

Surrey County Council

Surrey Waste Local Plan

Delivering the Spatial Strategy

January 2019

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1 Introduction

1.1 Issue

1.1.1.1 In preparing the new Surrey Waste Local Plan (SWLP) the county council is seeking to ensure that the strategy and policies of the SWLP will allow land which will be required to provide the waste management infrastructure needed in Surrey over the period of the SWLP (2019 to 2033) to be developed. This document explains the SWLP approach to ensuring that sufficient land can be developed to allow the sustainable management of waste in Surrey over the plan period.

1.1.1.2 The SWLP allocates sites for waste management and identifies areas of search, and to ensure the Plan is sound, does this in a way that is consistent with national policy. A key matter affecting the planning of future development in Surrey is the extent of the metropolitan Green Belt which covers over 73% of the county.

1.2 Policy context

1.2.1 National Planning Policy Framework (NPPF) 2018

1.2.1.1 In 2012 the Government replaced the former national planning policy guidance notes (other than that which covered waste management (see below)) and statements and Government Circulars with a single document, the National Planning Policy Framework (NPPF). A revised NPPF was published in July 2018. The NPPF is intended to ensure that sustainable development can be delivered.

1.2.1.2 The revised NPPF provides updated guidance for the preparation of local plans and encourages local plans to be kept up-to-date. The NPPF states that LPAs should ‘positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change’¹.

1.2.1.3 The revised NPPF includes an expectation that LPAs identify ‘sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)’².

1.2.1.4 The revised NPPF provides further clarification regarding policy on Green Belt. Specifically it includes the following: “before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development”³.

1.2.2 National Planning Policy for Waste (NPPW) 2014

1.2.2.1 The National Planning Policy for Waste (NPPW) 2014 replaced Planning Policy Statement 10 (concerning sustainable waste management). The NPPW sets out the Government’s ambition to work towards a more sustainable approach for resource management and use.

¹ Paragraph 11 of the revised National Planning Policy Framework (2018)

² Paragraph 23 of the revised National Planning Policy Framework (2018)

³ Paragraph 137 of the revised National Planning Policy Framework (2018)

1.2.2.2 The NPPW⁴ recommends that WPAs ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options.

1.2.2.3 With regard to Green Belt the NPPW⁵ implies that development of waste management facilities should be treated in the same way as other forms of development within the Green Belt whereas the preceding policy (Planning Policy Statement 10) was more sympathetic.

1.2.3 Surrey Waste Plan (SWP) 2008

1.2.3.1 The SWP sets out the current planning framework for the development of waste management facilities in Surrey. The SWP was prepared in accordance with national planning policy on waste management at the time (Planning Policy Statement 10) and adopted in 2008. The particular policies which relate to the allocation or delivery of waste management infrastructure are:

- Policy WD2: Recycling, Storage, Transfer, Materials Recovery and Processing Facilities (Excluding Thermal Treatment).
- Policy WD3: Recycling, Storage, Transfer of Construction and Demolition Waste at Mineral Sites.
- Policy WD5: Thermal Treatment Facilities.

2 Preparing a new Surrey Waste Local Plan

2.1 Preparing the plan

2.1.1.1 As the waste planning authority (WPA) Surrey County Council is required to produce a local plan for waste development, known as the Surrey Waste Local Plan (SWLP), to show where waste will be managed in Surrey in the future. The Plan sets out the planning framework for the development of waste management facilities and is used in determining planning applications for waste management facilities.

2.1.1.2 The SWLP seeks to make sure that land is available to be developed so that there are enough waste management facilities to handle the equivalent amount of waste arising in Surrey. In doing so the SWLP provides policies which ensure these facilities are located in sustainable locations (consistent with national Policy) and do not result in significant adverse impacts on amenity and the environment.

⁴ Paragraph 2 of the National Planning Policy for Waste (2014)

⁵ Paragraph 6 of the National Planning Policy for Waste (2014)

2.2 Spatial Strategy

2.2.1.1 The Spatial Strategy in the SWLP guides the form and location of waste development. This strategy was developed from the Preferred Options⁶ identified following the consultation on Issues and Options. In summary it seeks to provide the necessary waste management capacity by:

- safeguarding existing capacity,
- appropriate extensions and enhancements to existing facilities and
- the development of new facilities in suitable locations.

2.2.1.2 Redevelopment of suitable sites in existing waste management use is encouraged where improvement and diversification would lead to an increase in appropriate management capacity consistent with the waste hierarchy.

2.2.1.3 Areas potentially suitable for waste management development include sites and areas identified for employment uses, industrial and storage purposes, redundant agricultural and forestry buildings and their curtilages.

