

Surrey County Council Minerals and Waste
Planning Policy

Surrey Waste Local Plan

Preferred Options Report – Draft Policies

August 2017

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



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Executive Summary

- Surrey County Council is preparing a new local plan for waste which will set out a framework for development of waste management facilities in the county. The SWLP will allocate suitable sites for waste facilities and its policies will be used to determine planning applications concerning the management of waste including proposals for new waste facilities.
- The new Surrey Waste Local Plan (SWLP) will cover the period up until 2033 and will include policies and plans intended to ensure that waste is managed sustainably by ensuring sufficient land is available to deliver the facilities required to meet the identified need for waste management in Surrey. The SWLP considers how all types of waste should be managed and takes account of national and local policies for waste management.
- Between 2 September and 25 November 2016 Surrey County Council consulted on an Issues and Options Paper and a number of supporting documents. The Issues and Options Consultation set out the strategic context for waste management and it explored the overall scale of additional waste management facilities likely to be needed in Surrey during the plan period. It was the first formal opportunity for stakeholders to contribute to the new SWLP.
- The Council is now at a stage where the 'Preferred Options' for managing waste to 2033 have been identified and the Vision and Strategic Objectives have been refined in response to comments from stakeholders. This Preferred Options Report sets out how options have been assessed and how they have been taken into account in preparing the new SWLP.
- This document has been published to accompany the public consultation on a draft version of the Surrey Waste Local Plan between 1 November 2017 and 7 February 2018. The draft SWLP can be viewed and downloaded at the following website:
www.surreycc.gov.uk/newwasteplan.

1 Introduction

1.1 Purpose of the Waste Local Plan

- 1.1.1 Waste is generated by Surrey's homes and businesses and Surrey County Council needs to ensure that sufficient land is available for waste facilities to be built to manage it. It is also essential that those facilities do not result in unacceptable harm to the environment and human health. It is important that Surrey's waste is managed sustainably and this includes working towards sending zero waste to landfill.
- 1.1.2 As the Waste Planning Authority (WPA), Surrey County Council is required to produce a Waste Local Plan to show how and where Surrey's waste will be managed. The SWLP sets out the planning framework for the development of waste management facilities and is used in determining planning applications for such facilities. Essentially, the SWLP is intended to ensure that waste management facilities are developed of the right type, in the right place and at the right time.
- 1.1.3 It is essential that the Waste Local Plan is kept up to date to provide a robust and relevant policy framework to support the sustainable management of waste. The existing Plan (known as the Surrey Waste Plan) is now nearly ten years old. The replacement plan, known as the Surrey Waste Local Plan (SWLP), will cover the period from 2018 to 2033 and help ensure that sufficient waste management capacity will continue to be provided to ensure waste is managed in Surrey in the most sustainable way.

1.2 Preparing the new Surrey Waste Local Plan

- 1.2.1 There are several stages in preparing the new SWLP¹, many of which offer opportunities for residents, businesses and other key stakeholders to comment. The current version of the SWLP is a draft plan, subject to public consultation between 1 November 2017 and 5 February 2018, and is the second stage of consultation².

