supported. |</p>
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<td>approved except in very special circumstances (NPPF, Paragraph 87). The siting of waste management facilities will be driven by a number of issues including physical and environmental constraints limiting the likely opportunities for accommodating suitable waste management facilities (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).</td>
<td>made for ‘Very Special Circumstances’. However, ‘Very Special Circumstances’ may apply, for example if it could be demonstrated that there was need for development of waste management facilities and where there is a lack of alternative sites outside the Green Belt.</td>
<td>greenfield and Green Belt sites will need to be developed for waste management.</td>
</tr>
<tr>
<td>In preparing their plans, waste planning authorities should … consider a broad range of locations including industrial sites, looking for opportunities to co-locate waste management facilities together and with complementary activities (NPPW, Paragraph 4).</td>
<td>There is a benefit to locating similar uses together to minimise impacts to amenity. This option is also consistent with national policy. This option would only be acceptable for some types of waste management facilities and in some locations. This option would need more information to support its implementation.</td>
<td>Option 4F Promote the co-location of waste facilities within areas of non-waste development where appropriate e.g. industrial estates. Support stated where this would reduce the possibility of impacting on residential amenity. Somewhat supported.</td>
</tr>
<tr>
<td>Many existing waste developments in Surrey are the result of historical patterns of development. The WPA recognises that in some instances this land could be used more efficiently and that operators are keen to modernise but that current policies and site allocations do not support this.</td>
<td>Option 4G Identify opportunities to improve and improve existing waste management facilities. Support stated as likely to require the least use of additional land, however stressed the need to consider local amenity and accessibility issues as potential site options are considered. Somewhat supported.</td>
<td></td>
</tr>
<tr>
<td>In preparing their Local Plans, waste planning authorities should … consider the extent to which the capacity of existing operational</td>
<td>There is a need to not only plan for new or improved facilities but to maintain existing facilities to meet the</td>
<td>Option 4H A blanket safeguarding of sites was not considered a suitable option as this does not take Not supported.</td>
</tr>
<tr>
<td>Facilities would satisfy any identified need (NPPW, Paragraph 3).</td>
<td>Need for waste management capacity in Surrey. To do this development of waste management facilities needs to be safeguarded from alternative forms of development. The SWP 2008 safeguards all existing sites in waste use including waste water and sewage treatment works. The risk with this policy is that it safeguards sites which the county council may not want to continue to safeguard.</td>
<td>Safeguard all existing waste management facilities. Account the suitability of the site for continued use as a waste management location, ideally, waste management facilities and sites should only be safeguarded where there is clear evidence that they are required for future development and growth in the county.</td>
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</table>
Conclusion:

3.3.26 The option (4A) of achieving net self-sufficiency was generally supported.

3.3.27 Generally it was felt that a sequential approach, (e.g. prioritising PDL over greenfield sites) to the identification of suitable sites would be appropriate. The use of PDL for development of facilities was supported though potential viability issues related to competition for land were noted. There was no positive support for development on the Green Belt, it was considered that this should be a last resort.

3.3.28 Co-location of waste facilities with other uses on industrial estates was supported. Increasing waste management capacity by expanding existing facilities was supported subject to impacts on residential areas being avoided/mitigated. Blanket safeguarding of all existing waste facilities was not supported whereas safeguarding of facilities compatible with the draft Vision and Strategic Objectives was.
3.3.29 Options 4c, 4d and 4e also fit under Objective 3 as they relate to how the county council will approach the identification of sites. The comments and preferred options can be applied more generally to a strategy and informing the preparation of the SWLP. The preferred options from the consultation can be summarised as:

- **PO6**: Previously developed land (PDL) will be prioritised for allocation and development (this includes sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages).
- **PO7**: The co-location of waste facilities, within areas of non-waste development e.g. industrial estate, will be promoted where appropriate.
- **PO8**: The need for additional waste management capacity will in part be met by improving and enhancing existing waste facilities.
- **PO9**: Sites should be safeguarded where they are consistent with the SWLP’s Vision and Objectives, including their capacity for utilising sustainable modes of transportation.

**Implementation:**

3.3.30 The draft spatial strategy should promote the use of PDL in the first instance. This should include sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages in accordance with Paragraph 4 of the NPPW. The spatial strategy should not only encourage new facilities but also seek to maintain and improve existing facilities.

3.3.31 Appropriate policies for the location of new or improved waste management facilities will be required in the new SWLP. In addition, the new SWLP should also include policies for maintaining existing facilities i.e. safeguarding. The policies which could be required include:

- Need for waste management facilities in Surrey
- Redevelopment of current waste sites
- Safeguarding of current waste sites
- Site Allocations (see also Objective 2, Objective 3)
3.3.32 Justification:
The policy framework requires the WPA to provide sites and/or areas for new or improved waste management facilities. These sites will be preferentially located on PDL and in industrial estates where the impact on communities would presumably be less. This is consistent with the policy framework.