2.2.1.4 Waste management development is prioritised on previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages and/or land not in the Green Belt.

2.3 Identified need

2.3.1.1 The amount of land required for development is calculated using data provided in the 'Waste Needs Assessment' (WNA)⁷. The WNA sets out:

- i) The amount of waste arising in Surrey that needs to be managed and how (e.g. by recycling).
- ii) The amount of existing waste management capacity (by broad type) that is already built or has planning permission and will be built in Surrey.
- iii) The difference between the amount of waste to be managed and the existing capacity of the facilities available to manage it, known as a 'capacity gap'.

2.3.1.2 The WNA does not identify the management need for specific types of waste (e.g. household waste, or commercial and industrial), it identifies need according to broad waste management type (e.g. recycling). The WNA recognises that within the capacity reported there may be additional need that is not able to be identified through the WNA, for example need for bulking and storage capacity within 'recycling'. The outcome of the WNA is as follows:

⁶ Separate documents relating to the Issues and Options and setting out how the Preferred Options were identified have been published alongside this Plan and are available on the following website: www.surreycc.gov.uk/newwasteplan.

⁷ Waste Needs Assessment, January 2019

Table 1 Waste management capacity gap in Surrey (tonnes per annum) for recycling and recovery facilities (excluding construction demolition and excavation waste recycling and recovery to land)

| Treatment Type | 2016 | 2020 | 2025 | 2030 | 2035 |
|-----------------------------|---------|---------|---------|----------|----------|
| Recycling ⁸ | 540,000 | 423,000 | 281,000 | 175,000 | 15,000 |
| Anaerobic Digestion | 45,000 | 53,000 | 67,000 | 87,000 | 100,000 |
| Other Recovery ⁹ | -10,000 | -39,000 | -92,000 | -156,000 | -148,000 |

The WNA does not identify the management need for specific types of waste (e.g. household waste, or commercial and industrial), it identifies need according to broad waste management type (e.g. recycling). The WNA recognises that within the capacity reported there may be additional need that is not able to be identified through the WNA, for example need for bulking and storage capacity within ‘recycling’. The outcome of the WNA is as follows:

⁸ Including composting and transfer facilities

⁹ Other Recovery is not specifically defined in the revised Waste Framework Directive, although ‘energy recovery’ is referenced as an example. It can be assumed by their exclusion in the definition of recycling, that processing of wastes into materials to be used as fuels or for backfilling can be considered ‘other recovery’.

2.3.1.4 Table 1 shows there is a predicted surplus of recycling and anaerobic digestion capacity, but a gap for ‘other recovery’ capacity (shown in red).

2.3.1.5 The amount of land is calculated based on the capacity gap and the area of land likely to be needed to allow development of facilities with sufficient capacity¹⁰. Likely required areas of land are set out in Table 2 below.

Table 2 Assumptions made during the calculations of future land requirements for Other Recovery

| Treatment Type | Information used | | | | | |
|----------------|---|-----------------|---------|--|---|---------------------------|
| Other Recovery | Source of data: Section 5 (Pyrolysis & Gasification), Section 6 (Small Scale Thermal Treatment), & Section 7 (Large Scale Thermal Treatment) in Part 2 of the ODPM report on planning for waste management facilities (2004). | | | | | |
| | Area: | 1 to 2 hectares | Amount: | 50,000 tonnes per annum (pyrolysis or gasification) | Overall assumption used to calculate land need: | 2 hectares per 50,000 tpa |
| | Area: | 1 to 2 hectares | Amount: | 50,000 tonnes per annum (small scale thermal treatment) | | |
| | Area: | 2 to 5 hectares | Amount: | 250,000 tonnes per annum (large scale thermal treatment) | | |

2.3.1.6 The land required to meet the capacity gap set out in The WNA does not identify the management need for specific types of waste (e.g. household waste, or commercial and industrial), it identifies need according to broad waste management type (e.g. recycling). The WNA recognises that within the capacity reported there may be additional need that is not able to be identified through the WNA, for example need for bulking and storage capacity within ‘recycling’. The outcome of the WNA is as follows:

¹⁰ Based on the Office of the Deputy Prime Minister Planning for Waste Management Facilities A Research Study (August 2004)

2.3.1.8 Table 1 is therefore as follows:

Table 3 Land required to enable the delivery of waste management facilities meet the identified need for Other Recovery (to the nearest ha)

| | 2016 | 2020 | 2025 | 2030 | 2035 |
|--|--------|--------|--------|---------|---------|
| Additional 'Other Recovery' requirement (tonnes per annum) | 10,000 | 39,000 | 92,000 | 156,000 | 148,000 |
| Land needed (ha) | 0.4 | 1.6 | 3.7 | 6.2 | 5.9 |

