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Table 1 - Waste Management Facilities Option One “A single policy providing environmental, amenity, need, and locational guidance and criteria specific to the provision of each type of waste management facility.”

Unique ID Reference	Summary of Issue	Response
CR50	There is a divergence here between the online portal questions and the pdf version of the consultation. The pdf version makes it clear that this question relates to material recovery facilities only, while the online question is more general about all facilities and leads to some confusion. Highlights that the portal is missing questions relating to waste transfer stations, recovery, anaerobic digestors, composting. Would like an opportunity in the future to address these points. For ease, considers that it would be more appropriate to have a policy to deal with each facility type that recognizes the differing needs of each and to prevent a single policy with numerous sub sections becoming unwieldy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Considers that the approach would allow specific details relevant to the provision of different types of facilities to be captured. There is a concern with option 2 specifically as it only states that the policy COULD include a range of different sub-categories providing LIMITED guidance relevant to material recovery facilities which could well mean that key issues relating to the provision of such facilities are not addressed in policy. Further comment: the Minerals and Waste Local Plan should be clear in terms of its approach to assessing applications in the Green Belt for all types of waste development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12, WR40	Selected this option in respect of planning for material recovery facilities, composting facilities, anaerobic digestion facilities and waste transfer stations and material bulking facilities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 2 – Waste Management Facilities Option Two “A single policy providing general environmental, amenity, need, and locational guidance and criteria relevant to all types of waste management facilities. The policy could include a range of different sub-categories providing limited guidance relevant to each types of waste management facility.”

Unique ID Reference	Summary of Issue	Response
CR5	Considers that all facility types listed should be included in the sub-categories, and that all should have sub-policies. Chosen this option because considers that the management of waste needs to be addressed in total.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR5	Raises that since bringing in charges at the waste transfer stations and material recovery facilities there has been an increase in fly-tipping which has a detrimental effect. Considers that current policies are insufficient and short-sighted and holistic policies are needed to combat issues. Considers that council charges and tax on manufacturers could help to pay for better waste management.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
WR51	Regarding thermal treatment selected option 2 as states there is the likelihood that thermal treatment will be located on a waste management facility with a variety of other waste management operations, and this approach would ensure full coverage of this and not limit facilities to being utilised for thermal treatment. Also states that thermal treatment presents issues in regard to its public perception and its effectiveness at minimising emissions and dealing with waste. The Eco Park at Charlton Lane operates with a significant throughput and provides for coverage of Northwest Surrey, including taking in waste from Runnymede and Elmbridge. States that Spelthorne would oppose any extensions of this site and to any provision of further thermal treatment at any other waste management facilities in the Borough. Should a new facility be required, then considers this should be located elsewhere in the county to ensure a more effective geographical spread and have coverage for southern parts of the county.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR52	Regarding materials recovery facilities, supports recycling as much household waste as possible and considers that either option 2 or 3 could provide necessary guidance on general environmental, amenity, need and location to all waste management facilities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 3 – Waste Management Facilities Option Three “Either Option One or Option Two above, with a sub-policy which allocates specific land or identifies areas of search for general or specific types of waste management facilities.”