3.3.33 Given the pressures on PDL in Surrey there may be a need to look at greenfield sites and sites within the Green Belt. A sequential approach will look to greenfield sites only where need cannot be met through PDL. Where it is inappropriate development of waste management facilities in the Green Belt will need to demonstrate ‘Very Special Circumstances’. This preferred option remains consistent with national policy and ensures that Surrey can meet its identified need for waste management facilities in accordance with the draft Vision.

3.3.34 The preferred options will be implemented through appropriate policies in the SWLP and informed by the outcome of a suitable land assessment. Policies will form part of the policy framework in Surrey and support a plan-led approach.

Consultation Draft Objective 5: To maximise the economic benefits of waste management.

<table>
<thead>
<tr>
<th>Consideration of relevant policy and strategies</th>
<th>Other initial considerations</th>
<th>Consultation option</th>
<th>Consultation response</th>
<th>Assessment</th>
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<tr>
<td>In preparing their plans, waste planning authorities should ... should consider the suitable siting of [a low carbon energy recovery facility] to enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers (NPPW, Paragraph 4).</td>
<td>Waste management facilities are not often recognised as employment uses. Under the Use Class Order waste is classed as sui generis. However, waste management facilities do provide opportunities for employment. This option seeks to recognise the benefits of waste management as an employment use.</td>
<td>Option 5A Support the development of sites which capture economic benefits from waste by creating new jobs created and/or contributing to local Gross Value Added (GVA).</td>
<td>Support but consider that economic concerns should not be the primary consideration when determining location of sites and these should be balanced with other sustainability considerations. No comments on deliverability.</td>
<td>Supported.</td>
</tr>
<tr>
<td>When determining planning applications for non-waste development, local planning authorities should ... the handling of waste arising from the</td>
<td>A significant quantity of C, D &amp; E waste is produced in Surrey 1,972,000 tonnes in 2016. The</td>
<td>Option 5B Encourage new development to reuse and</td>
<td>Strong support as encouraging the re-use and recycling of</td>
<td>Supported.</td>
</tr>
<tr>
<td>Preferred Options – Vision and Objectives</td>
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<tr>
<td><strong>Devising the Draft Vision and Objectives</strong></td>
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- **Construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal (NPPW, Paragraph 8).**

  In preparing Local Plans, local planning authorities should … take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously (NPPF, Paragraph 143).

  "Non-waste“ planning authorities] must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy. This might include … promoting sound management of waste from any proposed development, such as encouraging on-site management of waste where this is appropriate (nPPG for waste, Paragraph 010 Reference ID: 28-010-20141016).

  ARJD (2013) states that recycled aggregates that can be used to substitute for land won aggregates are primarily recycled materials derived from C, D & E waste. Significant quantities of this waste arise in the county.

- **Reuse and recycling of C, D & E waste in new development is in line with the waste hierarchy.**

  As landfill capacity declines throughout the plan period from the finished restoration of mineral workings alternative methods of managing this waste stream will need to be promoted.

  One way of doing this, while supporting targets for 0.9 million tonnes per annum of recycled aggregates by 2026 in the ARJD (2013) would be to encourage sustainable construction methods which could include managing waste on site.

  A further way that the SWLP could encourage the management of waste arising from construction activities is to encourage the use of secondary and recycled aggregates. Again this supports targets in the ARJD (2013).

- **Recycle the waste generated from construction and demolition activities.**

  Suggested as encouraging the use of recycled materials in construction.

  No comments on deliverability.

- **Construction waste in construction.**

  Strong support as encouraging the use of recycled materials in construction.

  No comments on deliverability.

- **Strongly supported.**
Conclusion:

3.3.35 There was support for waste developments which are shown to have economic benefits and involve use of recycled materials and the sustainable management of construction and demolition waste arising from the development. A clear mechanism is needed or criteria needed for how economic benefits of waste management will be shared with those communities which host facilities.

3.3.36 There was also concerns throughout the consultation that the economic aspects of sustainable development were overshadowing the environmental and social aspects. The approach in the SWLP needs to balance all three aspects of sustainable development.