3 Approaches to meeting the identified need

3.1 Appropriate extensions and enhancements of existing facilities.

3.1.1 Proposed policy

3.1.1.1 In line with the spatial strategy the SWLP contains a new specific policy that encourages the improvement or extension of existing waste development to help provide additional capacity. This responds to the fact that there are a wide range of existing well-established waste developments in Surrey. Some of these existing operations will have the potential to increase waste management capacity whilst reducing harmful impacts.

| |
|--|
| <p>Policy 8 – Improvement or extension of existing facilities</p> <p>Planning permission for the improvement or extension (physical or temporal) of existing waste management facilities will be granted where:</p> <ul style="list-style-type: none"> i) The quantity of waste to be managed is equal to or greater than the quantity of waste currently managed on site. ii) Benefits to the environment and local amenity will result. |
|--|

3.1.2 Consistency with national planning policy

3.1.2.1 The NPPF states that planning policies should support development that makes efficient use of land – taking into account the identified need for housing and other forms of development¹¹.

3.1.3 Consistency with proposed Spatial Strategy

3.1.3.1 The proposed Spatial Strategy encourages the appropriate extension and enhancement of existing waste facilities.

¹¹ Paragraph 122 of the National Planning Policy Framework July 2018

3.1.4 How this will help meet the identified need

- 3.1.4.1 Through the enhancement or extension of existing waste sites a total of approximately 130,000 tonnes per annum of additional waste management capacity has been delivered since 2008 (See Appendix 1). This is a significant amount and it is probable that a similar order of magnitude could again be delivered through the current plan period. However, this is not certain and constraints on existing sites, not least through Green Belt Policy, will have the effect of limiting additional capacity.

3.2 Industrial Land Areas of Search

3.2.1 Proposed policy

- 3.2.1.1 The text of the SWLP policy which supports development of new waste management facilities on employment uses or industrial and storage purposes and seeks to provide additional guidance to developers by indicating those areas of land which may have potential through ‘Industrial Land Areas of Search’ is as follows:

Policy 10 – Areas suitable for development of waste management facilities

Planning permission will be granted for the development of facilities (excluding permanent deposit) at the following locations:

- i) On land identified as an ‘Industrial Land Area of Search’ as shown in the policies maps.
- ii) On any other land identified for employment uses or industrial and storage purposes by district and borough councils.
- iii) On land considered to be previously developed and/or redundant agricultural and forestry buildings and their curtilages.
- iv) On land that is otherwise suitable for waste development when assessed against other policies in the SWLP.

3.2.2 Consistency with national planning policy

- 3.2.2.1 The NPPW¹² states that “Waste planning authorities should identify, in their Local Plans, sites and/or **areas** for new or enhanced waste management facilities in appropriate locations. In preparing their plans, waste planning authorities should:
- Consider a broad range of locations including industrial sites, looking for opportunities to co-locate waste management facilities together and with complementary activities.
 - Give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages”.
- 3.2.2.2 The revised NPPF¹³ states that “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”. This includes, under paragraph 118, that planning policies “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified

¹² Paragraph 4 of the National Planning Policy for Waste (2014)

¹³ Paragraph 117 of the revised National Planning Policy Framework (2018)

needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”.

3.2.1 Consistency with proposed SWLP Spatial Strategy

- 3.2.1.1 The proposed Spatial Strategy indicates a preference for land that is likely to be suitable for waste development (not involving the permanent deposit) which includes sites and areas identified for employment uses, industrial and storage purposes, redundant agricultural and forestry buildings and their curtilages. This is consistent with the NPPW (2014) and revised NPPF (2018).
- 3.2.1.2 In order to provide additional flexibility, and encourage development in accordance with the Spatial Strategy, the Plan identifies broad types of areas which could potentially accommodate waste management development.

3.2.2 How this will help meet the identified need

- 3.2.2.1 Policy WD2: Recycling, Storage, Transfer, Materials Recovery and Processing Facilities (Excluding Thermal Treatment) in the current adopted SWP (2008) includes land used or allocated for industrial and storage purposes and Table 3.1 in the SWP 2008 provides a list of example industrial estates which are considered suitable for waste management. Monitoring the existing policy shows how new permissions have come forward under Policy WD2 on land identified as being for industrial or storage purposes since the current plan was adopted in 2008 (Appendix 2)
- 3.2.2.2 Through land identified as being for industrial or storage purposes a total of 38,500 tonnes of additional waste management capacity has been delivered. This is a relatively small amount but that may be because of:
- iv) The difficulty waste uses have when competing with higher value generating uses.
 - v) The particular operational needs of waste facilities that often require open storage which are not typically available on modern industrial estates.
 - vi) The capacity that has been delivered is for small scale facilities (<15,000 tonnes per annum) which can provide an important role in delivering waste management capacity in Surrey e.g. for niche recycling.
- 3.2.2.3 However, in light of the small amount of capacity delivered it is not considered appropriate for the SWLP to rely wholly on development on the Industrial Land Areas of Search to meet the need for additional capacity.