Unique ID Reference	Summary of Issue	Response
CR10	Considers that all facility types listed should have sub-policies. Selected this option because all types of waste management have different challenges, and none are meeting everything they should currently.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR36, 43	Considers that all facility types should have a sub-policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR64	<p>Considers that all types of facility should have a sub-policy; and all the treatment options are likely to be subject to radical reappraisal in the next decade, especially for their climate change impacts. Material Biological Treatment is likely to be replaced by Material Recovery and Biological Treatment prior to landfill, since this is emerging as the residual treatment option with the lowest overall greenhouse gas impact. Thermal treatment with energy recovery is at its peak in the UK with overcapacity looming, and a phase out must be allowed for as the electricity grid decarbonises, with residual waste moving to Material Recovery and Biological Treatment to landfill (subject to landfill tax reform). A fuller integration of commercial and industrial and household waste collection and treatment is needed and should be allowed for, to achieve economies of scale and to capture the large amounts of recyclables and compostable escaping into the residual waste stream. Indications from past Waste and Resources Action Programme and Department for Environment, Food and Rural Affairs surveys are that 75% or more of commercial and industrial "residual" waste is readily recyclable, and over 50% of household waste likewise. Thus, significant recycling, anaerobic and composting capacity needs to be retained while efforts are made to drive down total waste arisings at source. Material Recovery and Biological Treatment plants are modular and relatively inexpensive, lending themselves to the flexibility required.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
CR64	<p>Reuse and repair are at the top of the waste hierarchy but are absent from the discussion or consultation. There needs to be a strategy to safeguard sites which may be needed by the community and commerce for reuse and repair. Considers that every community of significant size should have access to sites where construction materials, furniture and white goods can be stored and purchased for reuse. At present these facilities are allocated no space.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR22	The three options it is the most likely to ensure that the need for the management of waste in Surrey can be met.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Regarding materials recycling facilities, support option 3 in conjunction with option 1. States that environmental and location constraints will be important.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Regarding composting selected option 3 in conjunction with option 1.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Regarding anaerobic digestion selected option 3 in conjunction with option 1. States that environmental constraints will be important to support a specific policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Regarding waste transfer stations selected option 3 in conjunction with option 1. Locational and access requirements require a separate policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Regarding thermal treatment, disagree with the amount of waste going into energy from waste plants and proposed increases. At a time of diminishing raw materials, it is important to reuse and recycle far more waste. Support option 3 in conjunction with option 1 but with reduced emphasis on thermal treatment.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR46	<p>Supports a Local Plan approach which will allocate specific sites or areas of search based on a robust assessment of need of different types of waste facilities. This would align with the sub-policy approach of option 3. In order to set clear expectations for applicants looking to bring forward waste management development, the general approach set out at option 2 would be supported as it would provide both overarching guidance and guidance relevant to specific waste management types through sub-policies. Considers that given the potential impacts of waste management development allocation/area of search and development management sub-policies would be welcomed for all types of waste management development where it is practicable to do so. This would reduce the likelihood of speculative applications coming forward in unsuitable locations and applications which are lacking in relevant supporting detail. Setting clear expectations in this respect would be of benefit to applicants/developers and local communities.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR51	<p>Regarding materials recycling facilities selected option 3 as considers not all locations would be suitable under a 'one size fits all' policy approach. The differing characteristics and suitability of sites should be fully considered and included in any sub-policy which could outline these in greater detail. Also states that there is uncertainty of the quantum of waste arisings over a longer time-period and where these may be generated. In terms of location, whilst industrial areas tend to provide the size of unit required, there are increasing challenges with this as a number of such areas have begun to increasingly become locations for housing. Under the permitted development right for conversions of office to residential, this conflict is becoming more commonplace. There will need to be serious consideration of this issue and something that Spelthorne raised during the previous Surrey Waste Local Plan examination in 2019. Highlights Windmill Road in Spelthorne has been identified as an Industrial Land Area of Search however, there are an increasing number of such conversions to residential taking place in this area.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR51	<p>Regarding anaerobic digestion selected option 3 as not all locations would be considered suitable under a 'one size fits all' policy approach. The differing characteristics and suitability of sites should be fully considered and included in any sub-policy which could outline these in greater detail. Also states that Spelthorne houses one of the three anaerobic digestion facilities in the county and therefore provides for a substantial proportion of capacity for anaerobic digestion. Such facilities are land hungry and require good road access for Heavy Goods Vehicles and be sufficiently far from human and ecological receptors. This makes suitable sites limited and it would appear that the operation of Charlton Lane Eco Park will meet forecast demand moving forward. A specific policy, or reference within one, to the constraints that exist which make such facilities challenging to achieve would be of value. There should also be consideration of a greater geographical spread of any new facilities that may be required going forward to ensure that such facilities are not concentrated in one part of the county.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR51	<p>Regarding waste transfer stations and materials bulking facilities selected option 3 as not all locations would be considered suitable under a 'one size fits all' policy approach. The differing characteristics and suitability of sites should be fully considered and included in any sub-policy which could outline these in greater detail. Also states that there seems to be uncertainty over the quantum of waste arisings going forward. Should there be the requirement for new facilities, there should be a consideration for a greater geographical spread across the county. The extension of existing sites in Spelthorne would be resisted should this be considered necessary given the potential impacts, particularly on human receptors.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR52	<p>Regarding wastewater considers that either option 2 or option 3, so that it combines option 2 with a sub-policy allocating specific land or identifies areas of search, would be the most appropriate approach.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 4 – Waste Management Facilities Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR13	Did not select an option. However, commented that through the material provided they have learnt a lot about waste management. Also commented that they are concerned about what happens after the sorting and batching of paper, cardboard, and plastics; and about materials ending up in other countries and not being dealt with properly there. Highlights that some recycling symbols on packaging are confusing. Considers that Surrey County Council needs better communication about waste and recycling to build trust and confidence.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR15	Did not select an option. Considers that there should be a sub-policy for composting facilities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Did not select an option. Considers that there should be a sub-policy for all types of facility. Chose this option because considers that this will allow specific needs for each waste stream to be taken into consideration.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR5	The overall emphasis on prevention of waste and reuse, recycling and recovery over its disposal is broadly welcome.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Do not agree with the current processes for thermal treatment of waste. There is insufficient definition for the policy for thermal treatment. The particles are damaging to health, increase carbon emissions and pollution and negatively impact the backdrop to rural settings. Any process needs to ensure that all carbon and pollution is captured.