Matters Statement: Matter 2 Overall Assessment of Need (Policy 1)

23 August 2019
**Issue:** Whether the identified waste requirements are justified and based on sound assessment of need?

**Existing capacity**

17. Is the evidence of existing waste management facilities robust and sufficiently detailed? Does it include details of location, type of facility, licence/permit details, capacity information including maximum capacity, waste sources, outputs, residues and destination, where appropriate? (PPG ID: 28-024-20141016)

**Council’s Response:**

Is the evidence of existing waste management facilities robust and sufficiently detailed?

17.1 The *Waste Needs Assessment (WNA) (2019) (SWLP 8)* is based on robust and detailed evidence relating to existing waste management facilities, which is contained within the Appendices of the WNA report. Appendix 2 of the *Annual Monitoring Report (2017/18) (SWPS-03)* also includes a list of existing facilities that provides the address of each facility.

Does it include details of location, type of facility, licence/permit details, capacity information including maximum capacity, waste sources outputs, residues and destination, where appropriate?

17.2 Appendix 2, Table 34 of the *WNA (SWLP 8)* contains information relating to the capacity of existing waste sites within Surrey. This contains information on:

- Site name
- District or borough it is located in
- Facility treatment type
- Facility treatment category
- Throughput
- Capacity (maximum assumed)
- Close date (where relevant)

17.3 The background spreadsheets (not published) contain the following further information relating to existing waste management facilities:
18. Are details of existing major disposal and recovery installations clearly shown on the Policies Map? (PPG ID: 28-027-20141016 and 28-039-20141016)

Council’s Response:

18.1 AM17 in the table of Proposed Additional Modifications (SCCD-002) sets out that two additional policies maps are proposed to be added to SWLP Part 1. One of which will be an enlarged version of the map currently in the SWLP Part 1 (Figure 1 p. 7) and the other will display existing strategic waste management facilities\(^1\) in the county. These modifications will ensure that Policies Maps of the SWLP clearly show details of existing major disposal and recovery installations.

19. How have the targets and needs included in the Joint Municipal Waste Management Strategy (JMWMS) been taken into account in the SWLP? What assessment has been made of the existing capacity of the network of community recycling centres (CRCs) and how this may change over the plan period?

Council’s Response:

How have the targets and needs included in the Joint Municipal Waste Management Strategy (JMWMS) been taken into account in the SWLP?

19.1 Section 1.1.12 of the Waste Needs Assessment (SWLP 8) sets out the role of the JMWMS and relevant targets in the JMWMS (SWPS-12) which are to be achieved by 2019/20\(^2\).

19.2 The JMWMS (SWPS-12) targets for municipal waste include a bespoke recycling and recovery rate of 70% by 2019/20 (this includes recovered street sweepings and

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\(^1\) Defined in the Consultation Protocol as any allocated site within the Surrey Waste Plan 2008, with a treatment capacity greater than 20,000 tpa or part of a strategic waste management network (such as CRCs).

\(^2\) 2019/20 is the middle year of the JMWMS period – targets will then be reviewed.
recovered non-clean wood but not the recovery of other residual waste) and a diversion rate from landfill of 100% by 2019/20.

19.3 The targets set in the SWLP for municipal waste (called Local Authority Collected Waste) are 60% recycling by 2020 rising to 70% by 2030 and 2% Disposal of waste to land by 2020 falling to 1% in 2030 (Table 3).

Assessment of the existing capacity of the CRC network and how this may change over the plan period

19.4 Data relating to the capacity of the fifteen CRCs in the county was obtained from Suez, the county council’s waste contractor. This data is set out in the Waste Needs Assessment (SWLP 8) Table 34.

19.5 It has been assumed that the capacity of these sites will remain the same over the plan period. Surrey County Council (the Council) currently has no plans to reduce capacity at CRCs although the need to reduce costs is under constant review. This has to be seen in the context of a significant reduction in waste handled at CRCs – falling from approximately 145,000 tonnes in 2013/14 to approximately 100,000 tonnes in 2017/18. This reduction follows the changes to the service that were introduced during 2016/17 including revised opening days and hours, opening reuse shops at larger sites and introducing charges for larger amounts of non-household waste.

20. In what circumstances may the capacity of existing waste management facilities change? What is the likelihood of this occurring? How has this been assessed?

**Council’s Response:**

20.1 It is anticipated that capacity of waste management facilities could change as a result of:

- Improvement, reconfiguration or expansion
- Redevelopment of the site for another use
- Sites with temporary permission closing

20.2 Improvement, reconfiguration or expansion of facilities is encouraged under Policy 8 and so the SWLP allows for such eventualities. In light of the constraints on land in Surrey it is quite likely that capacity could change (increase) in light of these matters. Section 1.4.4 of the SWLP describes how new waste management capacity has been
provided in the past and notes that, between 2008 and 2017, over 130,000 tonnes of additional capacity was provided at existing sites. The Council has estimated that a similar magnitude of additional capacity could come forward at existing sites over the next 15 years even allowing for Green Belt constraints (estimated at between 200,000 and 600,000 tpa).