3.3.37 In light of the comments received on the options associated with meeting Objective 5, Preferred Options have been derived from options 5A, 5B and 5C as follows:

- **PO10**: Sites which create new jobs and/or contribute to local Gross Value Added (GVA) will be supported
- **PO11**: Waste generated from construction and demolition activities associated with all new development will be reused and recycled.
- **PO12**: The use of materials made from recycled waste in new development will be supported.
- **PO13**: Waste development which demonstrates key aspects sustainable design or supports sustainable development by meeting the challenge of climate change, flooding and coastal change including through reducing greenhouse gas emissions, promoting energy from renewable or low carbon sources and providing flood mitigation.

3.3.38 It should be noted that Option 5A does not anticipate that the ability of a site to offer economic benefits would be used as a criteria in identifying suitable sites for allocation.
Implementation:

3.3.39 The economic benefits of waste management facilities, including opportunities for employment, will require collaborative working with districts and boroughs who are responsible for policies and allocating land for employment uses. Where appropriate, the county council will ensure that these policies are not overly restrictive and recognise the contribution waste management facilities can make to the economy.

3.3.40 Appropriate policies to encourage sustainable development or sustainable design which take into account the economic, social and environmental aspects of new or improved waste management facilities. These policies might include references to low carbon energy recovery in line with national policy.

3.3.41 There was strong support for encouraging new development to reuse and recycle the waste generated during construction. National policy promotes the reuse and recycling of this waste on site. There was also support for the use of recycled materials in construction. Both options would meet the requirements of the waste hierarchy (through prevention, reuse and recycling of waste). These options could also help to manage C, D & E waste arisings in Surrey and support the adopted target of 0.9 mtpa of recycled aggregates by 2026 in the ARJDPD.

3.3.42 Therefore, policies in the new SWLP which could be required include:

- **Sustainable Development/Sustainable Design** (including reference to low carbon energy recovery)
- **Sustainable Construction and Waste at Development Sites**

Justification:

3.3.43 The preferred options will support the need for sustainable design and encourage sustainable construction. The preferred options will not only support the adopted plans and guidance in Surrey but will also be consistent with the national policy framework. These preferred options will be implemented through appropriate policies in the SWLP which will become part of the local policy framework.
Consultation Draft Objective 6: To encourage innovation and new technologies which provide opportunities to minimise the impact of waste development on communities and businesses.

<table>
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<tr>
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<tbody>
<tr>
<td>Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against … the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community (NPPW, Paragraph 5). The siting of waste management facilities will be driven by a number of issues including…physical and environmental constraints limiting the likely opportunities for accommodating suitable waste management facilities (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016). Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced (NPPW, Paragraph 7). There exist a number of issues which are covered by other regulatory regimes and waste planning authorities should assume that these regimes will operate effectively (nPPG for waste Paragraph 050 Reference ID: 28-050-20141016).</td>
<td>This option links to the main aims of the draft vision which seeks to protect human health and the environment. The objective recognises that best practice and innovation can support environmental outcomes. This objective seeks to encourage waste management facilities to modernise with the aim of delivering environmental or amenity issues. One of the reasons for reviewing the SWP 2008 is that the technology for managing waste has improved and the SWP was unable to anticipate these changes. As a result policies are restrictive, particularly around the use of certain technology.</td>
<td>Option 6A Ensure new waste facilities are well designed, well-constructed and well operated to protect human health and the environment.</td>
<td>Strong support for this option though suggested that greater detail is required to define what is ‘well designed’ etc. Support for this option however it is considered that there should be further options which identify how new technologies can be encouraged, and if encouraged this needs to be set out with clear options. Suggestion to add “and the historic and natural environment” at the end of the option statement. Also consideration for an additional option could be: “6B: 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”.</td>
<td>Supported.</td>
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</tbody>
</table>
Conclusion:

3.3.44 Support for this option was noted. ‘Environment’ includes historic and natural environment. The preferred option for meeting Objective 6 is as follows:

- **PO14**: Waste facilities will be well designed, well-constructed and well operated to protect, and where possible enhance, human health and the environment.

Implementation:

3.3.45 General support for the option with a request for greater definition so it is clear how the option would be implemented, including encouragement of new technologies. Policies will need to include wording which clearly sets out how the preferred option will be implemented.

3.3.46 Therefore, policies in the new SWLP which could be required include:

- **Sustainable Development/Sustainable Design (including reference to low carbon energy recovery)**
- **Development Management**

Justification:

3.3.47 The policy framework recognises that siting of waste management facilities will be limited by physical and environmental constraints. In Surrey, environmental conservation and enhancement was highlighted as a key issue for communities through the Issues and Options Consultation. The inclusion of policies for development management in the SWLP which will address a wide range of environmental and amenity issues will implement the preferred option. This is compliant with national policy and will support the plan-led approach highlighted in paragraph 18 of the NPPF.