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR12	Regarding other policy approaches that should be considered with reference to planning for waste management facilities, consider waste miles within the proposal and look at encouraging local waste mixed management.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Regarding other policy approach that should be considered with reference to planning for thermal treatment, prioritise amenity against impact on rural settings/landscape/built environment, limitations on waste from out of county.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR15	Surrey County Council should ensure that policies in the emerging Plan relating to waste management/deposit facilities identify all relevant considerations for proposals, or reference is made to where considerations are identified in National policy. While considerations for different types of waste management facilities may differ, the important component for policy is noting what may need to be considered, whether this is in a single general policy or separate policies relating to specific types of waste management facilities. Relevant considerations will likely differ depending on the specific circumstances of a given proposal and so should be considered on a case-by-case basis.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR39	Note that the options for waste facility types (Questions 1-12) are broadly similar, and are supported, however it is difficult to comment on whether the policies should include allocations as this should be led by the identified need for further waste management facilities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Regarding thermal treatment do not support the use of incineration as evidence suggests that the emission of ultrafine particles into the local environment at scale is very damaging to human health. Additionally, incineration contributes to the emission of carbon into the atmosphere and therefore incineration directly conflicts with the move towards net carbon zero.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	<p>The consultation document is not clear as to the status and capacity of the anaerobic digestion facility at Charlton Lane. This is understood to now be operational. As with other facilities large scale plants have proportionally greater local impacts. An option for enabling and encouraging smaller scale community anaerobic digestion plants should be considered. The policy should support and encourage anaerobic digestion plants at sewage treatment plants to improve energy generation at these sites.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>Material recovery facilities, agree that it makes more sense to transport waste to such a facility in Surrey as long as the market for the product is not far away, meaning the product is still transported the same distance albeit once sorted rather than as mixed waste for recycling. This does not appear to be explored in the consultation document but should be i.e., where are the final destination for current waste that is processed in Surrey's material recovery facilities and how might investment in more local capacity reduce overall waste transport by road.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>The material recovery facilities capacity could be viewed as a) supporting the scale of waste generation and b) supporting the market for recyclates to be turned back into similar quality and type of product within the county. The consultation document focuses solely on the waste need for material recovery facilities. The market need and appetite should also be investigated, and the policies established to foster the local displacement of virgin with recycled materials. The potential for industrial land to be allocated for subsequent recycling of the recyclates separated in material recovery facilities back into product within Surrey, to serve local markets, should therefore be explored and reflected in the policy framework as well.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR47	Material recovery facilities, it would be good for this planning policy framework to help enable Surrey County Council to bring forth such facilities in Surrey that is owned by the County Council and provides an added incentive to increase the quantity and quality of household and commercial recycling in Surrey. It is not clear whether the planning framework is a barrier to this, or if there is another reason why this has not progressed over the past decade.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Material recovery facilities, appropriate scale of individual facilities could also be explored and something that the policy signals support for. There is a balance between economy of scale and transport distances (longer distances = higher carbon footprint). In light of the Surrey County Council climate strategy and commitments on recycling the right scale of facilities should be considered across the county. The potential for this to be co-located with other waste management facilities (e.g., bulk material handling) should be explored and supported in the policy framework. Note that the target of 0% to landfill in the Municipal Waste Strategy implies that none of the waste in Surrey is sent to a thermal energy-from-waste plant (as this produces fly ash that is landfilled and bottom ash that is often landfilled) and that material recovery facilities target a very low contamination rate. This could affect the type of facilities built and their specification if the Minerals and Waste Local Plan is to fully align to the Municipal Waste Strategy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Waste transfer stations and material bulking facilities, there could be benefit in co-locating these facilities and also industrial sites that provide a demand for recyclates once separated. This should be supported in the policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
	<p>Thermal treatment of waste, the consultation describes thermal treatment as a 'waste management option'. This is incorrect and misleading in many cases, including with respect to the gasification plant approved at Charlton Lane, which is classed as waste disposal. Only plants achieving the R1 energy efficiency status are classified as energy recovery, as opposed to a waste disposal technology. This contrasts with paragraph 47 of the consultation, which incorrectly states that energy from waste should be classified as 'other recovery' on the waste hierarchy: in most cases it is disposal</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR47	<p>Thermal treatment capacity should be sought on a county-by-county basis is not supported as there is surplus capacity already available across the wider geography surrounding Surrey. A recent report on residual waste capacity in the Southeast, London and Eastern region by Sacks Consulting (2021). This report suggests a capacity of 3,599 kilo tonnes per annum for residual waste treatment in the Southeast compared to residual waste arising of 3843 kilo tonnes per annum assuming a minimum of 65% recycling rate (as required by policy). The report also notes a remaining landfill capacity of 38 million cubic metres in the Southeast at the end of 2019. Together this suggests that there is no further need for thermal energy from waste capacity in the Southeast, including in Surrey. What is needed instead is a plan for maximum flexibility as expect major change to achieve circular economy in line with UK and Surrey net zero targets over the forthcoming decades. Instead of direct incineration, gasification, pyrolysis or production of Refuse Derived Fuel that is subsequently burnt there is a need for waste policy to align to climate policy and limit the carbon emissions associated with waste disposal. One option would be to produce bio-destabilised material which can be safely landfilled with minimal methane product and separation as required by Government) to separate the inert from non-inert which will minimise total landfill requirement. Landfill of bio-stabilised material is a lower carbon option than thermal energy from waste treatment and allows for greater flexibility.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>Material recovery and biological treatment might be a viable alternative that increases the role of landfill as a biogenic carbon sink and also associated odour issues. It understood to typically have smaller, modular plants than the scale of capital investment required for thermal treatment that can be dismantled and moved if needed.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR47	No new energy from waste capacity is supported in Surrey. This requires a widening from the three strategic options set out.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR53	Surrey County Council should ensure that for any identified location, there will be no detrimental impact to the environment in terms of impact on flood risk, natural habitat, air quality and ground and surface water resources. States that due to the high polluting and in some instances contaminating nature of these waste development proposals, there are requirements of other regulatory mechanisms (i.e., permitting requirements) that need to be met as well. States the Environment Agency will be happy to engage with Surrey County Council in regard to the development of these waste management proposals at the very early stages. Also states the principles as highlighted in the Circular Economy paper should be at the forefront of decisions made in regard to developing these facilities to manage waste. Efforts should be made to encourage the management of waste further up the Waste Hierarchy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 5 - Wastewater Treatment Option One “A policy like Policy 12 of the Surrey Waste Local Plan 2019 and make no strategic provision for wastewater treatment facilities.”

