

Surrey County Council Waste Planning

Surrey Waste Local Plan

2018–2033

Assessment of Suitable Land Scoping Statement

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SURREY

Assessment of Suitable Land Scoping Statement

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Executive Summary

- The current Surrey Waste Plan (SWP) was adopted in 2008. The SWP 2008 allocates a number of sites for future development as waste management facilities.
- 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, the 'Surrey Waste Local Plan' (new SWLP) will cover the period from 2018 – 2033.
- The purpose of this report is to outline the proposed methodology for assessing the suitability of land for inclusion as sites in the new SWLP.
- Surrey County Council have identified a wide range of potentially suitable land, however as part of the 'Issues and Options' consultation the council are also seeking nominations for suitable land under a 'Search for Suitable Land'.
- The identified land and any nominated land will be subject to assessment using the methodology outlined in this report. The assessment of suitable land will be undertaken in two stages based on locational opportunities e.g. sources of waste arising, and constraints e.g. Green Belt.
- The first stage of assessment is an initial sieving exercise based on primary criteria and will exclude land that are unlikely to be deliverable. Land which passes the first stage will then each undergo more detailed assessment using secondary criteria to determine whether the land could potentially be used for waste related development.
- Any potential land will be considered against its ability to meet future waste management capacity requirements and its compliance with our draft spatial strategy. Overall, we need to identify sufficient land to ensure facilities can be delivered sufficient to manage the equivalent of waste arising in Surrey in the most sustainable way.
- Surrey will refine the methodology in light of any relevant comments received during the 'Issues and Options' consultation. The methodology will be included as part of the evidence base for the new SWLP.

1 Introduction

1.1 Background

- 1.1.1 The SWP 2008 allocated a number of sites for future development as waste management facilities. The process of identifying appropriate locations for future waste management operations was carried out during 2004, 2005 and 2006, and examined a wide range of sites, and evaluated their suitability against a range of criteria, including matters such as proximity to arisings, accessibility, amenity, and environmental constraints and considerations.
- 1.1.2 The assessment process was documented in a number of reports. These formed a key part of the evidence base for the SWP, and were scrutinised through the process of independent examination.
- 1.1.3 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 Surrey Waste Local Plan (new SWLP) will cover the period from 2018 to 2033. This report considers the approach to site identification and the extent to which the process used to identify sites in the SWP is still fit for purpose.

1.2 Purpose

- 1.2.1 The purpose of this report is to outline the methodology that is proposed for assessing the suitability of land for inclusion as sites in the new SWLP. This report is intended to evidence how land will be considered and the rationale for taking forward or rejecting land at the initial stages of plan preparation. In addition, how Strategic Environmental Assessment (SEA) will be used in the assessment of suitable land process.

2 Previous Assessment Work

2.1 Introduction

2.1.1 The assessment process utilised during the development of the SWP 2008 has already been subjected to a preliminary review. This was part of the process of evaluating the consistency of the adopted SWP 2008 with the National Planning Policy Framework (NPPF),

2.1.2 The review of the previous assessment process considered the following key questions:

- i) the consistency of the evaluation and assessment process;
- ii) the accuracy of the information relied upon in that process; and
- iii) the extent to which individual sites were subjected to a comparable level of scrutiny in the course of the process.

2.1.3 Conclusions of this review are discussed below.

2.2 Consistency of process

2.2.1 In the previous evaluation and assessment process sites that were subject to 'detailed assessment'¹, were each characterised against a standard set of criteria e.g. 'site located in the Green Belt', 'site located in an area likely to flood', 'site is next to a local nature conservation site'. This then fed into a scoring exercise and helped to inform analysis of the a given site's strengths, weaknesses and potential.

2.2.2 The review of the previous assessment process identified a lack of clarity which leads to a concern that the scoring process may not have been applied consistently. There were, in some cases, inconsistencies in the application of the scores for various criteria (e.g. available scores for a criterion quoted as '0', '3' and '5', but a number of sites given scores of '1' or '4' with no explanation for the variation or how it should be interpreted offered).