3.3 Allocated Sites

3.3.1 Proposed policy

- 3.3.1.1 In line with national planning policy and the spatial strategy, the SWLP contains a policy which supports development of new waste management facilities through allocated sites. These sites are either outside of the Green Belt and/or on land which is proposed to be removed from the Green Belt, or on land which is considered previously developed.

Policy 11a – Strategic Waste Site Allocations

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

A. On land outside the Green Belt:

- i) Land to the north east of Slyfield Industrial Estate, Guildford

B. On previously developed land within the Green Belt:

- i) Former Weylands sewage treatment works, Walton-on-Thames
- ii) Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead
- iii) Oakleaf Farm, Horton Lane, Stanwell Moor

C. On land proposed for removal from the Green Belt¹⁴:

- i) Land at Lambs Business Park, Terra Cotta Road, South Godstone

Proposals for development will need to demonstrate how the key development issues for each site have been addressed.

Policy 11b – Allocation of a Site for a Household Waste Materials Recycling Facility

Planning permission will be granted for the development of a facility to process mixed dry recyclable wastes collected from households as set out in the Surrey Joint Municipal Waste Management Strategy at Trumps Farm, Longcross.

Proposals for development in this location will need to demonstrate how the key development issues for the site have been addressed.

3.3.2 Consistency with national policy

3.3.2.1 The NPPW¹⁵ states that “waste planning authorities should identify, in their Local Plans, **sites** and/or areas for new or enhanced waste management facilities in appropriate locations.” The draft SWLP identified nine sites the Waste Planning Authority (WPA) were considering for new waste management use, the majority of these sites were in the Green Belt (Appendix 5).

3.3.2.2 The NPPW¹⁶ states that “Green Belts have special protection in respect to development. In preparing Local Plans, waste planning authorities, including by working collaboratively with other planning authorities, should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development.”

3.3.2.3 The NPPF requires that the authority demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before determining that exceptional

¹⁴ This site is proposed to be removed from Green Belt through the Tandridge Local Plan

¹⁵ Paragraph 4 of the National Planning Policy for Waste (2014)

¹⁶ Paragraph 6 of the National Planning Policy for Waste (2014)

circumstances have been met in order to allocate sites in the Green Belt. This will include assessment as to whether or not the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land.
- b) Optimises the density of development.
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

3.3.2.4 Hence, while nine sites were originally identified in the Draft SWLP, further work was undertaken to look at the requirements set out above. Specifically:

- a) Promoting land identified for industrial or storage purposes where these could potentially be suitable for waste use (where these are acceptable with policies in the development framework¹⁷).
- b) Encouraging redevelopment and intensification of existing sites in waste management use (where these are acceptable with policies in the development framework).
- c) Engaging with other authorities which have been identified as receiving waste from Surrey to find out if they are able to accommodate some of the identified need for development.

3.3.2.5 In addition to this, the NPPF¹⁸ states that “plans should give first consideration to land which has been previously-developed”. The county council reviewed the eight sites in the Green Belt identified in the draft SWLP (only one site was not in the Green Belt) and identified five that are previously developed¹⁹ as suitable for allocation (Appendix 3) and capable of meeting the assessed need for additional capacity in the event that insufficient opportunities are identified on land outside the Green Belt.

3.3.2.1 An additional site allocation has been included specifically for the development of capacity for the management of Dry Mixed Recyclables. This is consistent with Paragraph 019 of the Planning Practice Guidance (nPPG) that states: “circumstances when it may be more appropriate to prescribe a specific technology include...for any facilities to deal with municipal waste where a clear service development strategy is required”. Currently Dry Mixed Recyclable waste (DMR), is collected by the district and borough councils within Surrey and transported out of the county by road to facilities in Hampshire, Slough, North London, and Birmingham. The only site within Surrey that currently recycles dry mixed recyclables is the Grundon Facility at Randalls Road, Leatherhead.

¹⁷ This includes national policies, all policies in the Surrey Waste Local Plan and any relevant policies in the relevant district or borough local plan.