20.3 The redevelopment of a waste management site for non-waste uses is generally discouraged by the SWLP (Policy 7) that seeks to safeguard existing waste management capacity. In light of this, and the demand for the management of waste in Surrey, it is considered that redevelopment of existing sites which currently provide significant waste management capacity is generally unlikely. The Council’s records show that over the last five years nine waste sites have been closed. However, these have been small sites with a use that was established many years ago (several scrapyards) in a location that would now be considered inappropriate for waste management.

20.4 The closure of temporary facilities was factored into the Waste Needs Assessment (SWLP 8). This assumed that such facilities would operate until the expiry of the planning permission and no further. This is a conservative approach as in reality applications may be received, and permitted, for extensions to the temporary period.

21. How has the capacity of sites exempt from environmental permits been assessed? Is this capacity considered to be significant?

Council’s Response:

21.1 Consideration of how C&I waste managed at facilities exempt from the need for a Environmental Permit has been taken into account is set out in paragraphs 2.2.2.8 to 2.2.2.11 of the Waste Needs Assessment (SWLP 8).

21.2 In particular, paragraph 2.2.2.8 notes that exempt sites have not been included in the estimates of C&I waste arising or the estimates of existing capacity, consistent with the updated DEFRA national reconcile method for estimating C&I waste arisings due to the risk of double counting. This risk occurs as waste managed at exempt sites frequently requires further management at permitted sites, or waste that is initially managed at permitted sites is then treated at exempt sites, and so counting this capacity as existing capacity may result in an underestimate of the capacity that needs to be planned for.
21.3 The way in which the management of C, D & E waste at exempt sites has been taken into account is also set out in the Waste Needs Assessment (SWLP 8) at section 2.3.2, particularly paragraphs 2.3.2.6 and 2.3.2.7. A survey of sites registered under exemption U1 (Use of Waste in Construction) was undertaken and this suggested that an average of 600 tonnes per site could be added to the assessment of arisings. The capacity of these exempt sites was not included in the assessment of existing C, D & E Waste management capacity as it was felt this might place undue reliance on the management of C, D & E Waste via sites exempt under category U1, the exact capacity of which is uncertain, and so result in an underestimation of the C, D & E Waste management capacity gap. It is understood that not including this potential capacity within the capacity gap calculation is likely to mean that the need for additional sites is over-estimated but it is considered that on balance this is preferable as it ensures flexibility. This approach will be carried forward in the review of the Surrey Minerals Plan which will include consideration of the need for allocation of sites managing C, D & E waste.

21.4 The use of data regarding registered exempt sites in the estimates of C&I waste and C, D & E Waste arisings and capacity was carefully considered (and involved bespoke surveys of exempt sites) but, other than for the estimate of C, D & E Waste capacity, the information gleaned was insufficiently conclusive to allow valid assumptions to be made. Fundamentally, the approach taken to accounting for the capacity of sites exempt from environmental permits is considered to be robust and in line with nPPG (Paragraph: 025 Reference ID: 28-025-20141016).

Forecast of waste arising over the plan period

22. Waste arisings have been forecast at the end of the plan period and at specific points within it. Is it clear when new or replacement facilities are likely to be required during the plan period?

Council’s Response:

22.1 Yes. The waste arisings are forecast for the end of the plan period and at key points within it. This then informed a calculation of the need for waste management capacity at the end of the plan period and at key points within it, which is shown in SWLP Part 1 (Tables 4 to 7).

22.2 It is considered that the tables indicating the need for capacity at the end of the plan period and at key points within it (SWLP Part 1), demonstrates when new or
replacement facilities are likely to be required. The need shown demonstrates what capacity is required throughout the plan period and the plan provides opportunities for the market to respond. This approach ensures that there is no brake on capacity coming forward subject to new development ensuring that waste is managed in accordance with the waste hierarchy.

22.3 Table A3-1, Appendix 3 of the Site Identification and Evaluation Report (SWLP 9) sets out the land requirements for each waste management stream at key points during the plan period, based on the identified capacity gap.

22.4 The provision of additional capacity will be monitored against requirements for this capacity in the Annual Monitoring Report (SWPS-03). Specific arrangements are set out in the SWLP for related monitoring the implementation of Policies 1, 2, 3, 5, 6, and 8.

23. The Waste Needs Assessment April 2019 (WNA) (SWLP 8) details the factors that have informed forecasts of future local authority collected waste (LACW) arisings and the preparation of the growth profile? Do these factors clearly and robustly justify the chosen scenario?

Council’s Response:

23.1 Section 2.1.2 of the WNA (SWLP 8) shows that the following factors have informed the forecasts of future local authority collected waste arisings using a growth profile:

a) Household or population growth; and

b) Waste arisings per household or per capita

23.2 This is based on national Planning Practice Guidance (Paragraph 030 Reference ID: 28-030-20141016).

23.3 The nPPG (Paragraph: 031 Reference ID: 28-031-20141016), suggests that the growth profile be prepared through a staged process:

a) Calculate arisings per head by dividing annual arisings by population or household data to establish short and long-term average annual growth rates per household; and,

b) Factor in a range of different scenarios, e.g. constant rate of growth, progressively lowering growth rates due to waste minimisation initiatives.

