

Surrey County Council Waste Planning

Surrey Waste Local Plan

2018–2033

Capacity Estimate Scoping Statement

Version 1.0

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SURREY

Capacity Estimate Scoping Statement

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Executive Summary

- Surrey County Council, as the Waste Planning Authority (WPA), has identified a need to review and where necessary, update the current Surrey Waste Plan (SWP) which was adopted in 2008. The new plan, known as the 'Surrey Waste Local Plan' (SWLP) will cover the period from 2018 to 2033.
- As part of the preparation of the SWLP the council will assess changes to existing waste installations and of the need for additional waste installations.
- The purpose of this statement is to outline the methodology that is proposed for calculating current available capacity for waste management in Surrey. This report is intended to identify the challenges and assumptions used to apply this methodology.
- This methodology has been published for public consultation as part of the Issues and Options consultation. At this time we are seeking the views of stakeholders on this methodology ahead of developing baseline waste management capacities for the SWLP.
- During this time (September to November 2016) we are contacting operators to obtain information about capacity and current activities at their respective sites. This will ensure that the evidence used for plan preparation and monitoring of policies is accurate and up to date.

1 Introduction

1.1 Background

1.1.1 Surrey County Council needs to assess the current available capacity of consented waste management facilities within Surrey as part of its annual monitoring of the effectiveness of current plans and policies, and to inform the development of new plans and policies and support robust decision-making for new development.

1.2 Local Plan Development

1.2.1 The current Surrey Waste Plan (SWP) was adopted in 2008, and plans for the management of Surrey's waste until 2018. Surrey County Council is preparing a new Surrey Waste Local Plan (SWLP) which will cover the period from 2018 to 2033.

1.2.2 As part of the preparation of the SWLP there is a need to assess the quantity, status and nature of capacity of consented waste management facilities in the county. Without a sound understanding of the current available capacity, the requirements for future capacity cannot be determined.

1.2.3 The Waste Framework Directive (WFD) requires Local Planning Authorities to have regard to the principle of 'self-sufficiency'. This means that Surrey County Council should seek to ensure that the SWLP plans for the development of sufficient capacity to manage the equivalent amount of waste arising in Surrey.

1.2.4 In order to assess the future requirements for waste management infrastructure in Surrey over the plan period, it is necessary to¹:

- Understand waste arisings from within the planning authority area, including imports and exports.
- Forecast the waste arisings both at the end of the period that is being planned for and interim dates.
- Assess the waste management capacity required to deal with forecast arisings at the interim dates and end of the plan period.
- Identify the waste management capacity gaps in total and by particular waste streams

¹ National Planning Practice Guidance, paragraph 008, Reference ID 7-008-20140306

1.3 Annual Monitoring

- 1.3.1 National Planning Practice Guidance (nPPG) states that Waste Planning Authorities (WPAs) should use Annual Monitoring Reports (AMRs) to review the assessment in the Local Plan of changes to existing waste installations and of the need for additional waste installations.
- 1.3.2 Each WPA can develop its own waste management indicators, however at a minimum WPAs are expected to monitor:
- Why any allocated sites and areas have not been taken up as provided for in any existing plan, any relevant changes in environmental legislation and the emergence of new waste treatment technologies.
 - Changes to waste management capacities, permissions granted and additions to the stock of waste management facilities, by waste management type and by waste stream; sites that have been closed, completed, or that have reached the end of their lifetime and the need for additional waste infrastructure.
 - Annual waste arisings, and forecasts of future waste arisings from various sources.
- 1.3.3 The NPPW further emphasises that WPAs should monitor and report on take-up in allocated sites and areas, existing and changes in the stock of waste management facilities, and their capacity (including changes to capacity), the amounts of waste recycled, recovered or going for disposal.
- 1.3.4 The nPPG suggests that monitoring should address the capacity of sites subject to environmental permits and registered exempt sites. Currently Surrey's AMR does not identify capacity at exempt sites. This can be reviewed and corrected as necessary.

1.4 Purpose

- 1.4.1 The purpose of this statement is to outline the methodology that is proposed for calculating current available capacity for waste management in Surrey. This report is intended to identify the challenges and assumptions used to apply this methodology.

2 Challenges and assumptions

2.1 Defining capacity

- 2.1.1 The meaning of waste capacity can be interpreted differently, but for its purposes Surrey County Council interprets waste capacity to mean the maximum tonnage of waste that a site is capable of managing in a year, without any improvements, assuming maximum working within the constraints of existing planning consents and other considerations e.g. permitted input limits.
- 2.1.2 Hence, any operational restrictions intended to control the impacts (e.g. noise) of a site such as the number of heavy goods vehicle (HGV) movements, hours of operation, and the volume of waste that can be imported into a site, should be taken into account. Such matters would normally be conditioned through a planning consent or specified in an environmental permit if one applies.