2.3 Accuracy of information

2.3.1 Given that the bulk of the work on the previous assessment process was carried out during 2004 and 2005 it is reasonable to assume that there may be differences between the data used at that time and that which is current on the same or similar topics (e.g. flood risk, water quality, status of nature conservation sites, traffic levels, background noise, etc.).

2.3.2 It is therefore not necessarily appropriate to rely on the original evidence base used in the previous assessment. Nevertheless, at the point in time at which decisions were being made to allocate sites in the SWP 2008 it would have provided a relatively accurate account of the conditions and constraints relevant to the individual sites.

¹ around 60 sites from which those allocated in the SWP 2008 were chosen

2.4 Comparability of scrutiny

- 2.4.1 There are variations in the depth of analysis to which individual sites were subjected as part of the previous assessment process, typically those sites which were eventually included in the SWP 2008 were scrutinised most closely, whilst others discounted at an earlier stage of the process were less heavily scrutinised.
- 2.4.2 It would seem reasonable to not dedicate time and resources on the evaluation of a site for which there is an over-riding constraint (a 'showstopper') that would in the normal course of events preclude its inclusion as a future location for waste development (e.g. a site has already been developed for an alternative use).
- 2.4.3 Nevertheless, sites were identified in the site assessment reports that could have been classed as reasonable alternatives to preferred locations although they were not subjected to a comparable level of evaluation to those that were ultimately allocated for development. However it does seem that the information available at the time did allow for decisions on the selection of sites to be made with appropriate rigour.

3 Environmental Directives

3.1 Introduction

3.1.1 The following European directives affect the assessment of suitable land:

- Waste Framework Directive
- Habitats Directive
- Wild Birds Directive
- Strategic Environmental Assessment Directive

3.1.2 These are considered further below.

3.2 Waste Framework Directive

3.2.1 The Waste Framework Directive (WFD) requires Planning Authorities to have regard to the principles of 'self-sufficiency' and 'proximity'. This means that Surrey County Council should ensure that the plan includes sufficient capacity to manage the equivalent waste arising in Surrey and facilities are available to manage this waste close to its point of arising.

3.2.2 Therefore new capacity is likely to be needed by those key settlements generating the most waste and which are most likely to experience the highest growth and change in the future. The national Planning Practice Guidance (nPPG) highlights several key factors that will influence the locational needs of facilities, such as:

- The distribution of waste arisings and flows of waste
- Physical and environmental constraints
- Local transport infrastructure and sustainable transport

3.3 Habitats Directive and Wild Birds Directive

3.3.1 Articles 6(3) and 6(4) of the EU Habitats Directive (Directive 92/43/EEC) require that prior to their adoption plans and programmes be assessed in respect of their capacity to give rise to significant adverse impacts on the features of qualifying interest (e.g. particular habitats or species) of sites that have been designated for protection under the EU Habitats Directive or the Wild Birds Directive (Directive 79/4069/EEC as codified by Directive 2009/147/EC).

- 3.3.2 Those requirements are implemented in the UK via Regulation 61 of the Conservation of Habitats & Species Regulations 2010 (Statutory Instrument 2010 No.490), as amended by the Conservation of Habitats & Species Amendment Regulations 2012 (Statutory Instrument 2012 No.1927).
- 3.3.3 This includes a requirements to carry out ‘appropriate assessment’ when it is considered possible that a potential area of suitable land allocated for waste use might impact on the protected features of a designated habitat. The categories of sites to which the requirement for ‘appropriate assessment’ applies in the UK include:
- Special Areas of Conservation (SACs) – designated for habitats, species or a combination of habitats and species under the provisions of the EU Habitats Directive;
 - Special Protection Areas (SPAs) – designated for the presence of populations of wild birds under the provisions of the EU Wild Birds Directive;
- 3.3.4 As a matter of policy in the UK, the appropriate assessment process also takes account of Ramsar Sites, which are designated as wetlands of international importance under the 1971 Ramsar Convention.