Unique ID Reference	Summary of Issue	Response
CR50	Having a policy to deal with each facility type that recognises the differing needs of each and to prevent a single policy with numerous sub sections becoming unwieldy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR58	How recently the Surrey Waste Local Plan was examined by the Secretary of State and found sound. The Minerals and Waste Local Plan should be clear in terms of its approach to assessing applications in the Green Belt for all types of waste development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Selected this option in respect of planning for wastewater treatment facilities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR26	Would like a similar policy to Policy 12 of Surrey Waste Local Plan which includes text similar to the following: “The development or expansion of waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Consider that the existing policy approach is flexible enough to allow for the expansion of facilities in line with the independent commercial business model and the companies’ own population predictions.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 6 - Wastewater Treatment Option Two “A single policy providing general environmental, amenity, need, and locational guidance and criteria relevant to all waste management facilities. The policy could include a range of different sub-categories providing limited guidance relevant to wastewater treatment facilities.”

Unique ID Reference	Summary of Issue	Response
No representations received	No representations received.	No representations received.

Table 7 - Wastewater Treatment Option Three “Either Option One or Option Two above, with a sub-policy which allocates specific land or identifies areas of search for general or specific waste management facilities including wastewater treatment facilities.”

Unique ID Reference	Summary of Issue	Response
CR5	Considers that improvements are required to wastewater treatment as the system cannot currently cope with high rainfall events. Highlights issues with overflows of untreated sewage causing pollution. Considers that this problem will be exacerbated by climate change and increased housing, and a long-term view is needed including improvement of facilities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR10	Selected this because considers that wastewater is a big issue and cannot be ignored.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that this option gives most consideration of the problem of wastewater and will hopefully alleviate any current pollution of the water system. Commented that wastewater needs to be treated properly and not allowed to contaminate land or waterways.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR36, CR43	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Selected this option as considers it appears appropriate in investigating potential areas for new facilities to meet the required need in the county, however, highlights that the detailed policy wording will need careful consideration.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR24	Regarding wastewater treatment disagree that there is currently no need for additional facilities. With climate change and periodic heavy storms in conjunction with the implications of development and extensions and more hard surfacing etc., there is more run off and more flooding. Concerned about the amount of effluent going into the rivers at peak periods and causing significant pollution and loss of wildlife, and considers the calculations need to be revisited. Support option 3 in conjunction with option 1.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR34	Considering option 3, and the allocation of land or area of search for new wastewater treatment facilities, new facilities may on occasion be required to service new settlements and would have particular locational requirements that enable them to be near to the settlement they serve, but with adequate separation to mitigate any amenity impacts on residents, whilst also being sited near to a waterbody suitable to receive the treated effluent. Therefore, whilst identifying specific allocations or areas of search would be desirable, this would require coordination with master planning for new settlements (in some cases) and or for the outputs of our Water Resource Management Plan and Drainage and Wastewater Management Plans to be built into the Local Plans and Waste Management Plans. This may be due to the cycles of the planning processes not being exactly in synchronisation. Linking these would improve transparency and ensure our plans are flagged through the planning system at an operational level.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	Supports a Local Plan approach which will allocate specific sites or areas of search based on a robust assessment of need of different types of wastewater treatment facilities. This would align with the sub-policy approach of option 3 above. States that Policy 12 of the Surrey Waste Local Plan 2019 is very high-level and lacks in detail, therefore a policy with specific guidance relevant to wastewater treatment facilities, such as that suggested at option 2, would be supported.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR53	<p>Regarding wastewater treatment supports option 3. Strongly disagrees with option 1. States strategic planning for wastewater treatment facilities is vital to ensure that development of this strategy is kept in line with required improvements at sewage treatment works. Infrastructure and network capacity should be considered alongside environmental capacity. Section 41 states that wastewater treatment facilities are expected to be able to deal with any increases in wastewater up to 2035. It is not clear if this just looking at infrastructure and network capacity, or are any permit tightening provisions being considered? As growth is brought forward, any permit exceedance would require a new permit to be issued to ensure there are no deteriorations of Waste Framework Directive class elements. There should be a policy within this strategy to identify where growth may cause permit exceedance or would require the water company to increase its treatment capacity. Strategic plans should be evidenced using a Water Cycle Study or Water Quality Assessment. The Local Planning Authorities within Surrey may have up to date evidence bases which can support this strategic planning. While it is true that provisions for wastewater treatment capacity are considered on a case-by-case basis, objections to planning applications will be raised by the Environment Agency if there are concerns about water quality, which can cause significant delays. Strategic planning will allow the water companies to include known developments in their supply and demand plans and include any required improvements in their business plans. Recommends a policy that considers local authority obligations under the Waste Framework Directive and commits to maintaining and improving the water body objectives, as set out in the Thames River Basin Management Plan. Where development may impact on European Designated Sites, a policy relating to the Common Standards Monitoring Guidance should also be included.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 8 – Wastewater Treatment Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR13	Did not select an option. However, commented that although the consultation appears certain that there is sufficient capacity in most wastewater treatment, an official report recently highlighted that river are regularly polluted with overflows from such facilities because of heavy rainfall. Considers that the consultation is too complacent on this issue.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Regarding other policy approaches that should be considered with reference to planning for wastewater treatment facilities, consider enforcement policy against water companies who fail to increase capacity, when they have assessed it as such, within a given time frame (reference Cranleigh Water Treatment Plant under capacity for 40 years with circa 40% growth in housing).	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
WR34	In addition to the existing facilities listed in this table, we would add that Southern Water also operates wastewater treatment works in Mole Valley District at Ockley, Forest Green and Coldharbour.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR34	<p>With reference to Key Issues on page 14, paragraph 41 sets out some of the reasons for future upgrades of wastewater treatment works. However there are additional drivers to develop wastewater management that we would like to see included here such as: improving efficiency of biosolids management; updating existing processes; evolving regulation requiring improvements and additions to treatment, including emerging concerns such as pharmaceuticals and micro plastics; reduction in acceptability of stormwater discharges and increase in recreational water body use (both in rivers and the sea) at all times of year; reduced acceptability of local ground disposal from septic tanks; intensifying impacts of global warming and water scarcity; and, developing drivers such as biodiversity net gain and carbon neutrality. Development is also sometimes required in the network, to serve emerging issues and relatively small scale developer needs, for pumping stations and storm attenuation tanks which can require specific planning permission.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>The number of reported incidents of illegal leakage of raw sewage into rivers across Surrey (19,800 hours of sewage flow in 2020) suggests that there should also be capacity and operational improvements to existing wastewater treatment facilities. The policy should include reference to this, as well as enabling anaerobic digestion to maximise capture of sewage-related methane (reduce smells, maximise renewable energy generation).</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 9 - Deposit of Waste to Land Option One “Continue with the Surrey Waste Local Plan 2019 approach of providing for separate and specific policies for the disposal of waste to land and the recovery of waste to land.”

Unique ID Reference	Summary of Issue	Response
CR58	<p>How recently the Surrey Waste Local Plan was examined by the Secretary of State and found sound.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR39	Support option 1 given the different considerations for non-hazardous waste landfill, and inert recovery operations. These operations sit in different places in the Waste Hierarchy, when inert disposal to land is considered “recovery”, and therefore separate policies ensure there is no conflation of the two operation types.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	Option 1 combined with a sub-policy which allocates specific land or identifies areas of search for specific waste management facilities including deposit of waste to land. Considers this would minimise deposit of waste to land development coming forward speculatively in unsuitable locations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR51	States these are important issues that could have significant consequences if not dealt with effectively and therefore should be subject to separate and specific policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 10 - Deposit of Waste to Land Option Two “A single policy providing environmental, amenity, need, and locational guidance and criteria specific to the provision of new deposit of waste to land capacity.”

Unique ID Reference	Summary of Issue	Response
CR50	Having a policy to deal with each facility type that recognizes the differing needs of each and to prevent a single policy with numerous sub sections becoming unwieldy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Areas of search or specific facilities should only be identified where the need over the Minerals and Waste Local Plan period cannot be met on existing sites. It is essential that there is a commitment to continuous reduction in the percentage of waste which is deposited to landfill.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 11 - Deposit of Waste to Land Option Three “A single policy providing general environmental, amenity, need, and locational guidance and criteria relevant to all waste management facilities. The policy could include a range of different sub-categories providing limited guidance relevant to deposit to land facilities.”

Unique ID Reference	Summary of Issue	Response
CR18	Considers that it is the one that has most regard for the environment. Questions why, if the target is for Surrey to have zero waste to landfill, further landfill is being proposed?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR36, WR12	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that it would provide certainty to landfill operators.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR50, WR52	States it appears to be more comprehensive with respect to the development of criteria around waste management facilities and flexibility with the inclusion of sub-categories.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 12 - Deposit of Waste to Land Option Four “Either Option Two or Three above, with a sub-policy which allocates specific land or identifies areas of search for general or specific waste management facilities including deposit of waste to land.”