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

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<tr>
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<th>Assessment</th>
</tr>
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<tr>
<td>Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against ... the capacity of existing and potential</td>
<td>This option is considered in relation to objective(s) which relate to the locations of waste development. There is likely to be better</td>
<td>Option 7A Minimise the need for waste transport by locating new</td>
<td>Residential amenity, and other accessibility and sustainability matters, and site specific considerations, will need to be</td>
<td>Somewhat supported.</td>
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</table>
Transport infrastructure to support the sustainable movement of waste (NPPW, Paragraph 5).

Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (NPPF, Paragraph 34).

The siting of waste management facilities will be driven by a number of issues including suitability of local transport infrastructure and availability of sustainable transport methods (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).

The siting of waste management facilities will be driven by a number of issues including the likely distribution of waste arisings, which for many wastes would be expected to be similar to the existing and anticipated structure and layout of settlements (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).

In preparing their plans, waste planning authorities should consider the suitable siting of a low carbon energy recovery facility to enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers (NPPW, Paragraph 4).

To help increase the use and supply of low carbon energy local planning authorities should design their policies to maximise renewable

| **Option 7B** Minimise the need for waste transport by identifying and/or safeguarding sites for facilities which are needed to allow transport of waste by means other than road i.e. rail and water. | Support the principle. Sites should be identified rather than broad areas. The use of the railway network to transport waste will have a number of benefits over siting facilities close to population centres. Cannot fully assess how feasible this is without more detailed information. | Somewhat supported. |

| **Option 7C** Encourage the generation of energy whereby waste is used as a fuel. | Considered EfW likely only acceptable on a micro scale and in locations considered acceptable when taking into account local amenity, environmental, accessibility and other sustainability considerations. It follows that using waste biomass to gasify and generate | Somewhat supported. |
and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily (NPPF, Paragraph 97).

Local plans should not generally prescribe the waste management techniques or technologies that will be used to deal with specific waste streams in the area (nPPG for waste, Paragraph 019 Reference ID, 28-019-20141016).

economic benefits from waste and reuse of waste on site.

In Surrey there has been only a limited number of proposals come forward for energy recovery from waste. However, this could be because of restrictive policies in the current SWP 2008.

electrical power and heat (CHP) is a highly sensible proposition, particularly when developments can come forward in an innovative modern and sustainable manner.

Dependent on identification of locations considered acceptable when taking into account local amenity, environmental, accessibility and other sustainability considerations.

Conclusion:

3.3.48 Responses indicated that there was support in principle for options which reduce emissions through sustainable transport. However, the use and/or safeguarding of facilities for the transportation of waste by rail and water will be subject to viability considerations. It is recognised under 7C that the SWLP cannot control technology (and stifle innovation) and, the use of a certain type of technology will be based on the specific circumstances of any allocated or proposed site.

3.3.49 These options are covered by existing preferred options. Namely:

- **PO2**: The council will need to provide policies which support reuse, recycling and recovery. This includes a preference for recycling over recovery (which includes the use of waste as a fuel) whilst recognising that landfill still needs to be planned for but only as a last resort.

- **PO5**: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.

- **PO13**: Waste development which demonstrates key aspects sustainable design or supports sustainable development by meeting the challenge of climate change, flooding and coastal change including through reducing greenhouse gas emissions, promoting energy from renewable or low carbon sources and providing flood mitigation.
- **PO14**: Waste facilities will be well designed, well-constructed and well operated to protect, and where possible enhance, human health and the environment.
Implementation:

3.3.50 Policies will be included which will ensure that local amenity, environmental, accessibility and other sustainability considerations are taken into account in siting new facilities. Policies in the new SWLP which could be required include:

- **Sustainable Development/Sustainable Design (including reference to low carbon energy recovery) (see Objective 6)**
- **Development Management (see Objective 6)**

Justification:

3.3.51 The preferred options for this objective are covered by preferred option and relevant proposed policies under the objectives above.

Consultation Draft Objective 8: To make sure movement of waste by road is kept to minimum practicable levels.

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<tr>
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<tr>
<td>Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against ... the capacity of existing and potential transport infrastructure to support the sustainable movement of waste (NPPW, Paragraph 5). Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (NPPF, Paragraph 34). The siting of waste management facilities will be driven by a number of issues including...suitability of local transport infrastructure and availability of sustainable transport methods (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).</td>
<td>In Surrey there is only limited possibilities for alternative means of transport. 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.</td>
<td>No specific options proposed.</td>
<td>Objective could include managing waste close to its source of production where necessary. This objective may be the most difficult to achieve due to the nature of waste transportation and the type(s) of waste that can be processed at each site, particularly in relation to specialist facilities.</td>
<td>Somewhat supported.</td>
</tr>
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</table>
The Surrey Local Transport Plan (STP) supports development which is planned in a sustainable way or which will provide the mitigation to address impacts arising from movement related to these developments.