¹⁸ Paragraph 138 of the revised National Planning Policy Framework (2018)

¹⁹ Former mineral workings, that have been fully or substantively restored, or are in aftercare, were excluded on the basis that such sites are not classified as previously developed land in the NPPF

- 3.3.2.1 The export of DMR for management outside of Surrey is not consistent with the Surrey Joint Municipal Waste Management Strategy²⁰ that expects household waste arising in Surrey to be managed within the County. It is also inconsistent with the proximity principle as set out in the EU Waste Framework Directive and the National Planning Policy Framework. The WDA therefore has as part of its action plan (Appendix 1 of the strategy) to develop infrastructure within Surrey for recycling of DMR²¹.
- 3.3.2.2 The existing Leatherhead MRF is well located to serve the waste collection authorities towards the south east of the county, and so, in accordance with the proximity principle, the second MRF should be located towards the north west of the county. Site identification and evaluation work has revealed that land at Trumps Farm, Longcross would be suitable for the development of the second MRF.
- 3.3.2.3 While the Trumps Farm site is located within the Green Belt, it offers the most suitable, deliverable location for the WDA to develop a MRF to deal with approximately 120,000 tonnes per annum²² of DMR from households in this part of the county. The site has good access to the strategic road network and is located in an area near to existing waste management facilities.

3.3.1 Consistency with proposed Spatial Strategy

- 3.3.1.1 The proposed Spatial Strategy indicates a preference for land that is likely to be suitable for waste development (not involving the permanent deposit²³) which includes previously developed land and land not in the Green Belt. This is consistent with the NPPW (2014) and revised NPPF (2018).
- 3.3.1.2 The allocation of sites is intended to provide additional opportunities for the delivery of the waste management facilities needed to manage the equivalent amount of waste arising in Surrey. However, the majority of sites proposed for allocation are within the Green Belt and, unless these sites are removed from the Green Belt by the relevant district and borough, Green Belt land is not the most preferred location for these types of facilities.
- 3.3.1.3 The proximity principle expects a network of facilities to be developed that enable waste to be disposed of, and mixed municipal waste collected from private households to be recovered in, one of the nearest appropriate installations, by means of the most appropriate technologies

3.3.2 How this will help meet the identified need

- 3.3.2.1 Of the 14 allocated waste sites in the SWP 2008, five have been developed to provide additional waste management capacity (Appendix 3):
- i) Leatherhead Community Recycling Centre and Waste Transfer Station, Leatherhead (Part)
 - ii) Earlswood Depot, Earlswood (Part)
 - iii) Charlton Lane EcoPark, Shepperton

²⁰ The strategy can be found on the Surrey Waste Partnership website: <https://www.surreywastepartnership.org.uk/our-strategy>

²¹ Work area 9, Action 3: Investing in developing waste management infrastructure as appropriate, to give us more control over how materials are managed and help us ensure that we are getting the best deal environmentally and financially

²² Provided adequate mitigation can be provided following the outcomes of the Site Identification and Evaluation Report, 2018

²³ This includes landfill and landraising activities classed as either disposal or other recovery

- iv) Oak Leaf Farm, Stanwell Moor (part)
- v) Witley Community Recycling Centre, Godalming

3.3.2.2 The development of these five sites delivered a total additional operational capacity of approximately 360,000 tonnes per annum.

3.3.2.3 Two other sites have been granted planning permission but have not been implemented to date:

- Former Wisley Airfield, Guildford - for composting of 30,000 tonnes per annum. This site is now proposed for housing and unlikely ever to be fully implemented.
- Salfords rail depot, Reigate & Banstead – for recycling of incinerator bottom ash and waste transfer – capacity 230,000 tonnes per annum.

3.3.2.4 Based on historical patterns of delivery, a large proportion of new waste management capacity has been delivered from the development of allocated sites (Appendix 1). It is therefore expected that allocated sites will continue to play an important role in delivering the land needed for new waste management facilities in Surrey.

3.3.2.5 In total the selected sites amount to approximately 21 hectares²⁴. In order to meet the need for additional capacity for other recovery it is estimated that the amount of land needed is approximately 5.9 hectares²⁵.

3.3.2.6 It is acknowledged that not all sites allocated may come forward for waste uses, as, for example, commercial considerations will determine whether facilities will be built. However, the six proposed sites, five of which are on previously developed land (those in the Green belt), offer sufficient flexibility to ensure that Surrey's needs for additional waste management capacity are met.