3.4 Strategic Environmental Assessment Directive

- 3.4.1 The EU Directive (2001/42/EC) on the environmental assessment of plans and programmes requires that certain public sector plans and programmes be subject to systematic assessment of their impacts on the environment prior to their adoption and implementation.
- 3.4.2 The Directive seeks to provide for the protection of the environment, by ensuring that the impacts and effects of proposed development, and all reasonable alternatives, be taken account of in the plan or programme preparation process. The Directive is transposed into English law by means of the Environmental Assessment of Plans & Programmes Regulations 2004 (Statutory Instrument 2004 No.1633).

3.5 Environmental Directives and Implications for Plan Preparation

- 3.5.1 It is important that Surrey County Council takes account of its responsibilities under the Habitats Directive, Wild Birds Directive and Strategic Environmental Assessment Directive. The council need to account for the special status of SACs, SPAs and Ramsar Sites when the council are looking at locations that may be suitable for waste related development and any unacceptable impacts that such development could have.
- 3.5.2 In addition, the council need to ensure that the council consider all reasonable alternatives. The Assessment of Suitable Land methodology set out below will ensure that the council have a robust framework for decision making and that the council consider any land proposed in a consistent way.

4 Land Requirements

4.1 Policy considerations

- 4.1.1 The National Planning Policy for Waste (NPPW) 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 NPPW provides locational criteria² which authorities should consider when determining the suitability of land.
- 4.1.2 In line with the NPPW, any land allocated should be located, designed and operated to minimise potential adverse impacts on the general amenity of local communities and the natural and historic environment.
- 4.1.3 As well as through the allocation of land, the suitability of development in certain locations of facilities will be guided by locational policies and overarching spatial policies. In recognition that not all waste facility types would be appropriate in all areas, and to ensure flexibility, locational policies will be included in the new SWLP to guide the location of waste development during the plan period.
- 4.1.4 Identifying a land that is suitable as a site for a waste management facility does not mean that this land is automatically considered to have met all requirements such that planning permission can be granted. Any land that is proposed will still need detailed assessment as part of the planning application process and this may include the need for an Environmental Impact Assessment.

4.2 Land Requirements

- 4.2.1 In order to ascertain the amount of land that needs to be allocated to accommodate new waste management facilities in Surrey over the plan period, it is necessary to:
- Estimate the annual amount of existing waste management capacity available in the county
 - Estimate the annual capacity gap between future waste management requirements and existing waste management capacity during and at the end of the plan period
- 4.2.2 As part of the development of a new SWLP there is a need to identify existing waste management capacity in the county. A capacity methodology has been developed to support this.
- 4.2.3 The Capacity Estimate Scoping Statement sets out how existing capacity will be identified and the challenges and assumptions used to apply this methodology. The results of identifying existing capacity and any future capacity are key to guiding how much land and what type(s) of facilities are required.

² National Planning Policy for Waste (2014) Appendix B Locational Criteria

4.2.4 Based on our current information the WPA believe that a strategic facility, defined as;

- Capacity greater than 20,000 tpa, or
- Capacity which forms part of a strategic network of facilities.

Requires at least 0.3ha of land. Therefore, the proposed criteria would only be applied to that strategic areas greater than 0.3ha that we are considering as part of a new SWLP.

4.2.5 Smaller areas or those which can be co-located with other appropriate land uses e.g. sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages³ may well be supported by policies in the new SWLP but are considered too small to be considered for specific allocation as strategic land for waste development.

³ National Planning Policy for Waste (2014) paragraph 4

5 Approach to identification

- 5.1.1 In order to ensure that all alternatives were considered and that the selection of preferred areas is as comprehensive as possible, a wide range of potentially viable land will be identified. Including land identified in:
- The Surrey Annual Monitoring Report (AMR) 2014/15
 - The Site Assessment Reports for the SWP 2008
 - The Site Assessment Long List & Short List for the joint Aggregates Recycling Development Plan Document 2013
 - Sites allocated / identified in the adopted SWP 2008
 - Sites allocated / identified in the adopted joint Aggregates Recycling DPD 2013
- 5.1.2 Surrey County Council will also work with property teams and other planning teams at Surrey and the district and borough councils to identify if there is other land which could be suitable for waste development.
- 5.1.3 As part of the 'Issues and Options' consultation the council are also seeking nominations for any suitable land under a 'Search for Suitable Land'. This nominated land will be subject to the same assessment outlined in this methodology before being considered for inclusion in the new SWLP .