Conclusion:

3.3.52 Managing waste close to its point of production would contribute to meeting achieving this objective though this would also depend on nature of transportation and type of waste. Opportunities for sustainable transport should be fully investigated and included in the evidence base that supports the draft version of the SWLP. In order to be consistent with the STP the SWLP should address issues of transport (safety, capacity and sustainability) related to waste development.

3.3.53 The preferred option which supports this objective is considered to be:

- **PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.**

Implementation:

3.3.54 The draft spatial strategy should support the need for facilities which minimise road movements and are well connected to sources of waste. Appropriate policies for the location of new or improved waste management facilities and around transportation of waste will also be required to support the strategy. Those policies could include:

- **Sustainable Transport (see also Objective 2, Objective 3)**
Justification:

3.3.55 The SWLP will include a specific policy related to transport issues for development of waste management facilities mainly around road safety, sustainability and capacity at existing junctions. This will ensure that the SWLP is consistent with national planning policy and the local transport strategy. Transport will also be an important consideration in any suitable land assessment and the outcome of any assessment should inform site allocations.

3.4 Assessing consistency of Draft Strategic Objectives and Draft Vision

3.4.1 It is important that the Draft Vision and Strategic Objectives are consistent. The Draft Strategic Objectives provide more detail on how the Draft Vision will be achieved. The Draft Strategic Objectives as such relate to the key elements of the Draft Vision. These key elements are based on various national and local policies and strategies as outlined above. The key elements are:

- Net self-sufficiency: The WPA should aim to identify sufficient opportunities to meet the identified needs of their area in terms of managing an equivalent amount waste that is generated. The WPA should ensure that sites and areas for development of waste management facilities are identified in suitable locations.

- Sustainable Waste Management (Waste Hierarchy): Planning plays a pivotal role in delivering sustainable waste management through the provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy (NPPW, paragraph 1).

- Resident wellbeing: The county council is committed to ensuring residents and businesses have access to those services they need. The WPA should support this by planning for enough land to deliver infrastructure to support growth. The facilities need to be in suitable locations, and be of a suitable type and design, to limit significant adverse impacts to communities. In addition, the WPA should encourage consultation and engagement to ensure that resident’s views are heard and understood.

- Environmental conservation and enhancement: The planning system should contribute to and enhance the natural and local environment by conserving and enhancing valued landscapes, heritage assets, biodiversity and geodiversity. In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment (NPPF, paragraph 110).
• Sustainable Development: The purpose of the planning system is to contribute to the achievement of sustainable development (NPPF, paragraph 6). The SWLP will seek to do this through playing its role in sustainable development (NPPF, paragraph 7), including:
  
  o Economic role – contributing to Surrey’s competitive economy, by ensuring that sufficient land is available for waste management facilities to support growth and innovation, and by identifying and coordinating development requirements, including the provision of infrastructure with other planning authorities.
  
  o Social role – supporting healthy communities, by providing accessible local services that reflect the community’s needs.
  
  o Environmental role – contributing to conserving and enhancing Surrey’s natural, built and historic environment, helping to minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

3.4.2 To demonstrate that the Draft Strategic Objectives are coherent with the Draft Vision and the other strategic objectives a short assessment of consistency has been undertaken (Table 3).