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

² In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

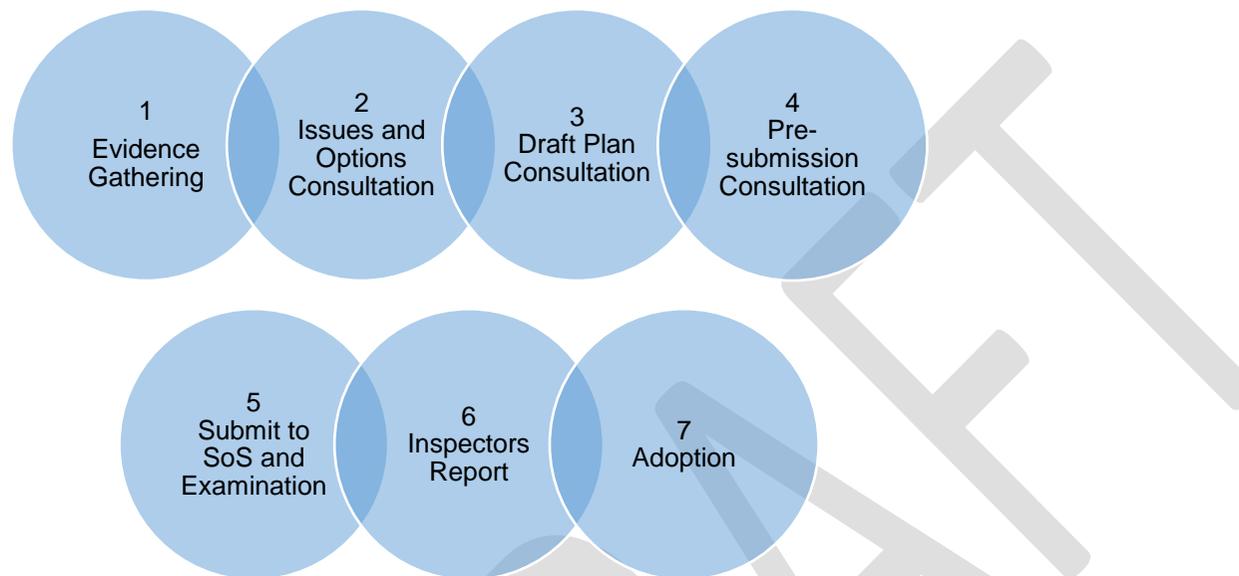


Figure 1 Stages of preparing the new Surrey Waste Local Plan Note: SoS = Secretary of State

1.3 Purpose of the Preferred Options Report

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

2 Background

2.1 Issues and Options Consultation

- 2.1.1 Between 2 September and 25 November 2016 Surrey County Council consulted on an 'Issues and Options Paper' as part of the preparation of the new SWLP. The consultation was designed to help establish what issues the SWLP needs to address and the options (or solutions) available for addressing these issues. Documentation associated with the first consultation on 'Issues and Options' can be viewed at the following website: www.surreycc.gov.uk/newwasteplan.
- 2.1.2 The next stage is to consult on a draft version of the new SWLP which will include specific policies and plans, and strategic site allocations designed to implement the Preferred Options set out in this report. The consultation is taking place between 1 November 2017 and 5 February 2018.

2.2 Summary of Key Policies and Frameworks

Waste Framework Directive

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

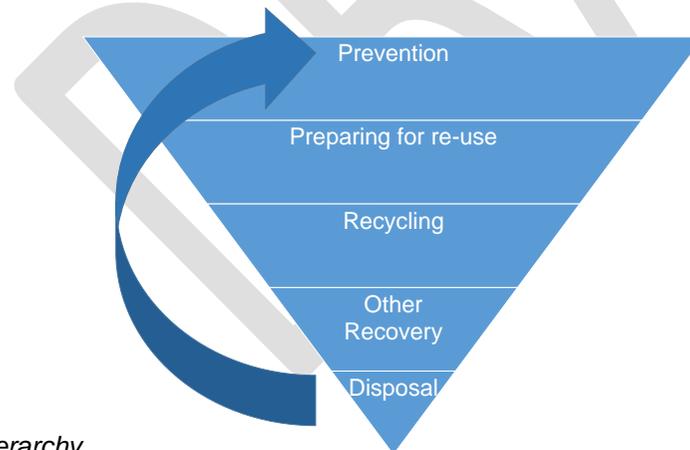


Figure 2 Waste Hierarchy

National Planning Policy Framework (NPPF) 2012

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

National Planning Policy for Waste (NPPW) 2014

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

Waste Management Plan for England 2013

- 2.2.5 The Government published a new national Waste Management Plan for England in December 2013. The plan brought together a number of policies under the umbrella of one national plan. It looks to encourage a more sustainable and efficient approach to resource management. It outlines the policies that are in place to help move towards the goal of a zero waste economy in the UK.

Surrey Waste Plan 2008

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

Minerals and Waste Development Scheme

- 2.2.7 Under the requirements for the Planning and Compulsory Purchase Act 2004, Surrey County Council is required to have a local development scheme. This is a public statement identifying which local development documents will be produced. The Surrey Minerals and Waste Development Scheme includes a programme for the preparation of a new SWLP. The scheme and SCI are available to view on the Council's website³.

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³ <https://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans>

Joint Municipal Waste Management Strategy

- 2.2.8 The Joint Municipal Waste Management Strategy (JMWMS) was adopted in 2015. The JMWMS focuses on the management of local authority collected waste, including; household waste from kerbside collections, household waste from community recycling centres, and other waste collected by the authority such as school waste and a small proportion of commercial and industrial waste.
- 2.2.9 Implementation of the JMWMS is the responsibility of the Surrey County Council Waste Disposal Authority as well as the District and Borough Council Waste Collection Authorities.

Local Transport Plan

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

3 Policy Development

3.1 Initial Considerations

- 3.1.1 Initial considerations when developing policies were formed based on current policy, any relevant national policies or guidance, local strategies or plans, best practice from other WPAs and the results of the Issues and Options consultation. These initial considerations provided a helpful steer for developing draft planning policies for the new SWLP.