3.4 Draft sites not carried forward

3.4.1 Consistency with national policy

3.4.1.1 As stated above the county council reviewed the eight sites included in the SWLP which were in the Green Belt and identified those that are previously developed²⁶. This resulted in a short list of six sites (see revised Policy 11 and Appendix 5) which will meet the addressed need in the event that there are insufficient opportunities identified outside land designated as Green Belt. The three discounted sites not proposed for allocation are as follows:

- i) Land to the west of Earlswood Sewage Treatment Works, Redhill
- ii) Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey
- iii) Land at Martyrs Lane, Woking

3.4.1.2 These sites were subject to detailed assessment which reflects their potential to accommodate waste development if there was an identified need.

²⁴ Excluding the land north east of Slyfield Industrial Estate which is required to accommodate the relocation of existing facilities.

²⁵ Based on calculations for site area in the Site Identification and Evaluation Report January 2019

²⁶ Former mineral workings, that have been fully or substantively restored, or are in aftercare, were excluded on the basis that such sites are not classified as previously developed land in the NPPF

3.4.2 Consistency with proposed Spatial Strategy

3.4.2.1 The proposed Spatial Strategy indicates a preference for the types of land that are likely to be suitable for waste development (not involving the permanent deposit) which includes previously developed land and land not in the Green Belt. Allocating additional sites, which are within the Green Belt and are not considered previously developed would not be consistent with the proposed Spatial Strategy.

3.4.3 Proposed policy

3.4.3.1 No specific policy is proposed for the Draft sites that have not been carried forward. However, there is no reason why these sites could not be developed in the future if there was an identified need under proposed policy 10 which includes on land that is otherwise suitable for waste development when assessed against other policies in the plan.

3.4.3.2 In this instance, any application will have to address the relevant policies in the plan, including, but not limited to:

- Policy 1 – Need.
- Policy 9 – Green Belt.
- Policy 14 – Development Management.

3.4.3.3 It will be clear in the background papers which support the SWLP that detailed assessment work was carried out on the nine sites and that in principle the remaining three sites which were not allocated remain acceptable for waste use provided that the applicant can demonstrate that ‘Very Special Circumstances’ exist to develop new waste management facilities on sites in the Green Belt (in line with Policy 9 – Green Belt).

3.4.3.4 In addition, the supporting text for Policy 11 includes reference to the three sites which were identified in the draft plan but are not proposed for allocation with explanation for their exclusion. This additional text therefore signposts the fact that these sites were identified as suitable in all respects other than consistency with national Green Belt policy and the fact that they are all greenfield sites.

3.4.4 How this will help meet the identified need

3.4.4.1 The SWLP should be sufficiently flexible to adapt to rapid change²⁷ and as such has strong criteria based policies which enable new waste management facilities to be developed in appropriate locations.

²⁷ Paragraph 11 of the revised National Planning Policy Framework (2018)

Appendix 1 - Permanent additional capacity delivered through sites with an existing waste use

| District or Borough | App Number | Date of decision | Operator | Site Address | Type of facility | Additional Capacity tpa ⁹ |
|---------------------|----------------|------------------|--|---|--|---------------------------------------|
| Epsom and Ewell | EP14/00958/CMA | 11/03/15 | Abal Waste Ltd | The Chalk Pit, College Road, Epsom | New building (62.4 m2) and use of land 0.017 ha for waste recovery activities - importation, deposit, storage, sorting, transfer and distribution of up to 10,400 tpa of C & I skip waste materials e.g. concrete, soils, hardcore, wood, plastic, paper and card, metals and green waste. | Recycling 10,400 |
| Epsom and Ewell | EP09/0237 | 20/11/09 | Abal Waste Ltd | Chalk Pit, College Road, Epsom | Importation, storage and transfer of asbestos. | Hazardous 3,650 |
| Guildford | GU09/1044 | 24/11/09 | John Gunner & Co Ltd | Sunnyside, Clasford Bridge, Aldershot Road, Guildford | The development of 0.3 hectares of the existing waste site as a materials recovery facility (MRF) | Recycling 12,500 ¹⁰ |
| Guildford | GU09/2057 | 26/03/10 | 1 st Place Skips (Formerly 20/20 recycling) | Chapel Farm, Guildford Road, Normandy | Use of site as a materials recovery facility for the receipt and processing of up to 30,000 tonnes pa of non-hazardous skip wastes | Recycling 30,000 |
| Tandridge | TA10/1351 | 13/01/11 | Wealden Services | Unit 8 Shawlands Court, Newchapel Road, Lingfield | Retrospective change of use of land from construction and demolition waste to allow the storage of construction and demolition waste and green waste; and the siting of a green waste shredder. | Recycling 590 |
| Tandridge | TA/2013/252 | 13/12/13 | LMD Services | The Gas Holding Station, Godstone Road, Whyteleafe | Permanent retention of 0.3 hectares for importation, treatment (including sorting, screening and blending), and exportation of suitable non-hazardous soils and hardcore. | C&D Recycling 75,000 ¹¹ |
| Woking | WO10/0334 | 18/06/2010 | SITA Surrey Ltd | Martyrs Lane Community Recycling Centre, Martyrs Lane, Woking | Improvement to CRC: Redevelopment and extension of Martyrs Lane Community Recycling Centre (CRC) and the construction of a new access to Martyrs Lane to create a split level facility for the receipt of civic amenity wastes. | Recycling 1,500 ¹² |
| <i>Subtotal</i> | | | | | | 133,640 |