23.4 Three scenarios were modelled (see WNA (SWLP 8) Table 10):

• Scenario 1: No change
• Scenario 2: Medium growth (Based on the median annual rate of change in waste per household)

• Scenario 3: High growth (Based on the 75% annual rate of change in waste per household)

23.5 The range of values arrived at after modelling was between 500,000 tonnes and 566,000 tonnes by 2035 (see Figure 3 of the WNA (SWLP 8)).

23.6 The high growth value was selected as being the worst-case, but realistically possible, estimate of future arisings, with a waste % change of 0.3%.

23.7 These likely scenarios only consider a possible range of circumstances that may arise. The chosen approach reflects the need to build flexibility into the new SWLP, which is key to enable the plan to respond to changes in circumstances over the plan period, as set out in the NPPF 2019 (Paragraph 11 a) and the national Planning Practice Guidance (Paragraph 038 Reference ID: 28-038-20161016). The potential for circumstances to change is accommodated by the selection of the high growth value.

24. The WNA also details the factors that have informed forecasts of future arisings in other wastes, including commercial and industrial (C&I), construction, demolition and excavation (CD&E), hazardous waste, and other types of waste, and the preparation of the respective growth profiles. Are the chosen scenarios clearly justified and robust?

Council’s Response:

Commercial & Industrial Waste:

24.1 The nPPG (Paragraph 032 Reference ID: 28-032-20141016) states that WPAs can prepare growth profiles, similar to municipal waste, to forecast future C&I waste arisings, however, in doing so, they should:

• “Set out clear assumptions on which they make their forecast, and if necessary forecast on the basis of different assumptions to provide a range of waste to be managed

• Be clear on the rate of growth in arisings being assumed. Waste planning authorities should assume a certain level of growth in waste arisings unless there is clear evidence to demonstrate otherwise”

24.2 In order to determine the growth profile, an annual rate of C&I waste was estimated using information in the Surrey Local Economic Assessment (LEA) (SWPS-17).
24.3 Three scenarios were modelled:
  - Scenario 1 – No change
  - Scenario 2 – Medium growth (LEA Baseline projection for Surrey 2.8%)
  - Scenario 3 – High growth (LEA Increased globalisation scenarios 3.1%)

24.4 The modelling concluded that the quantity of waste requiring management by 2035 ranged between 682,000 tonnes and 1,055,000 tonnes (WNA (SWLP 8), Figure 4).

24.5 In order to retain flexibility in the Plan, the worst case scenario (1,055,000 tonnes) is being planned for. It should be noted that this is only slightly above the medium growth scenario of 1,019,000 tonnes. As stated in the WNA (SWLP 8) (Para 2.2.2.13), this forecast is based on information available at the time. Therefore, the Plan will retain flexibility by planning for the worst case scenario and then adjusting down in the light of AMR monitoring to enable it to respond to changes in circumstances.

Construction Demolition and Excavation Waste:

24.6 The methodology applied for C,D&E waste is modified from the Defra Methodology for Calculating C,D&E waste for Waste Statistics and Waste Framework Directive reporting purposes. It is set out in the WNA (SWLP 8).

24.7 The calculations for future C,D&E waste arisings, were informed by the nPPG\(^3\) which states that waste planning authorities should start from the basis that net arisings of C & D waste will remain constant over time. In Surrey, the rate of household construction has remained stable and, taking into account planned housebuilding, it is anticipated to remain so in future (See Surrey Local Aggregates Assessment 2017 (SWPS-15) Figure 5). As a proxy for the construction industry as a whole this supports a no growth scenario. Some major projects, such as Heathrow expansion, will likely come on stream during the Plan period but these will need specialist planning. Arisings are also likely to be reduced by improved construction techniques and by the economic imperative for reusing inert material on the site of development projects.

24.8 As a result, the growth rate scenario that expects there to be no change in arisings has been adopted, therefore for the purposes of assessing the need for additional waste management capacity the Plan is working on the basis of arisings of C,D&E waste being 2,494,000 tonnes per annum.

\(^3\) nPPG Paragraph 033 Reference ID: 28-033-20141016
Hazardous Waste:

24.9 Data on the quantities of hazardous waste arising is obtained from the Hazardous Waste Data Interrogator (HWDI) maintained by the Environment Agency. The nPPG states that since existing data on hazardous waste arisings is likely to be robust, waste planning authorities should plan for future hazardous waste arisings based on extrapolating time series data (Paragraph: 034 Reference ID: 28-034-20141016).

24.10 In order to determine the growth profile, given the variation in hazardous waste arisings in Surrey over recent years the recommended approach to extrapolate the time series data was considered to be inappropriate (See WNA (SWLP 8) paragraph 2.4.2.3). Data from the UK as a whole showed that in 2012 over half of the hazardous waste came from the commercial and industrial sector (Table 17 of WNA (SWLP 8)), thus hazardous waste arisings are considered likely to increase in line with commercial and industrial waste arisings as a whole.