Table 1 Initial considerations for developing draft planning policies for the new SWLP

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
Net self-sufficiency <ul style="list-style-type: none"> Policy CW4: Waste Management Capacity 	<ul style="list-style-type: none"> Need to emphasise net self-sufficiency. Need to recognise cross boundary and near boundary 	“In preparing Local Plans, waste planning authorities should identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over	Mayor’s Spatial Development Strategy (London Plan) – under review Adjoining WPAs with recently	PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new	<ul style="list-style-type: none"> Remove references to the regional plan. Emphasise net self-sufficiency. Recognise that nearest available

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
	<p>sites e.g. with London.</p> <ul style="list-style-type: none"> • Include figures in supporting text, not policy as circumstances can change. 	<p>the period of the plan” (NPPW, Paragraph 3).</p> <p>“The Local Plan relating to waste should identify sufficient opportunities to meet the identified needs of an area for the management of waste, aiming to drive waste management up the Waste Hierarchy” (nPPG for waste, Paragraph 011 Reference ID, 28-011-20141016).</p> <p>“When identifying sites for waste management facilities, waste planning should seek to demonstrate that the stock of allocated land provides sufficient opportunities to meet waste needs” (nPPG for waste, Paragraph 038, Reference ID: 28-038-20141016).</p>	<p>adopted Waste Local Plans including:</p> <ul style="list-style-type: none"> • East Sussex (2013) • Hampshire (2013) • West Sussex (2014) • Kent (2016) 	<p>settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.</p>	<p>installation may not refer to geographical proximity but rather connectivity.</p> <ul style="list-style-type: none"> • Link to the AMR. • Include figures in supporting text.
<p>Sustainable Waste Management (Waste Hierarchy)</p> <ul style="list-style-type: none"> • Policy WD2: Recycling, Storage, Transfer, Material Recovery and Processing Facilities (Excluding 	<ul style="list-style-type: none"> • Difficult for planning policy to address waste prevention. • Suggested targets for recycling. • Separate policy or wording for CRCs. 	<p>Article 4 of the Waste Framework Directive (WFD) includes the requirement for waste planning authorities to consider the Waste Hierarchy when planning for the management of waste.</p> <p>The waste hierarchy has been transposed into UK law through</p>	<p>Surrey Joint Municipal Waste Management Strategy (JMWMS) (2015)</p>	<p>PO1: The Council will work with its partners to support initiatives that help meet local targets for prevention and re-use, recycling and recovery and prioritise development of facilities which allow management of waste further up the waste hierarchy.</p>	<ul style="list-style-type: none"> • Include waste prevention in preamble but not necessary to have a policy for this. • Make sure targets are clearly articulated.

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
<p>Thermal Treatment).</p> <ul style="list-style-type: none"> Policy WD3: Recycling, Storage, Transfer of Construction and Demolition Waste. Policy WD4: Open Windrow Composting. Policy WD5: Thermal Treatment Facilities. 	<ul style="list-style-type: none"> Difficulties for small scale facilities. Recognition of waste coming from London. Prioritise material to restore mineral workings. Setting out technology in preamble and recognising that there will be future changes. 	<p>the Waste (England and Wales) Regulations 2011.</p> <p>The national Waste Management Plan for England 2011 also states that the local planning authority must have regard to the waste hierarchy in preparing their local plans.</p> <p>Beneficial use i.e. recovery to land should be promoted above disposal.</p>		<p>PO2: The council will need to provide policies which support reuse, recycling and recovery. This includes a preference for recycling over recovery (which includes the use of waste as a fuel) whilst recognising that landfill still needs to be planned for but only as a last resort.</p>	<ul style="list-style-type: none"> Include information in pre-ambles that refers to types of technology. Consider specific challenges for small scale facilities.
<p>Sustainable Waste Management (Waste Hierarchy)</p> <ul style="list-style-type: none"> Policy WD7: Disposal by Landfilling, Landraising, Engineering or Other Operations. Policy WD8: Landfilling, Landraising and Engineering or Other Operations. 	<ul style="list-style-type: none"> Preamble should include simple explanation of disposal and recovery, recycling. 	<p>Article 4 of the Waste Framework Directive (WFD) includes the requirement for waste planning authorities to consider the Waste Hierarchy when planning for the management of waste.</p> <p>The WFD considers disposal activities such as landfill as valid method of waste management but one which should be an option of last resort.</p> <p>Beneficial use i.e. recovery to land should be promoted above disposal.</p>	<p>Surrey Minerals Plan Primary Aggregates Development Plan Document (DPD) (July 2011)</p> <p>Aggregates Recycling Joint DPD (February 2013)</p> <p>Surrey Minerals Plan Minerals Site Restoration Supplementary Planning</p>	<p>PO3: The replacement of primary materials with suitable inert waste in engineering applications, including the infilling of mineral workings, will be supported.</p>	<ul style="list-style-type: none"> Explanation of disposal, recycling and recovery and make these separate issues Redraft policy name ensuring that it is different to the current WD7 policy. Need to make 'minimum quantity of waste' clearer – make this more part of the policy.