2.2 Lack of consistent data

- 2.2.1 Estimating existing waste site capacity is hindered by a lack of consistent data for all waste sites. Data is not available for every site and the volume of waste handled at some sites are only controlled through the imposition of a cap on the number of lorry movements permitted by the planning consent.
- 2.2.2 Where data is available, this often relates to the annual amount of waste managed at a site rather than the actual capacity of the site to manage waste e.g. Environment Agency (EA) waste data interrogator (WDI). The WDI is based on returns that most permitted site operators make to the EA.
- 2.2.3 The quality of information submitted is dependent on reliable waste measurement methods being in place e.g. a weighbridge, and an operator having a sound knowledge of the source and type of waste received and ultimate destinations. Data on inputs to permitted sites that do not report through the WDI e.g. EfW plants can be obtained separately from the EA.

2.3 Site Closures

- 2.3.1 Currently there is no definite mechanism for notification of site closures, other than when environmental permits are surrendered to the Environment Agency. Surrey County Council relies on information from districts and boroughs and from the Enforcement Team's monitoring visits.

2.4 Changing technology

- 2.4.1 Changes in technology have resulted in smaller facility footprints or more efficient processing plant and equipment. This can result in changes to capacity of sites where they have undergone some change, either an extension or new development, which may have increased the amount of waste that can be managed at this site.

2.5 Changing Market Conditions

- 2.5.1 Demands for greater separation of materials in response to market demand and restrictions on storage or ultimate disposal means that the footprint occupied by a site may actually accommodate a reduced throughput. For example plasterboard must now be separated from skips and might either be processed onsite or sent for separate management offsite.
- 2.5.2 Similarly the recent introduction of controls by the Environment Agency on the volume of potentially combustible waste stored onsite may mean site capacities are substantially reduced.

2.6 Exemptions

- 2.6.1 An exempt waste operation is a waste operation that meets certain limiting criteria as being exempt from needing an environmental permit. To qualify as exempt the operation must be registered with the Environment Agency (or Local Environmental Health in a limited number of cases).
- 2.6.2 Each registration lasts only three years so relatively good information is available on the number of exemptions registered at any one time. However as these sites do not have to provide returns no information is available on how much waste these sites are managing. In addition, as registration is free, we cannot be certain that the exempt sites are actually active.
- 2.6.3 Being registered as a waste exemption does not remove the need to apply for planning permission if the activity represents a material change of an existing permitted use not covered by GPDO.

3 Methodology

3.1 Data Sources

- 3.1.1 There are a wide range of possible data sources available to calculate capacity, which comprise:
- Capacity limit included within a planning condition imposed on a grant of planning permission.
 - Capacity or waste quantity to be handled included in the supporting information submitted with a planning application.
 - Capacity limit or information on waste handled contained in a report to the planning committee.
 - Information from the Waste Disposal Authority on the capacity of their sites.
 - Amount of waste handled derived from the EA's WDI as a maximum over 5 years' data (between 2011 and 2015).
 - Operational limits on the volume of waste handled included on the Environmental Permit issued by the EA.

- Charging bands limits applied to sites under Environmental Permits issued by the EA (N.B. these are very wide so of less use than other sources).
- Total remaining non inert landfill capacity published annually in the EA's Waste Data Tables.
- Total remaining inert landfill capacity published annually in the EA's Waste Data Tables.

3.2 Survey of Operators

- 3.2.1 Experience of sending out annual survey forms to aggregate recycling site operators to ascertain the capacity of their site has provided Surrey County Council with a strong starting point for running a similar process with waste management facility operators about their sites.
- 3.2.2 This experience includes:
- Challenges with definitions of capacity as outlined above resulting in operators providing different figures.
 - Operators being unsure of throughput or overall capacity of their site.
 - General difficulties with contacting operators and receiving responses in a timely manner.
- 3.2.3 Surrey County Council will be contacting individual site operators with a bespoke survey which will ask for details of the site, including capacity. This will give operators a chance to provide first-hand information about their site and make sure that the council has the best available information as they prepare the new SWLP.
- 3.2.4 In addition, the survey will hopefully also generate discussions between operators and Surrey County Council to identify needs and opportunities for new or additional capacity.

3.3 Calculating Capacity

- 3.3.1 In the first instance the council will try to engage with operators through the survey. This information is first hand and can be considered to have a high confidence.
- 3.3.2 If information is available in planning consents or associated documentation e.g. in applications, officer reports, planning conditions or from monitoring of the site, there can be a relatively high degree of confidence in the figure. Therefore this figure will be used unless there is evidence to suggest it is not fit for purpose.
- 3.3.3 For landfill, data provided annually by the EA in the waste data tables for available voidspace will be used to provide a measure of remaining capacity going forward. There is high confidence in these figures however it is not disaggregated for individual sites.
- 3.3.4 The EA issues environmental permits for the use, treatment, storage, recovery or disposal of waste . Environmental permits often include an operational limit for the quantity of waste that may be received or subject to particular operations being carried out. There is high/medium confidence in these figures moderated by annual input data.