<table>
<thead>
<tr>
<th>Objective</th>
<th>Net self-sufficiency</th>
<th>Waste Hierarchy</th>
<th>Resident wellbeing</th>
<th>Environment</th>
<th>Sustainable Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategic Objective 1: To make sure enough waste management capacity is provided to manage the equivalent amount of waste produced in Surrey.</td>
<td>This objective makes clear that the new SWLP intends to be net-self-sufficient by providing capacity to manage the equivalent amount of waste generated in the county.</td>
<td>This objective does not refer to the Waste Hierarchy yet the sustainable management of waste will be reflected in the type of waste development being encouraged.</td>
<td>This objective does not directly address resident wellbeing, however, waste development is essential infrastructure to support homes and businesses. By providing sufficient land to manage the equivalent amount of waste produced in Surrey, the county council aims to meet the needs of Surrey residents.</td>
<td>This objective does not directly address environmental conservation and enhancement. Providing enough waste management capacity to manage the equivalent amount of waste generated in Surrey recognises the value of Surrey’s environment and that there is limited</td>
<td>This objective contributes to sustainable development by ensuring that sufficient land is available for waste management facilities to support growth and innovation and development requirements identified by Districts and Borough councils as part of their infrastructure requirements.</td>
</tr>
<tr>
<td>Objective</td>
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<tr>
<td><strong>Strategic Objective 2:</strong> To encourage development which supports sustainable waste management in line with national targets for recycling, recovery and composting.</td>
<td></td>
<td></td>
<td></td>
<td>opportunities in Surrey to provide waste development.</td>
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</tr>
<tr>
<td>This objective does not refer to net self-sufficiency but supports the county council’s aim of providing sufficient capacity to manage the equivalent amount of waste by encouraging more sustainable methods of waste management and reducing the amount of waste to be planned for (prevention).</td>
<td>This objective sets out in more detail the county council’s commitment to in line with the waste hierarchy by encouraging reuse, recycling and recovery. This objective is complimented by Strategic Objective 3.</td>
<td>This objective does not directly address resident wellbeing, however, promotes sustainable waste management including through reduction of waste and management of waste higher up on the waste hierarchy which could result in fewer impacts to residents.</td>
<td>This objective does not directly address environmental conservation and enhancement, however the sustainable management of waste including through reduction of waste and management of waste higher up on the waste hierarchy could reduce emissions which would limit impacts to the environment.</td>
<td>This objective contributes to sustainable development by helping to minimise waste and pollution as part of the environmental role the planning system plays through encouraging sustainable waste management in line with the waste hierarchy.</td>
<td></td>
</tr>
<tr>
<td><strong>Strategic Objective 3:</strong> 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.</td>
<td>This objective does not refer to net self-sufficiency but supports the county council’s aim of providing sufficient capacity by recognising the need for landfill.</td>
<td>This objective sets out in more detail the county council’s commitment to in line with the waste hierarchy by seeing disposal of waste to land as the least preferable method of waste management.</td>
<td>This objective does not directly address resident wellbeing, however, promotes sustainable waste management including through reduction of waste and management of waste higher up on the waste hierarchy which could result in fewer impacts to residents.</td>
<td>This objective does not directly address environmental conservation and enhancement, however the sustainable management of waste including through reduction of waste and management of waste higher up on the waste hierarchy could reduce emissions which would limit impacts to the environment.</td>
<td>This objective contributes to sustainable development by helping to minimise waste and pollution as part of the environmental role the planning system plays through encouraging sustainable waste management in line with the waste hierarchy.</td>
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<tr>
<td><strong>Strategic Objective 4:</strong> To retain and make best use of existing sites for waste development through supporting redevelopment and improvement of facilities</td>
<td>This objective supports Strategic Objective 1 in seeking to support the SWLP in providing enough land to manage the equivalent amount of waste arising in the county.</td>
<td>This objective does not refer to the Waste Hierarchy yet the sustainable management of waste will be reflected in the type of waste development being encouraged.</td>
<td>This objective does not directly address resident wellbeing, but encourages improvements and improvements of existing waste development which could result in fewer impacts to residents.</td>
<td>This objective does not directly address environmental conservation and enhancement, but encourages improvements and enhancements of existing waste development which could result in fewer impacts to the environment.</td>
<td>This objective contributes to sustainable development by ensuring that sufficient land is available for waste management facilities to support growth through safeguarding of sites for development of waste management facilities.</td>
</tr>
<tr>
<td><strong>Strategic Objective 5:</strong> To direct new facilities to locations that have been identified as suitable for waste development.</td>
<td>This objective supports Strategic Objective 1 in seeking to support the SWLP in providing enough land to manage the equivalent amount of waste arising in the county.</td>
<td>This objective does not refer to the Waste Hierarchy yet the sustainable management of waste will be reflected in the type of waste development being encouraged.</td>
<td>By directing waste development to the best available locations the SWLP will seek to minimise significant adverse impacts on communities.</td>
<td>By directing waste development to the best available locations the SWLP will seek to minimise significant adverse impacts on the environment.</td>
<td>This objective contributes to sustainable development by ensuring that sufficient land is available for waste management facilities to support growth through identifying new sites for development.</td>
</tr>
<tr>
<td><strong>Strategic Objective 6:</strong> To encourage innovation and new technologies which provide opportunities to minimise the</td>
<td>This objective does not refer to net self-sufficiency but supports Strategic Objective 1 in seeking to encourage innovation which could result in</td>
<td>This objective supports Strategic Objective 2 by encouraging innovation and new technology to manage waste more</td>
<td>By supporting innovation to reduce impacts to communities e.g. through developing on smaller footprint or improved access the SWLP will seek</td>
<td>By supporting innovation to reduce impacts to the environment e.g. through use of more efficient, cleaner technologies the SWLP will seek</td>
<td>This objective contributes to sustainable development by helping to minimise waste and pollution as part of the environmental role the</td>
</tr>
<tr>
<td>Objective</td>
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<tr>
<td>negative impacts and enhance the positive impacts of waste development on communities and the environment</td>
<td>improved use of existing land to support the SWLP in providing enough land to manage the equivalent amount of waste arising in the county.</td>
<td>sustainably i.e. higher up the waste hierarchy.</td>
<td>to minimise significant adverse impacts on the environment.</td>
<td>minimise significant adverse impacts on the environment.</td>
<td>planning system plays through encouraging innovation and new technologies to significant adverse impacts on the environment and communities.</td>
</tr>
<tr>
<td>Strategic Objective 7: To keep waste movement by road to minimum practicable levels and support options for sustainable transport.</td>
<td>This objective does not refer to net self-sufficiency but supports Strategic Objective 1 by encouraging sustainable transport to enable the county to transport waste to be managed at one of the nearest available installations (proximity principle).</td>
<td>This objective does not refer to the Waste Hierarchy however, sustainable transport and a reduction in emissions related to transport of waste are linked to the sustainable management of waste.</td>
<td>By seeking to minimise road movements the objective recognises the impact that HGV movements can have on communities and acknowledges the role sustainable transport plays in contributing to wider health objectives.</td>
<td>This objective encourages sustainable solutions and reduced movements by road which also supports solutions which also encourages a reductions in greenhouse gas emissions and reduce congestion.</td>
<td>By seeking to minimise road movements and encourage options for sustainable transport the supports sustainable development and acknowledges the role sustainable transport plays in contributing to wider sustainability objectives.</td>
</tr>
<tr>
<td>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.</td>
<td>This objective does not refer to net self-sufficiency but supports Strategic Objective 1 by encouraging partnership working to address issues like a lack of capacity for waste development.</td>
<td>This objective does not refer to the Waste Hierarchy explicitly but partnership working will be important for implementing the waste hierarchy e.g. waste prevention may be met through projects and programmes run by Surrey Waste Partnership.</td>
<td>This objective will support resident wellbeing by encouraging consultation and engagement and working with other authorities such as District and Borough councils to ensure that waste development meets the needs of communities while avoiding significant</td>
<td>This objective will support environmental conservation and enhancement by encouraging partnership working with other organisations e.g. Local Nature Partnerships, Historic England and others to ensure that development is positively</td>
<td>As part of delivering sustainable development partnership working is essential to provide accessible local services that reflect community need. As an example, waste development needs to be considered alongside housing and employment site which means working with Districts and Boroughs who are the</td>
</tr>
</tbody>
</table>
Table 4 Summary of preferred options for meeting revised objectives and policies which would implement these.