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
			Document (SPD) (July 2011)		<ul style="list-style-type: none"> WD8 from SWP 2008 is compatible with restoration – needs to be considered in any new policy.
<p>Environmental conservation and enhancement</p> <ul style="list-style-type: none"> Policy DC2: Planning Designations. Policy DC3: General Considerations 	<ul style="list-style-type: none"> Current Policy: DC2 Planning Designations – list is restrictive and National and Local designations are mixed together which is confusing. Heritage assets and landscape are not always designated. The policies need to address that they are still important. Positive design policy required. 	<p>Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against ... physical and environmental constraints on development, including existing and proposed neighbouring land uses (NPPW, Paragraph 5).</p> <p>NPPF Section 11. Conserving and enhancing the natural environment.</p> <p>In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. (NPPF Paragraph 110, pg. 26)</p>	Surrey Minerals Plan Primary Aggregates DPD (July 2011)	<p>PO13: Waste development which demonstrates key aspects sustainable design or supports sustainable development by meeting the challenge of climate change, flooding and coastal change including through reducing greenhouse gas emissions, promoting energy from renewable or low carbon sources and providing flood mitigation.</p> <p>PO14: Waste facilities will be well designed, well-constructed and well operated to protect, and where possible enhance, human health and the environment.</p>	<ul style="list-style-type: none"> Re-draft policy DC2 and remove the long list and perhaps include a new and improved list in appendix of the plan. Emphasise the importance of heritage and landscape even if these features are not designated. Include a positive design policy.

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
		<p>The siting of waste management facilities will be driven by a number of issues including...physical and environmental constraints limiting the likely opportunities for accommodating suitable waste management facilities. (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).</p>			
<p>Resident wellbeing</p> <ul style="list-style-type: none"> • Site Allocations • Policy CW5: Location of Waste Facilities. • Policy CW6: Development in the Green Belt. • Policy DC2: Planning Designations. • Policy DC3: General Considerations. • Redvelopment/ Improvement 	<ul style="list-style-type: none"> • Need to consider MC14 and other related policies in the SMP 2011. • Could also consider various broader amenity impacts such as noise, air quality, dust, odour, emissions, and countryside access. • Consider other policy areas such as environmental and transport. • Generally policy CW6 is effective 	<p>“Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or improved waste management facilities in appropriate locations” (NPPW, Paragraph 4)</p> <p>“In preparing their plans, waste planning authorities should... identify the broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area” (NPPW, Paragraph 4)</p> <p>Locational Criteria are set out in Appendix B of the NPPW.</p> <p>“Waste planning authorities, including should first look for suitable sites and areas outside</p>	<p>Surrey Minerals Plan Primary Aggregates DPD (July 2011)</p>	<p>PO5: Identification a network of specific suitable sites, well connected to main sources of waste (including key population centres and identified opportunities for growth, such as new settlements or major urban extensions), where possible by sustainable modes of transport, which can provide sufficient capacity to meet the predicted need for facilities capable of managing an amount of waste equivalent to that arising in Surrey.</p> <p>PO6: Previously developed land (PDL) will be prioritised for allocation and development (this includes sites identified</p>	<ul style="list-style-type: none"> • Have a policy that considers wider amenity impacts. • Use supporting text to refer to design and health in as related to amenity issues. • Preamble could include encouragement for pre-app discussions. • Specific policy for Green Belt is considered useful. • Include a policy that encourages high site efficiency as well as managing waste

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
	<p>and is rarely challenged on applications.</p> <ul style="list-style-type: none"> Wording will need to change in order to be more positive as stated by NPPF. 	<p>the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development” (NPPW, Paragraph 6).</p> <p>“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in special circumstances” (NPPF, Paragraph 87).</p> <p>‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. (NPPF, Paragraph 88).</p> <p>“The siting of waste management facilities will be driven by a number of issues including...physical and environmental constraints limiting the likely opportunities for accommodating suitable waste management facilities” (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).</p>		<p>for employment uses, and redundant agricultural and forestry buildings and their curtilages).</p> <p>PO7: The co-location of waste facilities, within areas of non-waste development e.g. industrial estate, will be promoted where appropriate.</p> <p>PO8: The need for additional waste management capacity will in part be met by improving and enhancing existing waste facilities.</p> <p>PO9: Sites should be safeguarded where they are consistent with the SWLP’s Vision and Objectives, including their capacity for utilising sustainable modes of transportation.</p>	<p>higher up the hierarchy.</p>