Appendix 2 - Permanent additional capacity delivered on land used for industrial or storage purposes

| District | App Number | Date of decision | Operator | Site Address | Description of Development | Treatment Type | Additional Capacity tpa ²⁸ |
|------------|---------------------------|------------------|---|--|--|----------------|---------------------------------------|
| Guildford | GU17/P/01585 | 13/12/2017 | TGM Environmental | Cobbett Hill Earth Station, Cobbett Hill Road, Normandy, Guildford, Surrey GU3 2AA | Change of use to waste paper and waste cardboard recovery and transfer facility; overnight HGV parking. | Recycling | 15,000 |
| Guildford | GU08/0935 | 15/07/08 | B Nebbett & Son Ltd (Now Guildford Metal Exchange) | 14 Westfield Road, Slyfield Industrial Estate, Guildford, GU1 1RR | Change of use of building from B8 storage use to B2 general industrial use to allow the recovery and sorting of non-ferrous metals for recycling, together with the provision of a weighbridge and the erection of new palisade fencing. | Recycling | 12,000 |
| Guildford | GU12/P/02057 (09/2002) | 10/06/13 | Chambers Waste Management Plc | 20 Westfield Road, Slyfield Industrial Estate, Guildford, Surrey GU1 1SE | Change of use of 20 Westfield Road from yard with workshop to an extension of the existing waste management facility located at 22 - 24 Westfield Road including demolition of existing workshop/office and erection of 2,228m ² extension to materials recycling building, demolition of existing office at 22 - 24 Westfield Road and erection of replacement 2-storey office at 20 Westfield Road, and associated site improvements. | Recycling | 10,000 ²⁹ |
| Spelthorne | SP12/01265 | 13/02/13 | European Asbestos Services Ltd | Land at 111 Windmill Road, Sunbury on Thames, TW16 7EF | Change of use of approximately 140 square metres of land from light industrial to an asbestos waste transfer station comprising the importation, storage and transfer of asbestos and the provision of two sealed, lockable 16-yard containers. | Hazardous | 400 |
| Tandridge | TA10/1351 | 13/01/11 | Wealden Services | Unit 8 Shawlands Court, Newchapel | A retrospective change of use of land to the west of 'Area A' from construction and demolition waste to allow the storage of | Recycling | 600 |

²⁸ To nearest 100 tonnes

²⁹ Based on an increase of 10% vehicular movements

| District | App Number | Date of decision | Operator | Site Address | Description of Development | Treatment Type | Additional Capacity tpa ²⁸ |
|-----------------|--------------|------------------|------------------------|---|---|----------------|---------------------------------------|
| | | | | Road, Lingfield, Surrey RH7 6BL | construction and demolition waste and green waste; and the siting of a green waste shredder on 'Area A' and land west of 'Area A'. | | |
| Waverley | WA/2013/1223 | 17/10/13 | Refine Metals (UK) Ltd | Chiddingfold Storage Depot, Chiddingfold Road, Dunsfold, Godalming, Surrey, GU8 4PB | The importation, deposit, storage and transfer of discarded automotive parts (class B8); importation, deposit, storage and processing of discarded catalytic converters; together with external alterations to the former boiler room, additional vehicle parking spaces and installation of passive infrared lighting. | Recycling | 500 |
| <i>Subtotal</i> | | | | | | | <i>38,500</i> |