6 Assessment of Suitable Land Methodology

6.1 Baseline information gathering

6.1.1 Information regarding the environmental characterisations of each area of land will be collated using the list of sources identified in Appendix 1. This will be used to provide a short desktop study for each area of land ('baseline report'). The baseline report will then be used to screen the land against the selection criteria.

6.2 Selection criteria

6.2.1 The proposed selection criteria recognise that there is a need to conserve and enhance the environmental quality of Surrey and the role that the WPA can play in achieving this. The proposed selection criteria aim to balance environmental protection against the need for waste related development and the challenge in meeting Surrey's needs going forward.

6.2.2 A review of the national policy context, local policy considerations and other guidance will be used to inform key decision making criteria for use in the Assessment of Suitable Land.

6.2.3 The NPPW includes criteria⁴ for:

- protection of water resources,
- land instability,
- visual intrusion,
- nature conservation,
- historic environment and built heritage,
- traffic and access,
- air emissions including dust,
- odours,
- vermin and birds,
- noise and vibration,
- litter, and
- potential land use conflict.

6.2.4 The chosen Assessment of Suitable Land criteria (as set out in Appendix 2) fall under the two main categories:

- i) Preliminary Criteria
- ii) Secondary Criteria

⁴ National Planning Policy for Waste (NPPW) 2014 Appendix B

- 6.2.5 Assessment of Suitable Land work will be undertaken in two stages, the preliminary criteria will be used to complete an initial sieve of any potentially suitable land and the secondary criteria to complete a more detailed assessment.
- 6.2.6 The assessment criteria are not exhaustive. Rather, the identification of these criteria enables different parcels of land to be readily compared in order to identify land which is not deliverable or are overly constrained and those which could potentially offer opportunities for the development of capacity to meet the need for waste management facilities in Surrey.

6.3 Assessment methodology

- 6.3.1 Assessment of Suitable Land will be undertaken in two stages based on the environmental characterisation and any recent planning history.

Stage 1

- 6.3.2 The first stage is an initial sieving exercise based on the primary criteria which will exclude any land that is unlikely to be deliverable e.g. significant environmental constraints or already developed with an alternative use. Land excluded at this stage will not be taken any further.

Stage 2

- 6.3.3 The second stage involves a more detailed assessment using the secondary criteria and will evaluate on a case-by-case basis to determine whether the land could potentially be used for waste related development. Land identified at this stage will not automatically be included in the new SWLP .
- 6.3.4 The remaining land will then be subject to a detailed assessment and further investigation prior to their inclusion in the plan. Suitable land will be also considered against the capacity gap and a draft spatial strategy to ensure the council deliver the necessary facilities to manage an amount of waste that is equivalent to the quantity of waste arising in Surrey in the most sustainable way.
- 6.3.5 The land identified will be strategic areas which Surrey County Council consider necessary to manage an amount of waste equivalent to that generated in Surrey. The allocation of land in the new SWLP does not guarantee the grant of planning permission, but simply establishes the principle of waste development as being acceptable for that location.
- 6.3.6 Any land identified in the new SWLP will still require detailed assessment as part of the planning application process, which may include the need for formal assessment under the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

7 Next Steps

- 7.1.1 Following any consultation responses received during the 'Issues and Options' consultation Surrey County Council will refine the Assessment of Suitable Land methodology. Once the methodology is finalised the Assessment of Suitable Land process will commence.
- 7.1.2 Details of the final methodology and the assessments completed will be included as part of the evidence base for the new SWLP.
- 7.1.3 Surrey County Council will use the updated methodology to identify areas of land which are most suitable for inclusion as allocated sites in the new SWLP . These sites will be subject to public consultation and independent examination to ensure that they are acceptable. Surrey County Council will need to ensure that it is able to meet Surrey's future need for waste facilities.

Appendix 1 – Sources of Information

The following sources of information will be used in completing the environmental characterisations (Part 2) for land being considered as part of a new SWLP.