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
		<p>“Waste planning authorities must include in their Local Plans... Sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations” (nPPG for waste, Paragraph 014 Reference ID, 28-014-20141016)</p>			
<p>Sustainable Development</p> <ul style="list-style-type: none"> • Sustainable Design – no current policy • Transport (currently within Policy DC3: General Considerations) 	<ul style="list-style-type: none"> • Important any sustainable design policy does not contradict other local policies e.g. in district or borough local plans. • Need to aim to keep number of movements to a minimum. • Encourage sustainable transport options. 	<p>“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development” (NPPF, Paragraph 14).</p> <p>“In preparing Local Plans, local planning authorities should ... take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously” (NPPF, Paragraph 143).</p> <p>“Waste planning authorities should assess the suitability of sites and/or areas for new or improved waste management facilities against... the capacity</p>	<p>District and Borough Local Plans</p> <p>Surrey Transport Plan (January 2017)</p>	<p>PO11: Waste generated from construction and demolition activities associated with all new development will be reused and recycled.</p> <p>PO12: The use of materials made from recycled waste in new development will be supported.</p>	<ul style="list-style-type: none"> • Best practice at other authorities supports including a policy on sustainable design. • Will require discussions with district and borough development management planners to ensure compliments existing local plan policies. • Ensure a policy reiterates the need for applicants to provide a robust assessment of

Current policy	Identification of Issues	EU Directive/ National Policy/ National Guidance	Other strategies and plans	Results of Preferred Options	Early Approach
		<p>of existing and potential transport infrastructure to support the sustainable movement of waste” (NPPW, Paragraph 5).</p> <p>“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised” (NPPF, Paragraph 34).</p> <p>“The siting of waste management facilities will be driven by a number of issues including... suitability of local transport infrastructure and availability of sustainable transport methods” (nPPG for waste Paragraph 037 Reference ID, 28-037-20141016).</p> <p>“[Non-waste planning authorities] must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy” (nPPG for waste, Paragraph 010 Reference ID, 28-010-20141016).</p>			potential sustainable transport options.

4 Draft Policies

4.1 Overview

- 4.1.1 Following initial considerations several workshops were held internally where specific examples of proposals for waste management development were or were not successful, the reasons for these and any areas where there may have been confusion or a lack of clear guidance. This helped the county council better understand where the SWP 2008 was performing and where policies needed to be refined.
- 4.1.2 Discussions were also held with specific organisations to clarify comments that had been made under the Issues and Options consultation to ensure that these views were understood and to identify if any action(s) the county council was considering would address negative comments.
- 4.1.3 Building on the policies map sketched out under the Preferred Options – Vision and Strategic Objectives Report August 2017 where preferred options for achieving the strategic objectives were outlined work was done to assess how each policy would be supported by appropriate evidence and how policies would help achieve each Strategic Objective.

4.2 Net self-sufficiency

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

- 4.2.1 Under national policy the WPA is required to identify sufficient opportunities to meet the identified needs of its area for the delivery of waste management infrastructure⁴. The principle of net self-sufficiency means that Surrey should provide enough waste management facilities to manage the equivalent amount of waste arising within the county.
- 4.2.2 The policy which will implement Strategic Objective 1 is:
- Policy 1 – Need for Non-landfill Waste Development

⁴ National Planning Policy for Waste Paragraph 3

4.2.3 Evidence which supports the policy:

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

4.2.4 How the policy contributes to sustainable development:

- Policy 1 supports the application of the waste hierarchy in identifying the amount and type of facilities required and encouraging waste to be managed in the most sustainable way starting with prevention, followed by reuse, recycling and recovery. Disposal is seen as an option of last resort.
- The policy contributes to sustainable development by ensuring that the need for waste management facilities to support growth and development needs identified by Districts and Borough councils⁵ as part of their infrastructure requirements are identified and addressed.

4.2.5 How policies will implement Strategic Objective 1:

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

4.2.6 Policy Development:

- The county council has a responsibility to identify sufficient opportunities, sites and areas, to meet the needs of their area for the management of waste (NPPW, Paragraph 3). In addition, in preparing Local Plans, waste planning authorities should drive waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities (NPPW, Paragraph 3). These requirements, set out in national policy, were used to inform a draft policy which would identify and address the need

⁵ Through the preparation of the Interim Surrey Local Strategic Statement (LSS) and individual District and Borough Infrastructure Delivery Plans

for waste management facilities in Surrey. Policy 1 sets out what those needs could be and the potential for those needs to change overtime, but that up to date information would be available via annual monitoring.