Unique ID Reference	Summary of Issue	Response
CR5	Considers that a properly resourced and managed system for waste management that is fit for purpose for the next 50+ years is needed, and this can only be done with proper planning and policies in place.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR10	Considers that it is the most transparent.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR64	Considers that the introduction of Material Recovery and Biological Treatment, subject to landfill tax reform, will extend the need for landfill or land raising options, with flexibility required to allow for the categories of waste treated in this way. Proximity of the Material Recovery and Biological Treatment plant to the landfill site and space capacity for the material biostabilisation over a period of weeks prior to landfill will have to be allowed for. The plan needs to build in the flexibility to accommodate shifts in waste management which will be required to achieve net zero targets. Flexibility is required to accommodate use of Material Recovery and Biological Treatment and landfill for residual waste, rather than thermal treatment, with corresponding changes in landfill tax.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR22	It is the most likely to ensure that the requirement for the management of waste by deposit to land in Surrey can be met.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR23	Considers this would provide certainty and flexibility and avoid policy repetition. Support paragraph 64 which acknowledges the need to ensure that the restoration of mineral workings is not prejudiced by a lack of suitable restoration material because of other 'recovery to land' schemes. Would like to see sufficient policy support for appropriate facilities which will help to maximise the opportunity to attract and recover the right materials for the legitimate restoration of mineral sites, so that restoration can be delivered progressively, in a timely manner and to a high quality.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Selected option 4 in conjunction with option 1.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 13 – Deposit of Waste to Land Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR43	Whilst agreed that inert waste is a valuable resource in securing sustainable restoration of landfill and quarry sites, the value provided by such sites as a recovery or disposal route for inert waste streams should not be overlooked.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Regarding other policy approach that should be considered with reference to planning for deposit of waste to land, prioritise amenity against impact on rural settings and landscape and built environment, limitations on waste from out of county.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	<p>Paragraph 58 implies that waste disposal equates to landfill. The Waste Hierarchy includes many energy from waste plants as waste disposal too, so no better than landfill. Similarly, from a waste perspective on-site backfilling or minimal land raising of material on a construction site (either demolition waste or inert or inappropriately disposed of construction waste) provides no useful material use, so should be classed in this category too. It should therefore be made clear that this so-called 'last resort' of disposal is still used in many cases that are claimed to be either material or energy recovery. The beneficial purposes of material recovery described in paragraph 59 are often overstated – the availability and low cost of this material to some extent creates its own market for the material! This policy failure needs to be addressed through stronger waste policies across the UK (especially for commercial and industrial, construction and demolition waste which is less heavily regulated and monitored than for municipal waste) as well as being acknowledged and reflected in this emerging policy framework in Surrey.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>Filling of old mineral workings is described as 'recovery of waste to land'. Such waste disposal of inert waste that does not require permission to be regulated as a landfill site should still be controlled and enforced by Surrey County Council to ensure that a) material that is hazardous or not inert is not placed in such sites; and b) that material that could be usefully recycled is not placed in such sites.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>The capacity gap is expressed as a negative figure in the consultation document, suggesting there is currently surplus capacity. It is not clear if that is what is intended.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>Paragraph 67 notes that 6% of local authority collected waste was landfilled in 2019/20. The overall breakdown of waste to landfill in Surrey as well as the total amount of non-inert filling of mineral workings or otherwise 'material recovery to land' that occurs should be provided at the next stage of consultation. This would be useful to know to inform different estimates of future 'recovery to land' as well as landfill need going forward.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR47	<p>It is not understood why Surrey wish to stop exporting waste out of Surrey for thermal treatment when there is surplus thermal treatment out of county and to start exporting waste out of the county for landfill whilst Surrey has many continuing mineral workings where some might be suitable for waste treatment in the short-medium term (as Surrey shifts to a circular economy). It is also acknowledged that whilst the 0% landfill target for municipal waste in the Municipal Waste Strategy is only deliverable when the thermal treatment is out-of-county, as the residual waste from this process still needs to be landfilled – and that this does not include either commercial and industrial or construction and demolition waste which forms much of the waste that is currently landfilled in Surrey.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

WR47	<p>The experience of providing regulatory oversight to current Surrey landfill sites should be reflected in the emerging policies. This should include: Understanding of the interface between landfill sites and hydrology – noting particularly the risk illustrated in Redhill when landfill operations create an area of land elevated around the surrounding area, without discrete separation of groundwater and run-off from neighbouring water courses, and the operational and long-term risks that this imposes; The need to ensure that the permitting regimes of the Environment Agency and County Council remain aligned throughout the life of the site. It is important to ensure that operations remain aligned to consented plans, as opposed to being updated retrospectively periodically through the life of the site; Monitoring by the council includes a requirement to record and report daily and monthly vehicle movements. Sources of this waste and waste mix would be also useful to require in future such that the catchment area for landfill sites are better understood. Trends in composition of materials landfilled as opposed to ‘recovered to land’ to inform what sensible constraints might be considered when assessing the suitability of sites; Often vehicles using the landfill site in Redhill use laybys nearby to park up (with associated loss of resident amenity) and queue on the public highway near the site prior to opening. This should be addressed in future planning policies; The landfill gas collected in Redhill is burnt to generate electricity only (around 30% efficiency) but the waste heat is not captured (as permission to pass this under the Brighton mainline train line was refused by Network Rail) and this appears to be burnt on a continuous basis as opposed to used on-demand like many other gas-fired electricity generators to better match the need of electricity consumers. Options on how to ensure this gas might contribute to better energy storage and be used for effectively should be encouraged proactively through the planning process; On at least one occasion at the Redhill landfill site the level of receipt of waste exceeded the ability of the site operator to install gas capture wells leading to a failure to capture landfill gas, leading to less energy efficient operation and significant local odour events. Can this be avoided in future through a stronger regulatory regime, including by Surrey County Council in their planning</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
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Unique ID Reference	Summary of Issue	Response
	<p>function? Redhill, as a land-raising 'land-fill' operation has required significant use of plastic to the sides of each cell that is constructed in the landfill site as a means to contain landfill gas produced. This was understood to be because the production of gas by the waste was different that that envisaged when original planning consent was granted. At some times this has been highly visible (large areas currently use white plastic as there is apparently a market shortfall in black plastic of the appropriate specification due to Brexit). Going forward it would be good to condition the colour of plastic that is used and to have stronger planning policies/conditions in two regards: a) to stipulate landfill gas management that is best-in-class, including regarding the % of landfill gas that is generated that is actually captured and utilised and b) consideration of additional planning policies/conditions for (or to avoid even) permissions of non-inert land-raising operations – as this is really what the Redhill landfill site really is. It might be useful to assess performance in enforcement and managing ongoing issues at other sites in developing the new set of policies, particularly from Surrey's enforcement team.</p>	
WR47	<p>One option that is not discussed is biostabilisation of waste to landfill. This is a policy option that has been discussed more in recent years. Research by the Department for Environment, Food and Rural Affairs back in 2014 determined that biostabilisation of waste would therefore improve the performance of landfill relative to thermal treatment. A more recent piece of research exploring waste disposal options for Scotland calculated that this would be the lowest carbon solution (Zero Waste Scotland, 2021, Figure 16). This would have the effect of turning traditional landfill into 'recovery of material to land'. This option should also be considered by Surrey County Council as a preferred policy option for landfill going forward that can act as a more flexible alternative to thermal treatment.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR53	<p>Regarding deposit of waste to land states that whichever policy option is decided, the Minerals and Waste Local Plan needs to be robust enough to prevent deterioration of groundwater quality. Impacts to groundwater can be either impossible or very costly to remediate (generally over a long period). Pre-commencement baseline studies of groundwater and surface water quality in the vicinity of any site needs to be considered at the earliest stage. Potential climate change impacts to water quantity/quality should also be considered at the earliest stages of planning. Highlights that option 1 should distinguish between disposal of waste to land and recovery of waste to land as well as distinguish between waste deposit to land and other waste management developments. Risk assessments (i.e. information the Environment Agency requires for the disposal of waste proposals) should be clear about the specific settings, risks and mitigations. Refers to the guidance document The Environment Agency's approach to groundwater protection, February 2018 Version 1.2, which should be included in policy justifications on policies relating to depositing waste to any land if absolutely necessary. Position statement E1 – Landfill locations; Position statements F1 – Non-landfill waste activities.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 14 – Identifying Land for Waste Management Development Option One “An approach which allocates land for specific waste management uses the acceptability of which is to be determined at the planning application stage based on criteria-based policy and need.”