24.11 Growth scenarios were modelled using the baseline figure for hazardous waste arising (53,000 tonnes) and the annual growth rates (for C&I waste) for each scenario listed in Table 18 of the WNA (SWLP 8). The range of values was between 53,000 and 88,000 tonnes by 2035. The high growth scenario figure of 88,000 tonnes was considered to be the appropriate value to plan for because it ensures flexibility in the Plan, enabling it to respond to changes in circumstances.

24.12 Other types of waste:

- Wastewater – The management of wastewater is primarily the responsibility of the regulated water utility companies, with the provision of treatment facilities usually being considered on a case by case basis. Following consultation with the relevant water utility companies, it was not considered necessary to make strategic provision for such facilities.

- Agricultural waste – The amount of agricultural waste managed at permitted facilities which arose in Surrey in 2017 was 35,000 tonnes, with the majority being organic waste managed at facilities across the border in West Sussex. A substantial proportion of this waste will be managed through exempt facilities for which there is limited information available. The total amount of agricultural waste produced in Surrey is not considered sufficient to justify the identification of land for strategic waste management facilities dedicated to this sector.

- Nuclear waste and Radioactive Waste – Surrey has no major nuclear waste producers within it, however, there are many hospitals and industrial, educational and research establishments that produce small quantities of low or very low level radioactive wastes. Most of this waste is safely disposed of with
municipal, commercial or industrial wastes. Within the Plan appropriate policies are included to address the potential for these types of applications.

24.13 Also see the response to Q. 39

25. Given the number and scale of identified potential significant housing developments and major infrastructure projects that may come forward within the plan period, are the assumptions about CD&E waste arisings requiring off-site management realistic? Does the scenario for CD&E waste arisings provide for sufficient flexibility in waste management capacity provision?

Council’s Response:

Are the assumptions about CD&E waste arisings requiring off-site management realistic?

25.1 The C,D&E waste arisings have been calculated (see WNA (SWLP 8), section 2.3) in compliance with the nPPG (Paragraph: 033 Reference ID: 28-033-20141016). The approach taken was selected due to the limited nature of the data available.

25.2 Sections 2.3.2.11 to 2.3.2.13 of the WNA (SWLP 8) provide justification for the assumptions about the need for off-site CD&E waste management in line with nPPG para. 033.

Does the scenario for CD&E waste arisings provide for sufficient flexibility in waste management capacity provision?

25.3 The scenario for CD&E waste arisings is based on nPPG (Paragraph: 033 Reference ID: 28-033-20141016).

25.4 It should be noted that the most recent calculations for CD&E waste arisings are considerably higher than that calculated for recent previous years. As this CD&E waste arisings generally remain constant at a slightly lower level, it is more likely that the forecast arisings planned for in the local plan are towards an arisings estimate that overestimates actual requirements. Also see the responses to Q21 and Q24.

Future Capacity
26. Is the methodology used for calculating future capacity robust? The future capacity for recycling and other capacity (WNA, Table 25) indicates that the current capacity can be maintained across the lifetime of the plan. Is this assumption reasonable?

Council’s Response:

Is the methodology used for calculating future capacity robust?

26.1 Yes, the methodology used for calculating future capacity is robust.

26.2 Future capacity was calculated in the WNA (SWLP 8) using the methodology recommended in the nPPG (Paragraph: 024 Reference ID: 28-024-20141016), specifically using capacity information (from throughput data, license or planning permission) and information available regarding the lifetime of facilities (for example, time dependent planning permission).

The future capacity for recycling and recovery indicates that the current capacity can be maintained across the lifetime of the plan. Is this assumption reasonable?

26.3 There is no information to indicate that the current capacity for recycling and other recovery (excluding aggregate recycling and recovery to land) will not be maintained across the lifetime of the plan (also see response to Q.20).

Capacity gap

27. How does the SWLP make provision for sufficient capacity across different types of waste management facility, to support the objective of encouraging the management of waste further up the waste hierarchy?

Council’s Response:

27.1 The SWLP makes for provision for sufficient capacity for all types of waste management facility by providing positive policies that allow for such facilities to come forward. Policies 2, 3, and 5 and 6 specifically allow for additional recycling and other recovery to come forward. Policy 6 allows for landfill capacity to come forward only if “The waste to be disposed of is the residue of a treatment process and cannot practicably and reasonably be re-used, recycled or recovered”. Policy 7 is concerned with safeguarding existing facilities which are already contributing to the provision of capacity. Policy 8 facilitates extensions and improvements to existing facilities to
ensure that existing facilities might increase their capacity and/or make a greater contribution to the Plan’s strategic objective (SO2 – see section 3.2.1) of ensuring that waste is managed further up the waste hierarchy.

27.2 Policy 1 is an overarching policy that ensures waste is managed at the highest point on waste hierarchy that is practicable, meaning that, facilities which allow for the recycling of waste are generally preferred over those which allow other forms of recovery.