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4.3 Sustainable Waste Management (Waste Hierarchy)

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

- 4.3.1 It is important to note that national policy⁶ states that in preparing Local Plans, waste planning authorities should drive waste management up the waste hierarchy. This means encouraging prevention of waste, preparing for re-use, recycling and recovery of waste. This includes recovery of inert waste to land.
- 4.3.2 Targets for recycling, recovery and composting are set out at an EU level in the WFD (2008/98/EC), the European Commission Circular Economy Package. At the national level targets are referred to in the Waste Management Plan for England. Local targets include those in the JMWMS. The draft version of the SWLP has calculated the need for waste infrastructure using targets which are the same or more ambitious than those above.
- 4.3.3 The policies which will implement Strategic Objective 2 are:
- Policy 2 – Recycling and Recovery Operations
 - Policy 3 – Operations for Recycling of Construction, Demolition and Excavation Waste
 - Policy 4 – Sustainable Construction and Waste Management in New Development
 - Policy 5 – Recovery of Inert Waste to Land
- 4.3.4 Evidence which supports the policies:
- Waste Needs Assessment (September 2017)
 - Preferred Options Report for Draft Policies (September 2017)
 - The adopted Surrey Aggregate Recycling Joint Development Plan Document 2013

⁶ National Planning Policy for Waste Paragraph 3

4.3.5 How the policies contribute to sustainable development:

- These policies contribute to sustainable development by helping to minimise waste and pollution by encouraging sustainable waste management in line with the waste hierarchy.

4.3.6 How policies will implement Strategic Objective 2:

- These policies will encourage certain types of development in order to provide enough waste management facilities to meet relevant targets for sustainable waste management as identified in line with Policy 1 – Need for Non-landfill Waste Development.

4.3.7 Policy Development:

- In preparing Local Plans, waste planning authorities should drive waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities (NPPW, Paragraph 3). It was recognised from experience in dealing with planning applications for new waste management facilities that certain types of facilities may have different types or scales of impact for example C,D&E waste recycling is typically carried out in an open yard compared to an Materials Recovery Facility (MRF) which is typically enclosed. As a result there was considered a need for more than one policy related to new or improved waste management facilities. The content of each policy recognises the specific issues likely to arise from this type of development, but all applications are subject to the same policy requirements with respect to impacts on the environment.
- Movement of waste up the Waste Hierarchy is not just the responsibility of waste planning authorities. All local planning authorities, to the extent appropriate to their responsibilities, should look to drive waste management up the hierarchy⁷. In order to encourage the implementation of the waste hierarchy during the construction and operation of non-waste related development which is the remit of the district and borough councils the county council currently has published standing advice. However, Policy 4 – Sustainable Construction and Waste Management in New Development builds on this to promote sustainable construction and ensure developers provide adequate consideration of waste in new developments.
- Recovery of materials sits above disposal on the waste hierarchy. Currently there is a lack of clarity on Policies WD7 and WD8 and when these would apply. To simplify and bring these definitions into alignment with the waste hierarchy Policy 5 – Recovery of Inert Waste to Land sets out what types of landfill, engineering operations or other operations would be considered

⁷ National Planning Practice Guidance (nPPG) for waste, Paragraph: 008 Reference ID: 28-008-20141016

recovery and how these would be dealt with by the county council in planning terms. Generally, using inert waste for the restoration of old mineral workings would be considered recovery. The policy is consistent with the SMP 2011 and Minerals Restoration SPD 2011.

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

- 4.3.8 The waste hierarchy sees disposal as the least preferred option for waste management and an option of last resort. However, it remains a necessary option for certain types of waste that cannot be practically disposed of in any other way.
- 4.3.9 The policy that will implement Strategic Objective 3 is:
- Policy 6 – Disposal of Non-inert Waste to Land
- 4.3.10 Evidence which supports the policy:
- Waste Needs Assessment (September 2017)
 - Preferred Options Report for Draft Policies (September 2017)
- 4.3.11 How the policy contributes to sustainable development:
- This policy contributes to sustainable development by helping to minimise waste and pollution by encouraging sustainable waste management in line with the waste hierarchy.
- 4.3.12 How the policy will implement Strategic Objective 3:
- This policy will ensure that landfill is provided only for waste which cannot be practically reused, recycled or recovered and is not unnecessarily sent for disposal. This policy also recognises that extensions of time to landfill may be needed as inputs of material change. Finally, this policy also sets out requirements for site restoration and aftercare to ensure that benefits from the development can be realised.
- 4.3.13 Policy Development:
- Policy 6 – Disposal of Non-hazardous Waste to Land compliments Policy 5 – Recovery of Inert Waste to Land. Disposal is considered to be the least preferable method of waste management and the policy therefore seeks to discourage waste which could be treated in another way being sent for disposal e.g. via landfill. The policy does recognise that there may be waste which cannot be treated in any other way and that waste management infrastructure should be provided to deal with these wastes. While no new need for facilities for disposal of waste is being encouraged good management of existing facilities is needed. As a result of the increasingly selective nature of these materials and the declining availability of capacity the policy recognises that careful monitoring is essential and that potentially extensions of existing facilities may be required.