Unique ID Reference	Summary of Issue	Response
CR50	<p>Considers that the Plan has issues of a lack of local authority dry waste recycling capacity, recovery capacity and construction, demolition and excavation waste recycling and recovery to land capacity. Considers that these need to be addressed by policy and site allocation, and that the main hurdle is a lack of available and suitable urban sites. This means urban fringe or rural sites will need to be released and the potential conflict with Green Belt policy overcome, ideally by allocating sites and removing them from the Green Belt. Considers that only option 1 seems capable of delivering this.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
CR18	<p>For the question regarding identifying land, selected option 1 ‘an approach which allocates land for specific waste management uses the acceptability of which is to be determined at the planning application stage’. Selected this option because considers that local authorities should be best placed to understand the impact of building new facilities.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR46	<p>It would ensure that specific types of waste management development are allocated only in areas where a) there would be the least possible impact on the Green Belt, environment and communities and b) where there is a demonstrable need for such type of facility. Considers an allocation-based approach would give applicants and developers a clear steer in terms of where specific types of development would be considered acceptable and minimise speculative applications. If it is not possible to allocate sites for specific types of waste management development, then an ‘area of search’ approach is considered to be the next best option as it would still reduce speculative applications and ensure that communities are aware of areas where waste management development may come forward in the future.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 15 - Identifying Land for Waste Management Development Option Two “An approach which identifies areas of search, with specific waste management uses to be determined at the planning application stage based on criteria-based policy and need.”

Unique ID Reference	Summary of Issue	Response
CR10	Considers that the local community must be consulted before decisions are made.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that it would support a supply of sites to replace obsolete sites and to meet growing need. Considers that an appropriate supply of sites, open when communities need them, would both help to meet need and reduce fly tipping. Access to such sites should be considered in terms of journey times and be within a 10-15 minute journey time.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	The preceding text does not appear to identify a current need for this type of development which would require an allocation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 16 - Identifying Land for Waste Management Development Option Three “A combined approach which includes a combination of Option One and Option Two above.”

Unique ID Reference	Summary of Issue	Response
CR5, CR15, WR24, WR51	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR36	Considers that brownfield sites should be prioritised and appropriate access for Heavy Goods Vehicles should be considered at planning stage.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR43	Flexibility needs to be integrated into any policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR64	Considers that it offers the best opportunity to (1) reserve space across the county for reuse and repair facilities, (2) reserve space suitable for landfill or land covering after Material Recovery and Biological Treatment and biostabilisation, including the space for these modular units to occupy land for possibly shorter periods of time than other residual waste treatments. Considers that no land needs to be allocated for thermal treatment since this is likely to be phased out.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR22	It is the most likely to ensure that the need for the management of waste in Surrey can be met.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR39	This provides certainty to the industry, whilst allow allowing other sites to come forward through criteria-based policies. This will ensure that the Plan is effective through its life, as facilities would still be able to come forward, if required, over and above any allocations, whilst also allow for technological advances in waste management. It is noted that some facility types are constrained as to their location, such as landfill or composting, whereby if there are identified needs, allocations rather than reliance on areas of search may be preferable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	It is important to ensure that areas of search or specific facilities are identified to ensure that any need is met over the Minerals and Waste Local Plan period.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR48	<p>It remains to be determined whether the implementation of option 1 in isolation would provide for sufficient potential development land to meet the identified need within the plan period. Within this context, option 1 should be implemented as far as reasonably practicable prior to consideration of option 2. The allocation of identified sites for specific waste-management uses provides the most robust approach of the four available options. In identifying specific sites for the development of waste management facilities, Surrey County Council is provided the opportunity to assess the suitability, viability, and achievability of sites in relation to the definitions provided in Planning Practice Guidance. In undertaking individual site assessments up-front at the plan-making stage, the Minerals and Waste Local Plan could provide a more robust set of site allocations that are more likely to be delivered within the plan period to meet the identified capacity gap. Should the implementation of option 1 not identify sufficient sites for waste-management development, the Minerals and Waste Local Plan should seek to implement option 2 as a second step to ensure that further waste-management development can be guided by the criteria-based policy. Essentially, this would comprise the implementation of option 3.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 17 - Identifying Land for Waste Management Development Option Four “Adopt a criteria-based policy approach only with no allocations or areas of search.”