Appendix 3 - Permanent additional capacity delivered on land allocated in the Surrey Waste Plan 2008

| District | App Number | Date of decision | Operator | Site Address | Description of Development | Treatment Type | Additional Capacity tpa ³⁰ |
|--------------------|-------------------|------------------|-----------------------|---|--|-------------------------------|---------------------------------------|
| Mole Valley | MO11/0221 | 22/06/2011 | SITA Surrey Ltd | Leatherhead Community Recycling Centre and Waste Transfer Station, Randalls Road, Leatherhead, KT22 0BA | Redevelopment and extension of Community Recycling Centre and Waste Transfer Station, including a split-level recycling facility, enclosed Waste Transfer Station Facility, amended parking and access layout, weighbridge office and associated facilities. | Recycling | 1,100 ¹² |
| Reigate & Banstead | RE/P/13/01661/CON | 08/01/2014 | SITA Surrey Ltd | Earlwood Depot, Horley Road, Earlswood, Surrey, RH1 6PN | Development of a Materials Bulking Facility for the bulking, storage and transfer of up to 110,000 tonnes per annum of Municipal Solid Waste; welfare/fleet administration building; weighbridge office and 2no. weighbridges; re-use building; external covered bays with hardstanding storage area; reconfigured vehicle parking providing 38no. additional spaces; and ancillary infrastructure, all accessed via the existing Earlswood Depot. | Recycling | 110,000 |
| Spelthorne | SP10/0947 | 15/03/2012 | SITA Surrey Ltd | Charlton Lane EcoPark, Charlton Lane, Shepperton, TW17 8QA | Development of a Waste Management Eco Park, comprising: a Gasification Facility; Anaerobic Digestion Facility; Community Recycling Facility; Recyclables Bulking Facility; Education / Visitor Centre and Offices; Other Associated Infrastructure including Infiltration Basin and Landscaping; and the diversion of Public Footpath 70. | EfW Treatment Recycling | 55,000 40,000 - |
| Spelthorne | SP08/0992 | 19/11/2009 | Oakleaf Recycling Ltd | Oak Leaf Farm, Horton Lane, Stanwell Moor, TW19 6AF | The construction and use of a recycling, recovery and processing facility for construction and demolition waste on a site of approximately 9.4 hectares comprising: MRF building, site office and workshop; wheel wash and two weighbridges; lorry and car parking areas; storage areas; site entrance and access road; and landscaped bunds. | MRF | 150,000 |

³⁰ To nearest 100 tonnes

| | | | | | | | |
|-----------------|-----------|------------|-----------------|---|---|-----------|----------------|
| Waverley | WA08/2128 | 18/03/2009 | SITA Surrey Ltd | Witley Community Recycling Centre, Petworth Road, Witley, Godalming | The redevelopment and extension of Witley Community Recycling Centre and the construction of a new access to Rake Lane to create a split level facility for the receipt of civic amenity wastes with the demolition of highway buildings. | Recycling | 7,000 |
| <i>Subtotal</i> | | | | | | | <i>363,100</i> |

Appendix 4 - Permanent additional capacity which has been planning permission on land allocated in the Surrey Waste Plan 2008 but has not been delivered

| District | App Number | Date of decision | Operator | Site Address | Description of Development | Treatment Type | Additional Capacity tpa |
|--------------------|-------------------|------------------|----------------------|--|--|----------------|-------------------------|
| Guildford | GU08/1472 | 05/02/2010 | Land Investments Ltd | Former Wisley Airfield, Nr Ockham, Guildford | Construction of a fully enclosed in-vessel composting facility for the reception and processing of green, kitchen and animal wastes on a site of approximately 16.75ha, comprising; a composting building, control office, car parking facilities, landscaping, internal access roads, rainwater storage tank, leachate storage tank, package sewage treatment, diesel storage tank, attenuation pond, perimeter fencing, and new access off the A3 Ockham roundabout. | Composting | 30,000 |
| Reigate & Banstead | RE/P/13/00944/CON | 12/05/2014 | Days Aggregate | Salfords Depot, Southern Avenue, Salfords | Recycling of incinerator bottom ash. Waste Transfer | Recycling | 120,000 110,000 |

Appendix 5 - Table 8 Sites from draft plan stage which are being proposed for allocation

| Site Name | District / Borough |
|--|--------------------|
| Former Weylands Sewage Treatment Works | Elmbridge |
| Land to the north east of Slyfield Industrial Estate | Guildford |
| Land adjoining Leatherhead Sewage Treatment Works | Mole Valley |
| Oakleaf Farm Stanwell | Spelthorne |
| Land at Lambs Business Park | Tandridge |
| Land adjacent to Trumps Farm | Runnymede |

Table 9 Sites from draft plan stage which are no longer being proposed for allocation³¹

| Site Name | District / Borough |
|--|----------------------|
| Land to the west of Earlswood Sewage Treatment Works | Reigate and Banstead |
| Land adjacent to Lyne Lane Sewage Treatment Works | Runnymede |
| Land at Martyrs Lane | Woking |

³¹ based on the current need and Green Belt issues as set out in section 3.3.1 of this report