4.4 Safeguarding existing waste infrastructure

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

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

4.4.2 The policies which will implement Strategic Objective 4 are:

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

4.4.3 Evidence which supports the policy:

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

4.4.4 How the policies contribute to sustainable development:

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

4.4.5 How policies will implement Strategic Objective 4:

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

4.4.6 Policy Development:

- Traditionally in Surrey, new capacity has been delivered through allocated or existing sites in or for waste management use. Current safeguarding policy in SWP 2008 covers all waste related development. The county council implements this policy through the Safeguarding Protocol which has been agreed by Surrey Planning Officers Association (SPOA). During the issues

and Options consultation respondents indicated that a policy which safeguards those sites and area which remain consistent with the Vision and Strategic Objectives of the plan would be a more acceptable approach to safeguarding. The policy builds on existing arrangements and work undertaken for the Consultation Protocol.

- In addition to safeguarding sites for waste development, Policy 8 – Improvement or extension of existing facilities, recognises the potential for existing sites to improve operations or use new technology in order to deliver benefits to or to provide additional capacity with fewer impacts on the environment or communities. While any application which comes forward for an improved facility will need to be consistent with other policies in the plan, in principle the redevelopment or improvement of sites will be supported.

4.5 Location of new waste infrastructure

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

- 4.5.1 One of the reasons Surrey is an attractive place to live and work is its high quality environment which includes a number of significant designations. By making sure that development of waste management facilities is located in the best locations the WPA aims to minimise significant adverse impacts on the environment.
- 4.5.2 In identifying new sites for waste management facilities, the WPA will meet the national requirement⁸ to identify sites for new or improved waste management facilities in appropriate locations.
- 4.5.3 The policies which will implement Strategic Objective 5 are:
- Policy 9 – Green Belt
 - Policy 10 – Strategic Waste Site Allocations
 - Policy 11 – Other areas suitable for development of waste management facilities
 - Policy 12 – Wastewater Treatment Works

⁸ National Planning Policy for Waste Paragraph 4

4.5.4 Evidence which supports the policy:

- Site Identification & Evaluation Report (September 2017)
- Evidence provided by the Wastewater Industry.

4.5.5 How the policies contribute to sustainable development:

- These policies contribute to sustainable development by ensuring that sufficient land is available in appropriate locations for waste management facilities to support growth.

4.5.6 How policies will implement Strategic Objective 5:

- These policies will seek to ensure that enough land is available for waste management infrastructure to support planned growth in Surrey. These policies will encourage waste related development to take place in the best available locations.

4.5.7 Policy Development:

- In identifying principles to guide waste development to the best possible locations policies were based on the Locational Criteria outlines in Appendix B of the NPPW. The criteria set out broad description of the issues and impacts for waste related development. Current policies in the adopted SWP 2008 seek to encourage waste development on allocated sites and land identified for industrial and storage purposes. Building on these broad issues and current policies in the SWP 2008 in addition to sites allocated as suitable for waste development a locational policy was also provided, which is consistent with the spatial strategy and NPPW, to guide any waste development which comes forward on unallocated sites.
- The current SWP 2008 has a policy for development in the Green Belt. There are also local plan policies for Green Belt in district and borough local plans. A number of Surrey district and boroughs have recently undertaken or are planning to undertake assessments of their Green Belt boundaries. The county council to a certain extent, will rely on sites within the Green Belt for waste related development due to issues with competition for land from housing, need to avoid sensitive receptors and locations of existing facilities. A number of respondents expressed concerns over Green Belt approaches during Issues and Options. The draft policy for waste development in the Green Belt is based on the existing policy but with supporting text to assist in addressing those concerns raised during earlier consultations.
- Site Allocations were identified through detailed assessment as outlined in the Site Identification & Evaluation Report.

4.6 Environment and Amenity

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

- 4.6.1 It is essential that the SWLP addresses all aspects of sustainable development – including the protection and enhancement of the environment. It is envisaged that this will be achieved through the development of waste management facilities in appropriate locations and with an emphasis on good design which will protect and enhance the environment. Those developments which use cleaner technologies or limit vehicle emissions through sustainable transport or minimal movements by road will also be supported.
- 4.6.2 Planning Practice Guidance recognises that the siting of waste management facilities will be influenced by physical and environmental constraints⁹. In Surrey, environmental protection was highlighted as a key issue for communities through the Issues and Options Consultation.
- 4.6.3 The policies which will implement Strategic Objective 6 are:
- Policy 13 – Sustainable Design
 - Policy 14 – Development Management
- 4.6.4 Evidence which supports the policy:
- Surrey Planning Service Annual Monitoring Report.
- 4.6.5 How the policies contributes to sustainable development:
- These policies contribute to sustainable development by helping to minimise waste and pollution at all stages of development. Policies for development management which seek to ensure that there are no significant adverse impacts from new or improved development and that this can contribute to protecting and enhancing the natural, built and historic environment.
 - These policies will also support development which can adapt to climate change by reducing emissions or through encouraging or implementing low carbon technologies.