Unique ID Reference	Summary of Issue	Response
WR37	<p>Option 4 appears to be the best solution for waste. Waste management is an evolving and changing industry/market and therefore the type of facility and location needs to be flexible. Surrey should recognise that the demand for sorting, recycling, and reusing primary aggregate materials as recycled aggregate is now going to escalate and more permanent facilities are going to be required as Surrey’s residents and businesses react to an increased awareness of the climate change, energy use and the impact of throwing away products and materials. This will include the disposal of building and construction materials and it is likely that there will be an invigorated focus on using recycled and secondary aggregates where possible to conserve the life of primary aggregates. Many of Surrey existing recycled aggregate sites are temporary and these will need to be retained under longer temporary permissions or as permanent facilities.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 18 - Identifying Land for Waste Management Development Further/Other Comments

Unique ID Reference	Summary of Issue	Response
WR12	<p>The most important issue or challenge facing waste management development in Surrey is changing waste management to meet multiple revolutionary adjustments to waste disposal in the face of natural resource depletion, demand for reduction in waste, improvements in recycling and demands of climate change. A shift in how waste is produced and managed.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR12	To address the issues or challenges facing waste management development in Surrey encourage less demolition and more re-purposing of development sites by making this Value Added Tax exempt like new builds; link to manufacturing to agree recyclable technologies; encourage local waste management investment; incentivise thoughtful waste disposal (sliding scales of building waste fees, prevent fly tipping); enhance recyclable waste collection sites (make it easy to recycle); and provide non-recyclable waste collection at cost.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	There needs to be flexibility in how waste sites are nominated, and the road network must be of an agreed standard to cope with the associated heavy vehicle traffic. Site should be on a pre-existing and suitable road or rail network.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR15	Crucially, consideration of the impact of waste development must be done on the basis of likely current and future impacts, for example the impacts on land which is allocated for non-waste development (in addition to existing non-waste development including existing residential areas). This is essential to avoid waste development inappropriately sterilising development for much needed housing and other infrastructure.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR15	The timely restoration of landfill sites, and particularly the parts of sites in close proximity to other current and potential uses, should be prioritised so that it does not unnecessarily constrain other development. This should apply to all planning applications relating to waste sites, including Section 73 applications to vary conditions or amend approved details.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR29	Any new waste facilities should be sited either on existing sites or brownfield sites. The Green Belt policy is as relevant today as it was in 1955, if not more so. It is essential to reconcile preservation of the Green Belt, its openness and permanence, with our ambitious plans for Nature Recovery and acknowledgment of the benefits of green open space for human health and wellbeing. The policy is not purely about resisting development (appropriate or otherwise) but about balancing all the harms against the environmental benefits that are delivered by maintaining the Green Belt in a populous area close to London.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR37	This plan needs to respond to future resource management by allocating sufficient primary aggregate sites but also ensuring there are sites for continuous secondary aggregate sorting and recycling, close to sources of supply and demand.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR38	Regarding strategic options with respect to identifying land for waste management development did not select an option, but states whatever approach is adopted it should seek to support the provision of permanent aggregate recycling facilities and allow for the possibility that these may need to be considered on former mineral workings.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	Regarding site allocations, advocates the need for allocations to be made for new waste management sites. States that Surrey County Council should not be prescriptive over the type of waste use on each site to promote flexibility. Would advocate a similar policy approach to the Surrey Waste Local Plan (Policy 11a) which identifies a list of strategic waste site allocations and requires proposals to meet specific criteria for each site. Considers that in order to provide clarity, priority needs to be afforded to the allocated sites. Considers that the Minerals and Waste Local Plan should 'overprovide' for land for waste in the way that the Surrey Waste Local Plan did (19ha of land for 6ha needed).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR53	Regarding identifying land for waste management development states they are happy to provide detailed comments on all constraints associated with sites allocated for waste management development and advice on the suitability of these sites. States they consider issues such as colocation and particularly impacts to the environment in terms of impact on flood risk, natural habitat, air quality and ground and surface water resources.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR54	Suggests that the section on Waste Management recognises that horse riders are included in the section on "safeguarding existing greenspaces and associated access" since these are vulnerable users who have the most to lose when waste sites, (and thus increased use of Heavy Goods Vehicles), are located adjacent to bridleways, or on routes in quiet country areas usually used by horse riders.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 19 – Calculating Need for Waste Management Development “Agree with the proposed targets”

Unique ID Reference	Summary of Issue	Response
CR15	Regarding calculating need for waste management development, selected 'yes, agree with the proposed targets for the Plan'.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	Selected this because considers that targets should reflect National policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Provide general support, although would like to have seen a greater increase for all the recycling targets.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR51	Supports targets for increased recycling and to reduce the amount of waste going to landfill. However, considers these increases must be done in a sustainable way and not at the expense of locating new facilities in inappropriate locations. States there appears to be limited information regarding forecasts and further detail to demonstrate the increases proposed would be of great value.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	The reductions of waste to land target for commercial and industrial waste and construction, demolition and excavation waste are only supported on a basis this means more recycling, as opposed to being used to justify increased thermal treatment capacity which is unsustainable in terms of circular economy, climate and longer-term need. The commercial and industrial waste and construction, demolition and excavation waste recycling targets lack ambition and are based on minimum legislative targets. Providing waste management capacity based on minimum legislative targets will maximise the amount of capacity required and act to constrain rather than stretch sector performance. Best practice in both of these sectors exceeds the 2040 target.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 20 – Calculating Need for Waste Management Development “Disagree with the proposed targets”