Part 2a: Natural Environment & Biodiversity

<http://maps.surreycc.gov.uk/masterplan/viewer.asp>

Under the 'Constraints' drop-down menu information on Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Local Nature Reserves (LNRs) and Sites of Nature Conservation Importance (SNCl). Under the 'Environment' drop-down menu is information on Ancient Woodland (the ancient woodland inventory will show the extent of ancient woodland)

Part 2b: Landscape & Visual Amenity

<http://maps.surreycc.gov.uk/masterplan/viewer.asp>

Under the 'Constraints' drop-down menu information on Areas of Outstanding Natural Beauty (AONBs) and the Area of Great Landscape Value (AGLV).

Under the 'Environment' drop-down menu is information on the 2015 Landscape Character Assessment for the county.

<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-south-east-england-and-london>

For information on National Character Areas.

Part 2c: Historic Environment & Archaeology

<http://maps.surreycc.gov.uk/masterplan/viewer.asp>

Under the 'Constraints' drop-down menu information on County Sites of Archaeological Importance (CSAIs), Areas of High Archaeological Potential (AHAPs), Registered Parks & Gardens, Listed Buildings and Conservation Areas.

<http://www.exploringsurreypast.org.uk/map/>

For information on Surrey Historic Environment Record.

<http://list.historicengland.org.uk/mapsearch.aspx>

For information on World Heritage Sites, Scheduled Monuments, Registered Parks & Gardens, and Listed Buildings. Note this information can also be obtained from <http://www.magic.gov.uk>.

Part 2d: Water Resources & Management

http://maps.environment-agency.gov.uk/wiyby/wiybyController?ep=maptopics&lang=_e

For information on fluvial and surface water flooding, flood risk from reservoirs, groundwater resources and flooding; and Source Protection Zones (SPZ).

<http://environment.data.gov.uk/catchment-planning/>

For information on surface watercourse and waterbody Water Framework Directive (WFD) status, groundwater body WFD status.

Part 2e: Land & Soil Resources

http://maps.environment-agency.gov.uk/wiyby/wiybyController?ep=maptopics&lang=_e

For information on areas of land previously affected by landfilling or land raising operations.

<http://www.magic.gov.uk/>

For information on Agricultural Land Classifications (ALC) classifications.

<http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

For information on the superficial deposits and bedrock geology of the site.

<http://mapapps2.bgs.ac.uk/ukso/home.html>

For information on soils.

Part 2f: Background Air Quality & Traffic

<http://www.dft.gov.uk/traffic-counts/cp.php>

For information on background traffic levels from automatic monitoring points on major roads.

Information on declared Air Quality Management Areas (AQMAs) should be sourced from the relevant borough or district council website.

Appendix 2 – Draft Site Selection Criteria

These criteria will be used to assess strategic sites/areas greater than 0.3 ha that could be suitable for waste development and will be considered for allocation in the new SWLP.

Criterion	Primary Criteria	Secondary Criteria	Related Policies or Guidance	Impact on Location
<i>a. protection of water quality and resources and flood risk management</i>				
Flood Risk	Landfill sites and waste management facilities for hazardous waste in flood zones 2 and 3 and will not be considered.		Planning Practice Guidance Applying the Sequential Test in the preparation of a Local Plan. Environment Agency (EA) Regulatory Guidance Note 3 'Groundwater Protection: Locational aspects of Landfills in Planning Consultation Responses and Permitting Decisions'.	Waste facilities in flood risk areas could potentially suffer from damage to infrastructure resulting in release of pollutants. Installations with hazardous substance consent are considered highly vulnerable and are not compatible with Flood Zone 3. The risk of leachate from landfill sites and ground contamination from other waste facilities requires careful consideration of the hydrogeology within and surrounding a site.
Surface Water Catchments	Not applied.	Sites/areas within catchments of surface watercourses classed as exhibiting 'poor' ecological status will be evaluated on a case by case basis.		
Groundwater Vulnerability	Sites within Source Protection Zone 1 (SPZ 1) designations will not be considered.	Sites/areas within SPZ 2, 3 & Special Interest designations will be evaluated on a case by case basis.		
<i>b. land instability</i>				
Land instability	Not applied.	Not applied.	Paragraphs 120 of the NPPF discourage development that would result in unacceptable risks from pollution and land instability.	Waste facilities located in areas with ground instability could potentially suffer from damage to buildings and structures.