⁹ Planning Practice Guidance for waste Paragraph 037 Reference ID 28-037-20141016

4.6.6 How policies will implement Strategic Objective 6:

- These policies will seek to ensure that waste management facilities in Surrey are of a high quality and that they do not result in significant adverse impacts to communities and the environment.

4.6.7 Policy Development:

- When determining waste planning applications, waste planning authorities should ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located (NPPW, Paragraph 7). Policy 13 was developed to encourage waste management facilities to be well-designed. This policy was based on principles of sustainable design as set out in NPPF.
- Policy 14 – Development Management seeks to conserve and enhance the natural and built environments. The conservation and enhancement of the natural and built environments was a key issue identified in the Issues and Options consultation. The draft policy is based on the NPPW, NPPF and nPPG. The decision to have a single policy which would cover a number of key environmental and amenity factors was to better align with the SMP 2011.

4.7 Sustainable Transport

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

4.7.1 Strategic Objective 7 seeks to encourage sustainable transport where available but also recognises that this is not always practicable. In Surrey there are only limited possibilities for means of transport other than road. Therefore, in the local context, there is a need for sustainable transport policies to address impacts on roads for example by seeking to minimise road movements.

4.7.2 The policy that will implement Strategic Objective 7 is:

- Policy 15 – Transport and Connectivity

4.7.3 Evidence which supports the policy:

- Surrey Local Transport Plan (January 2017)
- Site Identification & Evaluation Report (September 2017)

4.7.4 How the policy contributes to sustainable development:

- By seeking to minimise road movements and encourage options for sustainable transport the policy supports sustainable development and acknowledges the role sustainable transport plays in contributing to wider sustainability objectives including environmental objectives.

4.7.5 How the policy will implement Strategic Objective 7:

- This policy will encourage sustainable transport and seek to minimise movements by road.

4.7.6 Policy Development:

- The NPPF recognises that transport policies have an important role to play in facilitating sustainable development and wider sustainability and health objectives. The draft policy for sustainable transport focuses on the need to encourage sustainable transport of waste material this includes using sustainable transport modes. The policy recognises that Surrey has limited opportunities for sustainable transport e.g. rail and water and hence depends on road for the movement of waste.

4.8 Engagement

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

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

- Policy 16 will require an appropriate level of community engagement to be undertaken for waste management proposals prior to submitting an application. This will help ensure that communities are engaged in the planning process.
- Under this policy it is also essential that early discussions with communities are undertaken, prior to a planning application being submitted to the county council to ensure that these communities are involved in decision making.

4.8.8 Policy Development:

- Policy 16 – Community Engagement reflects the requirements for applications submitted to the county council under the county council's local list for validation of planning applications.

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5 Sustainability Appraisal

- 5.1.1 All planning authorities are required to carry out a sustainability appraisal (SA) when preparing Local Plans¹⁰. According to the national guidance, the role of the SA is “to promote sustainable development by assessing the extent to which the emerging plan ... will help to achieve relevant environmental, economic and social objectives”¹¹. SA should be applied as an iterative process informing the development of the Local Plan. The content and purpose of a SA is not defined by law.
- 5.1.2 Separate to the domestic requirement for SA, European Union Directive 2001/42/EC requires that certain public plans and programmes be subject to strategic environmental assessment (SEA) as part of their preparation. The SEA must be carried out in accordance with the requirements¹². The aim of which is to identify the likely significant environmental effects of the proposal and all reasonable alternatives to it. The SEA will be carried out alongside the preparation of the plan, and the conclusions and recommendations of the assessment, including in respect of the consideration of alternatives, will be fed into that process prior to the finalisation of the proposals set out in the plan. The content and purpose of a SEA is defined by law.
- 5.1.3 An integrated SEA and SA is being carried out alongside the preparation of the SWLP. A draft Environmental & Sustainability Report will be published alongside the Draft Plan for consultation. The findings and recommendations of the integrated SEA and SA will be taken into account, alongside consultation responses and other evidence, in developing a final version of the new SWLP.

6 Next Steps

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

¹⁰ National Planning Practice Guidance (nPPG) Paragraph: 020 Reference ID: 28-020-20141016

¹¹ National Planning Practice Guidance (nPPG) Paragraph: 001 Reference ID: 11-001-20140306

¹² Set out in Regulation 12(3) and Schedule 2 of the Environmental Assessment of Plans & Programmes Regulations 2004 (SI 2004 No.1633), and Annex I of the SEA Directive

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