27.3 An assessment *(Waste Needs Assessment (SWLP 8)) of how waste can be practically moved up the hierarchy in terms of how it is managed in Surrey has revealed that, currently, there is undue reliance on disposal by landfill and so additional ‘other recovery’ capacity needs to be developed in Surrey to allow this waste to managed further up the waste hierarchy (this is summarised in Section 1 of the SWLP Part 1). This assessment includes consideration of ambitious but deliverable targets for landfill diversion and recycling. To provide certainty that additional capacity of the types required will be developed, the SWLP identifies the following:

1. Specific types of land which could be developed for this purpose;
2. Areas of search within which it is considered that suitable land could exist for the development of such capacity; and,
3. Specific sites (allocations).

27.4 The approach taken in the SWLP is consistent with NPPW which 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”.

28. Does the SWLP identify a range of planned capacity for each type of waste? To be positively prepared, is it necessary for the identified capacity requirement to be included within Policy 1 – Need for Waste Development and clearly identified within the SWLP?

**Council’s Response:**

*Does the SWLP identify a range of planned capacity for each type of waste?*

28.1 While the SWLP does not identify ranges, it does identify (in section 1) a quantum of capacity that it is considered is required to be developed to ensure the main types of waste (Local Authority Collected Waste (LACW), Commercial and Industrial waste
and Construction, Demolition and Excavation waste) are managed at an appropriate level of the waste hierarchy.

28.2 The requirement for capacity will change over time as changes to the levels of capacity within Surrey occur. As described in paragraph 5.1.1.2, the Annual Monitoring Report (AMR) (SWPS-03) will provide an annual update of waste management capacity requirements against which the need for proposals can be assessed. This update will take account of revised predictions of future waste arisings and the level of existing capacity. In the event that this monitoring reveals significant changes to the types of waste management required then the Plan may be reviewed to account for this.

28.3 Any proposal will need to demonstrate how it meets the needs for waste management capacity set out in the latest AMR, or, if the need does not align with that set out in the AMR a clear justification of why that is the case and, therefore, why the facility is required.

To be positively prepared, is it necessary for the identified capacity requirement to be included within Policy 1 – Need for Waste Development and clearly identified within the SWLP?

28.4 No. The identification of capacity requirements within policy would result in the SWLP being inflexible and could lead to inappropriate decisions where the need for proposals is judged against capacity requirements which are out of date due to changes in waste arisings and available capacity.

29. The WNA, paragraphs 4.2.2.2 - 4.2.2.6, identifies a potential need for additional recycling capacity towards the end of the plan period, a potential requirement for composting facilities, a need for additional Energy from Waste (EfW) capacity, readily available waste transfer stations (WTS) and materials recovery facilities (MRF), and a potential for increased capacity for anaerobic digestion. How does the SWLP address these requirements?

Council’s Response:

29.1 Consideration of how the SWLP addresses each of the capacity requirements mentioned in the question is set out as follows:

a) Potential need for additional recycling capacity towards the end of the plan period
• Table 29 shows how the assessment of future capacity requirements suggests that a capacity gap in recycling would not arise, however, in light of the facts that the predicted surplus by 2035 is a small one and the SWLP promotes recycling over other forms of waste management it is not unreasonable to suggest, as in paragraph 4.2.2.2, that a need for additional recycling capacity may arise towards the end of the plan period. Indeed, proposals for recycling capacity which resulted in the diversion of additional waste from landfill and/or from ‘other recovery’ would be supported by Policy 1. The SWLP provides for additional recycling capacity primarily through Policy 2. This policy specifically considers the types of land that would be suitable for the development of recycling capacity and references Policy 10 and Policy 11a and 11b.

• Section 5.3.4 of the SWLP (and associated Policy 11b) addresses a particular need within Surrey for a facility to enable the recycling of household waste. This policy identifies a site at Trumps Farm that is considered suitable for development, subject to an alternative suitable site not being available outside of the Green Belt. Land allocated by policy 11a would also be suitable for the development of recycling capacity, however such land has primarily been identified to facilitate the development of additional ‘other recovery’ capacity for which a capacity gap has been identified.

b) Potential requirement for composting facilities

• While green waste arising in the LACW stream in Surrey is currently composted, there are limited facilities within the county and so this largely occurs elsewhere. In light of this it may be possible to make a case for the development of an additional composting capacity within the County. Proposals for such capacity which would result in a decrease in the number and length of vehicle movements would be supported by Policy 15. As composting is at the same level as recycling on the waste hierarchy, proposals which resulted in the diversion of additional green waste from landfill and/or from ‘other recovery’ would be supported by Policy 1. The suitability of land associated with proposals for additional composting capacity would be assessed against Policy 2 of the Plan, and, as mentioned in paragraph 5.2.2.6, policies in section 5.4.

c) Need for additional Energy from Waste (EfW) capacity

• Energy from Waste falls within the ‘other recovery’ tier of the waste hierarchy for which Table 29 of the SWLP shows there is a capacity gap that
increases over the plan period. Policy 2 provides for the development of such capacity on certain types of land and references policies 10 and 11b. Policy 11b, which identifies specific allocations has been included to help provide additional certainty that the capacity gap for ‘other recovery’ of waste will be met.

d) A potential for increased capacity for anaerobic digestion (AD).

