

Alternative Site Assessment Guidance

This guidance seeks to assist applicants and planning officers in understanding the purpose of and process for undertaking an Alternative Site Assessment (ASA) to support a planning application in the context of inappropriate waste management development in the Green Belt.

What is an Alternative Site Assessment?

The purpose of an ASA is to support a planning application for inappropriate waste management development in the Green Belt by identifying the most appropriate site for the development, and demonstrating that all other suitable and available land outside of the Green Belt has been properly considered and discounted in selecting the application site.

Essentially an ASA should: (1) establish and justify the area in which it is appropriate to search for an alternative site; (2) set out the search criteria to assess potential sites against; and (3) evaluate the suitability of alternative sites using objective weighting criteria. The ASA should be sequential in nature and focus on non-Green Belt land before considering other alternative sites within the Green Belt. It should also be proportionate to the nature and scale of the development proposed.

A robust ASA should consider whether there are alternative sites for both the proposed waste management development in its entirety and for the proposed development in a 'disaggregated form'. Although there may be benefits to the co-location of waste operations, a range of suitable alternative non-Green Belt sites could exist for individual waste management elements proposed.

When is an Alternative Site Assessment required?

The National Planning Policy Framework 2019 (NPPF) explains that the Government attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (paragraph 133). Paragraph 143 of the NPPF establishes a presumption against inappropriate waste management development in the Green Belt¹ because it is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'.

Policy 9 of the Surrey Waste Local Plan 2020 (SWLP) states that planning permission will not be granted for inappropriate waste development in the Green Belt, unless it is shown that very special circumstances exist. It states that 'very special circumstances' will not exist unless the potential harm caused to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations associated with the proposal, either on their own or in combination. This policy approach is consistent with paragraph 144 of the NPPF.

¹ Subject to the exemptions listed in paragraphs 145 and 146 of the NPPF

The preamble to Policy 9 explains that the following considerations may contribute to very special circumstances:

1. The lack of suitable non-Green Belt sites;
2. The need to find locations well related to the source of waste arisings;
3. The characteristics of the waste development including the scale and type of facility;
4. The wider environmental and economic benefits of sustainable waste management, including the need for a range of sites;
5. The site is identified as suitable for waste development under Policy 10 or Policy 11 of the SWLP;
6. The wider environmental benefits associated with increased production of energy from renewable sources.

Consequently, where inappropriate waste management development is proposed in the Green Belt an important and fundamental question is whether suitable land beyond the Green Belt exists which can be developed as an alternative to meet the same need.

To demonstrate compliance with Policy 9 an ASA will be required in most circumstances for waste management development in the Green Belt. However, an ASA may not be relevant to site specific proposals in some instances, including engineering operations such as landraising; composting on agricultural land for use on that same land; restoration of a mineral working by landfilling; and development of or at an existing waste management site.

Applicants are encouraged to consult with the County Planning Authority (CPA) using the CPA's [pre-application advice service](#) if they are unsure as to whether an ASA is required to support a planning application. Where an ASA is not considered relevant the applicant should justify this in the respective Planning Statement and/or Green Belt statement submitted in support of the planning application.

How to prepare an Alternative Site Assessment

For the CPA to judge that an ASA contributes to the demonstration of 'very special circumstances' in compliance with Policy 9 of the SWLP, it should provide clear evidence that the availability of suitable non-Green Belt sites has been rigorously assessed. There is no standard or adopted procedure for undertaking ASA's however the following stages are recommended and can be used as a guide to ensure a structured, logical and objective planning-based approach has been undertaken.

Recommended Stages of an Alternative Site Assessment

1) Identification of Search Area

The first stage of the assessment should be to identify a catchment area the proposed waste management development will serve, based on the need for the development in the context of relevant waste arisings, waste management capacity, transport links including the strategic road network, and any specific markets. The identification of a catchment area will need to be clearly justified within the ASA as it will provide a specific search area for the identification of suitable alternative non-Green Belt sites. Depending on the type of facility proposed and the location of the

catchment area it may also be relevant to consider sites in neighbouring counties, which will also need to form part of the identification and assessment of sites and will contribute to the development of a robust ASA.

2) Initial Site Identification

This stage of investigation should commence with an identification of a 'long list' of available sites within the identified catchment area, which have potential to accommodate the proposed development. This list is likely to comprise a combination of existing development sites, allocated development sites, active waste/mineral sites and previously developed land. The table below provides various sources of information which can be drawn on for this stage of investigation and the detail of any evidence gathered should be incorporated into the ASA to demonstrate a robust identification of sites process has been undertaken.

Potential sources of information

1. SWLP (2020), site allocations and site assessment reports: [SWLP Part 2 – Sites and Areas of Search](#); and Site Identification and Evaluation Report (available on request – contact mdf@surreycc.gov.uk)
2. Industrial Land Areas of Search (ILAS) as identified under Policy 10 of the SWLP (2020): [SWLP Part 2 – Sites and Areas of Search](#); and Industrial Land Areas of Search Identification Report (available on request – contact mdf@surreycc.gov.uk)
3. Surrey District/Borough adopted and emerging Local Development Plan Documents, proposal maps and existing and proposed employment land allocations/reviews: [Local Planning Applications](#)
4. Existing Business and Industrial Sites/Parks: [Estates Gazette](#)
5. Brownfield Register (held at District/Borough Council): [Local Planning Applications](#)
6. Satellite aerial photography/maps and Ordnance Survey (OS) Maps: [Surrey Interactive Map](#) and [Magic Maps](#).
7. Estate/Land agents: [Estates Gazette](#)
8. Critical review of existing ASAs that have been prepared in support of recent planning application for waste development in Surrey: [Online register of planning applications for Minerals, Waste and County Council Development](#).