Criterion	Primary Criteria	Secondary Criteria	Related Policies or Guidance	Impact on Location
<i>c. landscape and visual impacts</i>				
National Parks & Areas of Outstanding Natural Beauty (AONB)	Not applied.	Sites within National Park or AONB will be evaluated on a case by case basis.	Paragraphs 115-116 of the NPPF discourage major development that would adversely affect landscapes of national importance. Surrey Landscape Character Assessments.	<p>The significance of any landscape and visual impact is dependent on a number of site specific issues, including:</p> <ul style="list-style-type: none"> • Topography • Proximity to sensitive viewpoints • Existing Landscape Character • Presence/absence of screening • Site design • Building height <p>Not all of these factors will be known when assessing a site. However, sites will be subject to further scrutiny when planning permission is sought.</p>
Proposed extensions to the Surrey Hill Area of Outstanding Natural Beauty	Sites within areas of the Surrey AGLV proposed for inclusion within the Surrey Hills AONB will not be considered.	Sites located 'within the setting' of an AGLV area proposed for inclusion within the Surrey Hills AONB will be evaluated on a case by case basis.	Guildford Local Plan 2003: Policy RE6, Waverley Local Plan 2002: Policy C3 and Mole Valley Landscape SPD (July 2013) development in the AGLV should respect special qualities of the landscape.	
Area of Great Landscape Value (AGLV)	Not applied.	Sites within areas of the AGLV will be evaluated on a case by case basis.		
<i>d. nature conservation</i>				
European & International Nature Conservation Designations	Sites partly or wholly within international and European ecological designations, including Ramsar Sites, SPAs, and SACs will not be considered.	Sites being considered for thermal treatment located within 10 kilometres of any designated, or proposed, SPAs or SACs (& Ramsar Sites) will be evaluated on a case by case basis.	Paragraphs 118-119 of the NPPF discourage development that would adversely affect international and national biodiversity designations.	<p>Noise and vibrations released as a result of waste operations may have an impact on amenity or disturb nearby wildlife.</p> <p>Clearance and site operations sites may negatively impact habitats for some species.</p>

Criterion	Primary Criteria	Secondary Criteria	Related Policies or Guidance	Impact on Location
National & Statutory Nature Conservation Designations	Sites partly or wholly within statutory ecological designations defined under UK law, including SSSIs, NNRs and LNRS will not be considered.	Sites adjacent to statutory ecological designations defined under UK law, including SSSIs, NNRs and LNRS, or within the relevant SSSI impact zones, will be evaluated on a case by case basis.		Emissions may affect air quality which can negatively affect ecosystem health.
Protected Species	Not applied.	Sites that are known, or may, have established populations of European Protected Species present will be evaluated on a case by case basis.		
Local Non-Statutory Nature Conservation Designations	Not applied.	Sites that are partly or wholly within SNCIs or RIGS will be evaluated on a case by case basis.		
<i>e. conserving the historic environment</i>				
World Heritage Sites & Scheduled Monuments	Sites containing or within 250m of World Heritage Sites or Scheduled Monuments will not be considered.	Sites being considered for allocation and which are considered to effect the setting or asset for World Heritage Sites or Scheduled Monuments will be evaluated on a case by case basis.	Paragraph 132 in the NPPF states that substantial harm to or loss of designated heritage assets should be wholly exceptional. Historic England (March 2015) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning.	The infrastructure required for waste can potentially affect heritage sites, particularly through: <ul style="list-style-type: none"> • Impacting the setting or views • Dewatering or flooding of sites • Dust, noise and vibration damaging buildings or enjoyment of sites • Traffic can impact access
Grade I & Grade II* Listed Buildings Grade I & Grade II* Registered Parks & Gardens	Sites containing or within 250m of Grade I and II* Listed Buildings will not be considered.	Sites being considered for allocation and which located within a distance that it is considered will effect a Grade I and II* Listed Building will be evaluated on a case by case basis.	Vibrations can potentially pose a risk to the historic built environment and result in physical damage to heritage assets.	