- Paragraph 4.2.2.5 of the WNA (SWLP 8) notes that no specific need for additional anaerobic digestion capacity has been identified but such capacity could be required to help manage additional separate collections of food waste. As with the other types of capacity mentioned above, proposals for such capacity are provided for by Policy 2. As Anaerobic Digestion of food waste is at the same level as recycling on the waste hierarchy, proposals which resulted in the diversion of additional food waste from landfill and/or ‘other recovery’ of waste would also be supported by Policy 1.

29.2 As a general point, other policies of the Plan will help address the need for all of the types of capacity mentioned above. In particular Policy 7 ensures that existing capacity is safeguarded and Policy 8 allows for improvements and extensions to existing facilities to occur.

30. Is there a demonstrable need for specific additional capacity for dry mixed recyclables (DMR)?

Council’s Response:

30.1 Yes. The additional information\(^4\) supporting the allocation of Trump’s Farm specifically for DMR sets out the current and future need. At present approximately 70,000 tonnes of DMR per annum is sent out of Surrey for processing, in some cases as far as Birmingham. The only site within Surrey that processes DMR is operating near capacity and therefore additional capacity within the county is required if the DMR waste is to be managed closer to the source of arisings.

\(^4\) See Trumps Farm: Waste Local Plan Supporting Information RPS Group (ED-03)
31. In relation to the potential expansion of Heathrow Airport, reference is made to the potential closure and replacement of the Lakeside Energy from Waste (EfW) facility. How is it intended to manage the timing of this replacement and what measures would be put in place to address any gap in provision?

Council’s Response:

31.1 As part of the Heathrow Expansion proposals, the Lakeside EfW would be demolished to allow construction of a third runway and though the Lakeside facility is not within Surrey, a small proportion of the waste sent outside of the county to recovery facilities (10% or 21,200 tpa) (WNA section 3.2.1.2 (SWLP 8)) currently goes to this facility. It is recognised that this capacity will need to be replaced.

31.2 The Council is engaging with Heathrow on their expansion DCO proposal through bilateral meetings, formal and informal consultations, and the Heathrow Strategic Planning Group. Discussions regarding impact on waste planning in the south east of England have also been held at SEWPAG. Through this engagement, the Council is working to support the re-provision of capacity lost by the demolition of the Lakeside EfW without a break in capacity. It is understood that HAL, Slough Borough Council and Grundons (operator) are working to secure this and a planning application for a replacement facility has been submitted.

31.3 The Council’s position on this issue is published in the response it has provided to Heathrow Airport Limited as part of the first consultation on Heathrow Expansion⁵. The position of waste planning authorities in the South East is being documented in a SEWPAG Joint Position Statement (draft) (SWPS-13).

31.4 It should also be noted that the SWLP would be able to address the potential deficit left for the waste exported from Surrey, if the capacity at this site were not re-provided, through Policy 1 and Policy 2.

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32. The WNA, paragraph 4.2.4.1 indicates that currently there is insufficient capacity for CD&E recycling in the later part of the plan period. Is the policy approach proposed to address this issue, with an absence of specific allocations, justified and robust, taking into account the future excavation waste arisings identified in the North London Boroughs SOCG (SOCG-02, paragraph 5.4)?

Council’s Response:

32.1 See the document Approach to C, D & E Recycling (ED-04). This provides detailed justification for dealing with site allocations as part of the Surrey Minerals Plan Review (due to commence in 2020).

32.2 Surrey has a significant amount of void space close to London following mineral extraction and considerable quantities of inert material will be required to facilitate its restoration. This could include excavation waste arisings from London.

33. Reference is made, within the evidence base, to an intended review of CD&E recycling need and capacity as part of the proposed review of the Surrey Mineral Plan. Is this deferred approach to the assessment of need justified and is the SWLP justified and positively prepared in this regard?

Council’s Response:

33.1 See the document Approach to C, D & E Recycling (ED-04) which explains why a review of the need for and capacity of C, D & E recycling is appropriate to undertake as part of the review of the Surrey Minerals Plan. The Council’s adopted Minerals and Waste Development Scheme (SWLP 22) states that the Minerals Plan review Issues and Options consultation take place in spring 2020 with adoption in summer 2023.

33.2 Nevertheless, a review of current CD&E recycling need and capacity has been undertaken as part of the SWLP to demonstrate that there is unlikely to be a shortfall in capacity in the short to medium term pending the Minerals Plan review.
34. The recovery of inert waste to land capacity is reliant on mineral sites coming forward during the plan period. How has the likelihood of this occurring been assessed? Reference is made, in footnote 9 of the SWLP, to planned sites yet to have planning permission or become operational. Is there a reasonable likelihood of these sites coming forward? How robust is the reliance on these sites to address the capacity gap in recovery to land for inert waste?