3) Site Appraisal and Evaluation

The third stage of the ASA should comprise an assessment of the site-specific requirements for the proposed development against the 'long list' of available sites. There are various ways in which this can be achieved but the chosen approach should be clearly explained within the methodology section of the ASA; it should be sequential in nature (considering non-Green Belt sites before Green Belt sites) and it should include an explanation as to why rejected sites were not considered suitable for the proposed development in the context of the site-specific criteria identified. Below is a suggested list of key site-specific characteristics that may be applicable to the proposed development:

- Practical and Operational Matters – size of site, building requirements, open space requirements.

- Access – suitable vehicular access, proximity to strategic road network.
- Location - proximity to sensitive receptors (>250m), existing and future area of operations.
- Relationship to Market – proximity to any existing/remaining premises, suppliers, and markets.
- Designations – Area of Outstanding Natural Beauty (AONB), Conservation Area.

In addition, Appendix B (Locational Criteria) of the [National Planning Policy for Waste \(NPPW\) 2014](#) sets out a number of factors to consider in testing the suitability of sites and areas for waste development, which are set out in the table below.

| Criteria | Considerations (See Appendix B of NPPW for further information) |
|--|---|
| Protection of water quality and resources and flood risk management | Proximity of vulnerable surface and groundwater or aquifers, management of potential flood risk and risk posed to water quality. |
| Land Stability | Locations that are liable to be affected by land instability, will not normally be suitable for waste management facilities |
| Landscape and visual impacts | The potential for design-led solutions to produce acceptable development which respects landscape character; the need to protect landscapes or designated areas of national importance and localised height restrictions. |
| Natural conservation | Any adverse effect on a site of international importance for nature conservation (SPA, SAC's and RAMSAR sites), nationally recognised designations (SSSI's and NNR's) and natural improvement areas and protected species. |
| Conserving the historic environment | Potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting. |
| Traffic and access | Suitability of the road network and to the extent to which access would require reliance on local roads, the rail network and transport links. |
| Air emissions (including dust and odour) | Proximity of sensitive receptors, including ecological receptors, and to the extent to which adverse emissions/odour can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles. |
| Vermin and birds | Proximity of sensitive receptors, types of facility and waste managed at site. |
| Noise, light and vibration | The operation of large waste management facilities can produce noise affecting both inside and outside of buildings, including noise and vibration from good vehicle traffic. Intermittent and sustained operating noise may be a problem if not properly |

| | |
|------------------------------------|---|
| Criteria | Considerations (See Appendix B of NPPW for further information) |
| | managed particularly if night-time working is involved. Potential light pollution effects also need to be considered. |
| Litter | Can be of concern at some waste management facilities |
| Potential land use conflict | Likely proposed development in the vicinity of the location under consideration should be taken into account in considering the site suitability. |

3a) Scoring and site ranking

To rationalise the list of sites a scoring or ranking exercise should be undertaken, using objective weighting criteria (for example, those set out above) to score/rank each site.

Example 1 – Site scoring

This scoring system is based on the degree of difficulty in overcoming a particular constraint by mitigation or design rather than how the constraint is measured against other constraints. The site with a high score is more appropriate than a site with a low score, however care must be taken within the interpretation of the scores as the criteria are not necessarily comparable.

| Score | Interpretation |
|-------|---|
| -1 | Site has significant constraints |
| 0 | The site has constraints which could be overcome by mitigation and/or design measures |
| +1 | Site is strongly suitable |

Example 2 – Ranking based on specific criteria

For sites which have specific requirements, a simple ranking system can be used to assess the identified sites against the relevant criteria. The table has been colour coded to show each site against the key criteria. Green shows compliance and red shows non-compliance.

| Site | Area (Ha) | Within AONB | Distance to waste (km) | Proximity to sensitive receptors | Score |
|-------------------|-----------|-------------|------------------------|----------------------------------|-------|
| Thresholds | >1ha | No | <10km | >250m | |
| Identified Site 1 | 1.2 | Yes | 8 | >250m | 3 |
| Identified Site 2 | 0.1 | No | 26 | <250m | 1 |
| Identified Site 3 | 6 | Yes | 7 | <250m | 2 |
| Identified Site 4 | 0.2 | No | 28 | >250m | 2 |

4) Site Preference and Deliverability

The final stage of the evaluation process should comprise of an overview of the identified alternative sites and the preferred option. An individual assessment should be provided for each site identified, which is likely to be informed by a site visit, and details of the availability of the site for development should also be discussed.

Overview of document

The purpose of this document is to provide guidance to applicants and agents on the preparation of an Alternative Site Assessment, the advice contained within this document does not prejudice, nor is binding upon, any future decision taken by Surrey County Council or its Planning Committee.

This document will be regularly monitored and subject to periodic review.

Should you have any feedback or questions relating to this document and the information contained please contact our Technical Support Team on 020 8541 9897 or mwcd@surreycc.gov.uk