<table>
<thead>
<tr>
<th>Aspect of Vision</th>
<th>Strategic Objectives</th>
<th>Implementation in SWLP</th>
<th>Preferred Option(s)</th>
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</table>
| 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. | **Policy 1 – Need for Non-landfill Waste Development** | PO1: The Council will work with its partners to support initiatives that help meet local targets for prevention and reuse, recycling and recovery and prioritise development of facilities which allow management of waste further up the waste hierarchy. PO2: The council will need to provide policies which support reuse, recycling and recovery. This includes a preference for recycling over recovery (which includes the use of waste as a fuel) whilst recognising that landfill still needs to be planned for but only as a last resort. PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key
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</table>
| Sustainable Waste Management     | Strategic Objective 2: To encourage development which supports sustainable waste management at least in line with national targets for recycling, recovery and composting. | Policy 2 – Recycling and Recovery Operations  
Policy 3 – Operations for Recycling of Construction, Demolition and Excavation Waste  
Policy 4 – Sustainable Construction and Waste at Development Sites  
Policy 5 – Recovery of Inert Waste to Land  
Prevention Community Recycling Centres | PO1: The Council will work with its partners to support initiatives that help meet local targets for prevention and reuse, recycling and recovery and prioritise development of facilities which allow management of waste further up the waste hierarchy.  
PO2: The council will need to provide policies which support reuse, recycling and recovery. This includes a preference for recycling over recovery (which includes the use of waste as a fuel) whilst recognising that landfill still needs to be planned for but only as a last resort.  
PO3: The replacement of primary materials with suitable inert waste in engineering applications, including the infilling of mineral workings, will be supported.  
PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey. |
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</table>
|                                 |                                                                                      | Policies | Supporting Text                                                                 | PO11: Waste generated from construction and demolition activities associated with all new development will be reused and recycled.  
PO12: The use of materials made from recycled waste in new development will be supported.                                                                 |
| Sustainable Waste Management    | 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. |          |                                                                                     | PO2: The council will need to provide policies which support reuse, recycling and recovery. This includes a preference for recycling over recovery (which includes the use of waste as a fuel) whilst recognising that landfill still needs to be planned for but only as a last resort.  
PO3: The replacement of primary materials with suitable inert waste in engineering applications, including the infilling of mineral workings, will be supported. |
| Hierarchy                       |                                                                                      |          |                                                                                     |                                                                                                                                                      |
| Sustainable Development         | 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. |          |                                                                                     | PO6: Previously developed land (PDL) will be prioritised for allocation and development (this includes sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages).  
PO7: The co-location of waste facilities, within areas of non-waste development e.g. industrial estate, will be promoted where appropriate.  
PO8: The need for additional waste management capacity will in part be met by improving and enhancing existing waste facilities.  
PO9: Sites should be safeguarded where they are consistent with the SWLP’s Vision and Objectives, including their capacity for utilising sustainable modes of transportation. |
<table>
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</table>
| Resident wellbeing       | Strategic Objective 5: To direct new facilities to locations that have been identified as suitable for waste development. | Policy 9 – Green Belt  
Policy 10 – Strategic Waste Site Allocations  
Policy 11 – Other areas suitable for development  
Policy 12 – Wastewater Treatment Works | PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.  
PO10: Sites which create new jobs and/or contribute to local Gross Value Added (GVA) will be supported. |
| Environmental conservation/enhancement | Strategic Objective 6: To encourage innovation and new technologies which provide opportunities to minimise the impact of waste development on communities and the environment. | Policy 13 – Sustainable Design  
Policy 14 – Development Management | PO13: Waste development which demonstrates key aspects sustainable design or supports sustainable development by meeting the challenge of climate change, flooding and coastal change including through reducing greenhouse gas emissions, promoting energy from renewable or low carbon sources and providing flood mitigation.  
PO14: Waste facilities will be well designed, well-constructed and well operated to protect, and where possible enhance, human health and the environment. |
| Sustainable Development  | Strategic Objective 7: To keep waste movement by road to minimum practicable levels and support options for sustainable transport. | Policy 15 – Transport | PO4: The inclusion of a specific policy to deal with wastewater treatment works would support development of new facilities or enhancement of existing facilities to meet an identified need.  
PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key |
<table>
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<td>Environmental conservation/enhancement</td>
<td></td>
<td></td>
<td>population centres and identified opportunities for growth, such as new settlements or major urban extensions, where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.</td>
</tr>
<tr>
<td>Sustainable Development</td>
<td>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.</td>
<td>Policy 16 – Community Engagement</td>
<td>Duty to Cooperate</td>
</tr>
</tbody>
</table>