Unique ID Reference	Summary of Issue	Response
CR64	Selected this because considers that the plan needs a sensitivity analysis encompassing the option for Surrey County Council and its partner councils to address the large quantities of readily recyclable waste in commercial and industrial waste residual waste (75 to 90%) and household waste (50% +) according to Department for Environment, Food and Rural Affairs and Waste and Resources Action Programme research. Further comment: considers that the waste projections do not embrace the possible results of policy initiatives towards a circular economy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR40	Disappointed to see that there are no further reductions between 2035 and 2040 and would hope that a commitment to a circular economy would have a greater impact at this stage.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 21 - Calculating Need for Waste Management Development Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR10	Regarding calculating need for waste management development, selected 'Don't know'. Selected this because was unable to access the document, stated this might be a smartphone issue.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	For the question regarding calculating need for waste management development, selected 'Don't know' because agrees that Surrey should be dealing with its own waste and should extend facilities and perhaps build new ones but considers that the issue of waste reduction is not addressed. Considers that programmes such as 'Wastebuster' should be widely publicised, and that money should be spent on campaigns to educate people in the cost of dealing with waste both financial and environmental. Also considers that people should be encouraged to buy items that are not packaged, discouraged from buying new unless necessary and generally cutting waste. Considers that the same could apply to the construction industry, with contractors incentivised not to waste and penalised when they do. Further comment: highlights that there will be changes to laws around packaging next year, meaning that there should be more packaging suitable for recycling through material recovery facilities or composting, and therefore these facilities need to be prioritised above thermal treatment.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR43	Regarding calculating need for waste management development, selected 'Don't know' because the needs assessment is based on data that is 4 years old and should be updated.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	In respect of the need for waste management development and the proposed targets for the Minerals and Waste Local Plan, the targets are disappointing in that there is no further reduction between 2035 and 2040 where we would hope that a circular economy would have a greater impact at this stage.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	In respect of other issues or considerations relating to calculating need for waste management development, we suggest enforcement policy to be built into policies where targets are being missed. We also suggest that targets need to be set mindful of the loss of amenity applied.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	Highlights the need to review the 2019 Waste Needs Assessment.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	Considers that the Plan period should run until at least 2040 in case of any delays in the process of adoption.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	The local authority collected waste targets for recycling should exclude garden waste – i.e., the same target should be for all households, regardless of whether or not they have a garden.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	The basis for estimating commercial and industrial waste is not provided. Please can Surrey County Council require strengthened National legislation in this area so that we might actually have sufficient granularity of data and transparency of waste flows to understand this waste stream and better manage it.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	<p>Waste reduction targets should extend beyond food waste to include a) wider local authority collected waste components; and b) For commercial and industrial waste and construction, demolition and excavation waste need should also model waste reduction. The way in which achievement of higher recycling rates (excluding garden waste for clarity) leads to a reduction in overall waste volumes through a shift to a circular economy should be modelled. For example, the Department for Environment, Food and Rural Affairs highlight that over 50% of current household waste is readily recyclable or compostable. Similarly with regard to commercial and industrial waste recent research by the Department for Environment, Food and Rural Affairs and Waste and Resources Action Programme indicate that between 75% and 97.5% of residual waste is readily recyclable. Ensuring that these recyclables are recycled will lead to far lower residual rates. This could be achieved through the Minerals and Waste Local Plan working closely with the Surrey Waste Management Strategy, including through the Surrey Environment Partnership, to increase separation and maximise the quality and quantity of recycling and shift towards the circular economy across Surrey.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>This waste consultation includes position papers on climate change and the circular economy. It is not sufficient to claim to have a position on the circular economy, and then predict static or increasing waste volumes across the county. The shift to a circular economy must include interventions – National and at the Surrey level, within and also beyond this planning framework – that enable us to not continue to ‘predict and provide’ an increasingly unsustainable linear material use (take, make, break, throw-away) to a circular economy. Thus, the modelling scenarios of no growth, medium and high growth are considered inadequate. A low ambition and high ambition scenario for waste reduction in line with the stated circular economy and climate objectives should be modelled, with waste volumes for these also forecast and policy measures needed for their delivery developed.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR47	Currently local authority collected waste is modelled to with a lower scenario that reflects a decline in food waste. Is there any research that has been undertaken to determine the impact on whether reducing food waste or increasing recycling rates (in Surrey or elsewhere) has achieved wider waste reduction.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Does the modelling factor in changes since 2019 – notably the extent to which increases in home delivery have impacted on waste composition (assuming that most cardboard packaging is readily recycled) and may have increased overall tonnage of waste, but not residual waste? Thus, the scenarios with a higher tonnage could also potentially have a higher recycling rate such that this leads to an increase in recycling tonnage alongside a falling residual waste tonnage.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Scenarios and associated policies should be considered for reduction in waste volumes for construction activities, particularly if the focus shifts from new-build to retrofit in line with the climate and levelling-up agendas, the trend towards off-site construction and this is reflected in reduced overall waste flows. For example, it would be good for Surrey to improve waste recycling and management in this sector and provide a link here to monitoring and enforcement of building regulations, or similar tied to the assumptions made in this new policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 22 – Waste Arisings General Comments

Unique ID Reference	Summary of Issue	Response
CR18	It is incredible that hazardous waste has nearly doubled between 2014 and 2019 and asks why this is? Questions whether hazardous landfill is dangerous due to leaching of poisonous chemicals into land and watercourses? Asks what is being done regarding construction waste.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR43	Updated data is needed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	It is planned to provide approximately 100,000 additional houses over the Plan period, and considers that the future local authority collected waste figure does not appear to have factored this in.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	This section of the consultation document refers to three scenarios (no growth, medium growth, and high growth) that have been modelled in the Waste Needs Assessment to forecast arisings for local authority collected waste, commercial and industrial waste, and hazardous waste. This section of the consultation material then goes on to state that the high growth scenario is the preferred option for assessing needs in each case. The justification for this approach is not clear and as such, it is requested that the justification for relying on the high growth scenario is provided to allow additional scrutiny to the suitability of the approach to be given.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR64	Considers that projections need to be flexible enough to embrace policy initiatives, National and local, towards a circular (zero waste) economy, with the first step being to capture the large amounts of recyclable and compostable material escaping into the residual waste stream.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR5	In 2020/21 54% of household waste arisings were either recycled, reuse or composted. Of the 46% that were not recycled or reused, 42% were used as energy from waste and 4% was sent to landfill. Whilst the overall picture is encouraging because of the direction of travel from previous years, there is significant scope for improvement, and the Minerals and Waste Local Plan should provide the necessary policy measures to minimise waste arisings. Residual household waste collected per household increased by 19% between 2017/18 to 2020/21. Effort to reduce this should also be a priority in the Minerals and Waste Local Plan.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR22	Regarding baseline arising figures, forecast arising figures and scenarios, considers that the approach of planning for waste management on the basis of high growth scenarios is supported as this will most likely ensure that sufficient waste management capacity has been planned for.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Unsure why there is not an increase in household waste in view of the amount of development proposed over the next 20 years.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	States that although no commentary has been provided on what basis and inputs have been employed for the medium and high growth options, agrees that the high-rate option appears to be the most preferential, as to plan for a lower quantum of waste arising would risk the Plan not meeting the County's needs.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Surrey could also learn from examples overseas such as Contarina in Northern Italy where the amount of residual waste has been significantly reduced and their local waste strategy has a target of 10kg residual waste/household/year.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	No justification for the preference for the high growth in commercial and industrial waste is set out. Should not this be reduced through implementation of the UK circular economy package and the Waste and Resources Strategy? Scenarios and associated policies should be considered for reduction in waste volumes for commercial and industrial waste.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Scenarios and associated policies should be considered for reduction in waste volumes for hazardous waste.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	<p>It is noted that the land required for reuse and high-quality recycling might be in the form of smaller sites, but with a greater overall land/tonne-year requirement than for low-quality recycling and recovery. However, the wider impacts of these sites is likely to be lower and economic benefits (value added, job creation) greater. This could be reflected in the policies developed and the way in which different sites are allocated for different waste processes and different scales of operation. I am unclear how this would be best reflected in the four options set out.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>