Council’s Response:

34.1 There is sufficient capacity in existing mineral sites to accommodate the necessary material that cannot be recycled over the plan period: 8.75 million tonnes.

34.2 Working has also commenced at one additional site – Mercers South.

34.3 Planning applications for two other sites which would require progressive restoration are being considered:

- Milton Park Farm – due to be considered by Planning & Regulatory Committee later this year.
- Watersplash Farm - considered by Planning & Regulatory Committee 10 July 2019 and permitted subject to conditions and the prior completion of a S106 agreement.

34.4 In total it is anticipated that these additional three sites would require a further 6.7 million tonnes of inert restoration material.

35. The WNA, paragraph 4.2.3.1, identifies a capacity gap for the disposal of non-inert waste to land towards the end of the plan period, following the scheduled closure of Patteson Court landfill in 2030. Does the evidence demonstrate that the SWLP would be effective in addressing the identified requirement for additional capacity without a specific allocation?

Council’s Response:

35.1 Yes. Policy 6 has been included specifically to address any proposals which came forward to meet any ongoing need for the disposal of non-inert waste to land. This sets out the circumstances under which a landfill (or landraise) site would be acceptable. As no sites were promoted for disposal of non-inert waste to land there is currently no hard evidence that such capacity would be developed in Surrey and so
it has not been possible to justify allocation of a particular site in the SWLP. Indeed, without a willing landowner any allocation would not be deliverable and any attempt to rely on such an allocation would therefore be unsound.

35.2 As is explained in the SEWPAG Joint Position Statement on Non Hazardous Landfill (SWPS-01), the number of sites for the disposal of non-inert waste to land has decreased dramatically over the last 20 years which means that such sites serve a much wider area and it is entirely possible that existing, or new, capacity will serve Surrey’s related requirements towards the end of the Plan period.

35.3 It is also the case that the absence of specific provision for landfill will act as a powerful incentive to develop other preferred forms of waste management capacity that are further up the waste hierarchy.

35.4 Please also see the response to Q. 55.

36. Is the absence of proposed sites for hazardous waste arisings justified? The SOCG with the North London Boroughs identifies the main waste export from north London to Surrey is hazardous waste, with existing landfill capacity in the wider south east declining. The existing landfill site at Patteson Court is due to close in 2030, but the SOCG indicates that the resulting waste management capacity required is expected to be provided elsewhere. (SWLP 27 paragraph 5.14) Is the plan positively prepared in this regard?

Council’s Response:

Is the absence of proposed sites for hazardous waste arisings justified?

36.1 Yes. Different types of hazardous waste have different properties which mean they require management in different ways. Due to its nature and the relatively small quantities, the management of hazardous waste is a specialist activity and the catchment for such facilities can be up to national in scale. Patterns of hazardous waste management are well established to meet management requirements not just for hazardous waste arising in Surrey but on a regional, and national basis.

36.2 Whilst existing hazardous waste facilities serve management needs for waste arising in Surrey, they also manage waste from a wide area and such capacity is safeguarded by Policy 7. An assessment of hazardous waste arisings in Surrey identified the facilities where this waste is being managed and, those authorities with these facilities in their areas, have confirmed that such management will be able to
continue over the plan period. This is set out in the following agreed Statements of Common Ground:

- **SoCG Between Surrey County Council and Surrey districts and boroughs (SOCG-01)**
- **SoCG Between Surrey County Council and North London Boroughs (SOCG-02)**
- **SoCG Between Surrey County Council and Kent County Council (SOCG-03)**
- **SoCG Between Surrey County Council, East Sussex County Council, Brighton and Hove City Council and South Downs National Park Authority (SOCG-04)**
- **SoCG Between Surrey County Council and West Sussex County Council and South Downs National Park Authority (SOCG-05)**
- **SoCG Between Surrey County Council and Hampshire County Council and South Downs National Park Authority (SOCG-06)**
- **SoCG Between Surrey County Council and Buckinghamshire County Council (SOCG-07)**
- **SoCG Between Surrey County Council and Suffolk County Council (SOCG-08)**
- **SoCG Between Surrey County Council and Natural England (SOCG-09)**

The SOCG with the North London Boroughs (SWLP 27) identifies the main waste export from north London to Surrey is hazardous waste, with existing landfill capacity in the wider south east declining. The existing landfill site at Patteson Court is due to close in 2030, but the SOCG indicates that the resulting waste management capacity required is expected to be provided elsewhere. (SWLP 27 paragraph 5.14) Is the plan positively prepared in this regard?