Surrey County Council Preferred Options – Vision and Objectives
5 Sustainability Appraisal

5.1.1 All planning authorities are required to carry out a sustainability appraisal (SA) when preparing Local Plans. According to the national guidance, the role of the SA is “to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives.” SA should be applied as an iterative process informing the development of the Local Plan. The content and purpose of a SA is not defined by law.

5.1.2 Separate to the domestic requirement for SA, European Union Directive 2001/42/EC requires that certain public plans and programmes be subject to strategic environmental assessment (SEA) as part of their preparation. The SEA must be carried out in accordance with the requirements. The aim of which is to identify the likely significant environmental effects of the proposal and all reasonable alternatives to it. The SEA will be carried out alongside the preparation of the plan, and the conclusions and recommendations of the assessment, including in respect of the consideration of alternatives, will be fed into that process prior to the finalisation of the proposals set out in the plan. The content and purpose of a SEA is defined by law.

5.1.3 An integrated SEA and SA is being carried out alongside the preparation of the SWLP. A draft Environmental & Sustainability Report will be published alongside the Draft Plan for consultation. The findings and recommendations of the integrated SEA and SA will be taken into account, alongside consultation responses and other evidence, in developing a final version of the new SWLP.

6 Next Steps

6.1.1 The next stage in preparing the Surrey Waste Local Plan will be a formal consultation on a draft version of the SWLP. This consultation is due to commence on 1 November 2017. The draft version of the SWLP will include policies and proposals for development of waste management facilities in Surrey. There will be further stages of consultation following comments received from the draft plan prior to submission and adoption.

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5 National Planning Practice Guidance (nPPG) Paragraph: 001 Reference ID: 11-001-20140306
Set out in Regulation 12(3) and Schedule 2 of the Environmental Assessment of Plans & Programmes Regulations 2004 (SI 2004 No.1633), and Annex I of the SEA Directive