- 3.3.5 Where reliable data is only available on the annual amount of waste handled e.g. through returns provided from the operator to the EA, the WPA will use the highest annual figure from the previous five years data. This should capture any changes to site efficiency, extensions etc. that have occurred during this time.
- 3.3.6 The WPA assumes that the annual maximum throughput measured does not equate to the capacity of the site. The WPA will include an additional 20% of headroom above the amount of waste reportedly handled. This approach is considered to provide a more realistic estimate of the maximum theoretical capacity of these sites and would give rise to a medium level of confidence in the final figure used.
- 3.3.7 Where no data is available for a site e.g. there is no data on inputs due to the site not being operational, and no limit is provided in planning documents, the WPA, will make an estimate based on the site area and the nature of the waste managed. The WPA may use available data from a comparative site, i.e. one of a similar size which is managing the same type of waste using a similar process, to derive an estimate of site capacity. The WPA will have medium/low confidence in this information.
- 3.3.8 Where environmental permits do not include an operational limit for the quantity of waste that may be received or subject to particular operations being carried out, there are charging band limits that might be referred to. However these limits are provided in broad bands and do not take into account operational requirements. Confidence in this figure is low and therefore the WPA has decided not to base capacity information on these figures. This is summarised in the table below:

Table 1 Method Confidence

Method	Description	Confidence
Survey		High
Planning Permission	Capacity information is available in planning documents including Planning conditions, Decision Notices and officer's reports to committee.	High
Landfill Void space	Published annual EA waste data tables recording the total amount of remaining void space available will be used.	High
Environmental Permit	Where operational limits are set by waste type and/or operations or quantity per day inputs.	High to Medium
Tonnes Managed	Data on the annual volume of waste handled per annum is available for several sites from planning documents such as Officer Reports, or the EA's WDI. Where data is derived from the WDI, a maximum value over the past 5 years is used. All estimates are adjusted for head room (+20%).	Medium
Comparative Assessment	Available data from a comparative site i.e. one of a similar size which is managing the same type of waste using a similar process will be used to provide an estimate of site capacity.	Medium/Low
Environmental Permit	Limits provided in a series of bands for charging purposes only.	Low

3.4 Units

3.4.1 Typically, capacity will be reported as tonnes per annum (tpa). For some waste management facilities this requires assumptions and conversions to be used to calculate a value of tonnes. Some cases where conversion rates apply are:

- Metal recycling and scrap metal facilities where planning documents refer to a limit on number of vehicles
- Specialist facilities e.g. fluorescent lights where planning documents refer to a limit on units per year
- Landfill where information is provided as void space in m³

3.4.2 Where conversion rates are applied this will be clearly noted in any results presented.

3.5 Exemptions

- 3.5.1 The amount of waste handled at exempt sites can be estimated using the number of each type of exemption and the limit provided by the EA. This will indicate the maximum that could be handled at exempt sites. The register of exempt activities will be obtained annually from the EA and included in the Surrey County Council Planning Service AMR.
- 3.5.2 The nPPG advises that if a waste planning authority is concerned that exempt sites are having a significant impact on local capacity, it may wish to investigate this further. Surrey County Council could seek to use surveys or other methods to investigate if necessary.

4 Quality Assurance

4.1 Data Sources and Assumptions

- 4.1.1 Capacity figures will be collected using multiple methodologies, e.g. Survey, Planning Permission, Tonnes Managed, and Environmental Permit data, where available. Different values will be compared to ensure that the capacity figure selected represents the most robust estimate. For example:
- All information provided by operators will be checked against a Planning Permission capacity figure and annual Tonnes Managed capacity figure.
 - Sites with both a Planning Permission capacity figure and annual Tonnes Managed capacity figure will be compared to validate the assumption used by Surrey County Council, as the WPA, for 20% headroom.
 - Where a Tonnes Managed capacity figure is substantially below the capacity figure using Planning Permission or Planning Permit, assumptions that a Planning Permission figure is the best available information for that site will be considered.
 - Environmental Permit data will be referred to in the absence of definitive planning permission limits and moderated with annual Tonnes Managed data.
- 4.1.2 Where the annual input of a facility is relied upon it is assumed that site operator returns and information provided by operators is accurate and has been incorporated into the WDI correctly by the EA. Surrey County Council, as the WPA, is unable to verify the accuracy of this data but the data sources used are in accordance with the nPPG for waste and can be considered the best available information.

5 Next Steps

5.1 Consultation

- 5.1.1 This methodology has been published for comments alongside the Issues and Options consultation for the preparation of the SWLP. The council will be seeking the views of stakeholders, including the waste industry, on this methodology ahead of developing a baseline for the SWLP.
- 5.1.2 During this time we will also seek to contact operators to obtain information about capacity and the current activities at their respective sites. This will ensure that the evidence used for plan preparation and monitoring of policies is accurate and up to date.
- 5.1.3 Following the public consultation we will review and make any changes that are necessary. We will then follow this methodology to estimate waste management capacity requirements for the SWLP and when updating the capacity reported each year in the Planning Service AMR.