36.3 Hazardous waste managed at Patteson Court travels considerable distances and this means that, following its closure, and in the event that no alternative facility has been developed in Surrey, the waste that was managed at this site would be transported to an alternative facility which could also be a considerable distance away from its place of production. Paragraph 5.2.6.5 of the SWLP notes that “In some cases existing landfills for hazardous waste may serve a national market”. As stated in paragraph 5.2.6.4, the SWLP does not assume that an alternative facility will not be provided for in Surrey and Policy 6 would allow such a facility to be developed in a suitable location.
37. The WNA, paragraph 2.5.1.1, indicates that it is not considered necessary to make strategic provision for wastewater facilities within the SWLP and no further land is proposed to be allocated in this respect. Is the SWLP justified and positively prepared in this regard? How does this relate to the proposed allocation 5.1 (Land to the north east of Slyfield Industrial Estate, Guildford), which identifies the site as proposed to facilitate a replacement for the existing sewage treatment works, amongst other waste management facilities?

Council’s Response:

37.1 Thames Water are the statutory sewerage undertaker for a large part of Surrey. Thames Water supported Policy 12 at the Draft Plan stage and suggested small changes to the wording. These were taken into account.

37.2 No requirement for additional land was identified by Thames Water (Response to Reg 18 Consultation 7 Feb 2018) other than for the land to the North East of Slyfield Industrial Estate. This site is primarily required for the relocation of the existing Guildford STW in association with the Slyfield Area Regeneration Plan (SARP) and is supported by Thames Water - including the land for future expansion.

38. How would the policies of the SWLP ensure that new and existing sites can be developed to provide Surrey’s ongoing wastewater and associated sludge management requirements without adversely impacting the environment or the community? (WNA, paragraph 2.5.1.2)

Council’s Response:

38.1 Policy 14 – Development Management - will ensure that all potentially adverse impacts associated with wastewater treatment and sludge management are satisfactorily addressed. These will include any potential impacts on residential amenity – including from odour.
39. How would the policies of the SWLP be effective in addressing the need for potential additional capacity in agricultural waste, anaerobic digestion, nuclear waste and radioactive waste, should that need arise?

Council’s Response:

39.1 The waste hierarchy applies equally to all these types of waste and so proposals for their management would be assessed against Policy 1. The facilities which manage these types of waste are similar in nature to those that manage LACW and C&I waste and on this basis related polices which provide for the management of these waste streams, in particular policy 2, will also apply to the management of the more specialised streams.

39.2 The need to consider the management of agricultural waste is as a result of the Waste Management (England and Wales) Regulations 2006 which implemented the revised EU Waste Framework Directive. This brought agricultural waste under legislative control for the first time. Prior to this, much of this waste stream was managed on the site of production or other land under a farmer’s control through the use of ‘farm tips’. It is now more likely to be managed in the same way as commercial and industrial waste streams. As such some of the waste arising from this sector previously managed through informal methods can be expected to be introduced into the formal waste management system and therefore require additional capacity to be provided (and planned for). Section 2.5.2 of the Waste Needs Assessment (Ref SWLP8) specifically considers agricultural waste arisings and notes that in light of their low quantities the identification of land to manage such a waste stream is unlikely to be justified.

39.3 In terms of ‘Radioactive waste’, this is categorised into nuclear and non-nuclear wastes. Nuclear wastes are from the nuclear power industry while “non-nuclear” wastes are generally from medical facilities and educational establishments. Radioactive wastes are further categorised according to their ‘activity’. National Planning Practice Guidance (PPG) confirms that waste planning authorities should plan for the management of Low Level Radioactive waste (LLW) (Paragraph: 013 Reference ID: 28-013-20141016). The Council would address any need for the management of Low Level Radioactive Waste primarily using Policies 1 and 2 which

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would equally apply to the management of such waste as the types of development associated with its management would present similar land use issues to those related to recycling and recovery in general.

39.4 The provision of anaerobic digestion facilities is addressed in response to Q. 29.

40. Given the identified gaps in capacity, does the evidence demonstrate that the aim of Net Self-Sufficiency for Waste Management in Surrey is reasonably likely to be deliverable over the plan period? What assumptions have been made in this regard?

Council’s Response:

40.1 The Plan seeks to ensure net self-sufficiency. This means providing sufficient waste management infrastructure to deal with the equivalent amount of waste to that arising in Surrey, taking account of existing safeguarded capacity.

40.2 The Plan accepts that it is not practicable to deal only with waste produced in Surrey and that cross-boundary waste movements, including from London, are necessary to support the viable and efficient operation of waste management facilities. Hence, whilst the Plan seeks to facilitate net-self-sufficiency, this does not preclude Surrey’s waste being managed outside of Surrey. Nevertheless, given the current waste management capacity is over 1.5 million tpa (Table 25 WNA (SWLP 8)) the additional capacity required to achieve net-self-sufficiency of approximately 0.15 mtpa (Table 4 SWLP) is of an order of magnitude that can be realistically achieved given the policies and allocated sites in the Plan and the history of provision demonstrated by the development of approximately 0.9 mtpa of additional waste management capacity in Surrey over the past 10 years (See SWLP 11).

40.3 It is estimated that by the end of the Plan period there will be shortfall of capacity of facilities for other recovery of waste (Table 4 SWLP). As new waste management capacity is developed the capacity gap will change and this will be monitored in the Annual Monitoring Report (AMR) (SWPS-03). The need for facilities will be assessed against the results of monitoring in the latest AMR.