Criterion	Primary Criteria	Secondary Criteria	Related Policies or Guidance	Impact on Location
Conservation Areas & Grade II Listed Buildings	Not applied.	Sites containing or within 250m of Grade II Listed Buildings or Conservation Areas will be evaluated on a case by case basis.		to sites for visitors
Grade II Registered Parks & Gardens	Not applied.	Sites containing or within 250m of Registered Parks & Gardens will be evaluated on a case by case basis.		
Archaeology	Sites containing or within 250m of a previously identified County Site of Archaeological Importance (CSAI) will be excluded	Sites being considered for allocation and which are located within or near to an area of high archaeological potential (AHAP) will be evaluated on a case by case basis.		The infrastructure required for waste can potentially threaten archaeological remains, particularly during the construction phase of the development.
<i>f. traffic and access</i>				
HGV Traffic	Not applied.	Sites that would generate a change in HGV flows of 25 AADT within or adjacent to an AQMA would be subject to detailed assessment prior to allocation.	Paragraphs 29 – 41 of the NPPF recognise the important role transport policies have in facilitating sustainable development and in contributing to wider sustainability and health objectives.	Heavy and large goods vehicles may potentially have adverse impacts on the road network, especially roads which may not be designed, or ideally suited to supporting heavy loads. Avoiding impacts on communities from heavy duty vehicles transporting waste to and from facilities (i.e. noise, nuisance, safety, congestion as opposed to air pollution) is considered a high priority.
Highways Capacity	Not applied.	Sites that would generate a 30% increase in total traffic on the adjoining highway network will be evaluated on a case by case basis. Roads will need to be suitable for HGVs.		
Sustainable Transport	Not applied.	Sites with potential for transport other than by road will be preferred.		

Criterion	Primary Criteria	Secondary Criteria	Related Policies or Guidance	Impact on Location
<i>g. air emissions, including dust</i>				
Air Quality Management Area (AQMA)	Not applied.	Sites located within, or adjacent, to designated AQMAs will be evaluated on a case by case basis.	Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002. Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) Planning For Air Quality (2015) states planning policies should sustain compliance with, and contribute towards, meeting EU limit values or national objectives for air pollutants.	Emissions from waste management facilities may contribute adversely to the air quality in an AQMA.
Dust	Not applied.	Not applied.	Paragraph 144 in the NPPF states that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source.	
<i>h. odours</i>				
Odour	Not applied.	Not applied.	IAQM Guidance on 'The assessment of Odour for Planning' highlights the need highlights to assess a range of odour contours and factors.	The release of bioaerosols from some waste management activities have potential to impact human health. Odours released from some waste activities may also affect the well being of communities.
<i>i. vermin and birds</i>				
Aerodrome	Not applied.	Not applied.		The potential attraction of waste

Criterion	Primary Criteria	Secondary Criteria	Related Policies or Guidance	Impact on Location
safeguarding areas				activities to birds and vermin may potentially create a bird aircraft strike hazard.
<i>j. noise, light and vibration</i>				
Noise & Vibration	Not applied.	Not applied.	Paragraph 144 in the NPPF states that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source.	Increased noise and vibration levels from transport movements and waste operations may have the potential to adversely affect local amenity.
Light	Not applied.	Not applied.	Paragraph 125 in the NPPF states that planning policies should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	Light levels from waste operations may have the potential to adversely affect local amenity.
<i>k. litter</i>				
Litter	Not applied.	Not applied.		Litter from waste operations may have the potential to adversely affect local amenity.
<i>l. potential land use conflict</i>				
Greenbelt	Not applied.	Sites outside of the Greenbelt will be preferred. Sites within greenbelt will be evaluated on a case by case basis.	NPPF construction of new buildings should be regarded as “inappropriate” for the green belt.	A large-scale building could potentially impact unacceptably on the openness of the Green Belt.

Criterion	Primary Criteria	Secondary Criteria	Related Policies or Guidance	Impact on Location
Greenfield sites	Sites within land of ALC Grades 1, 2 and 3a will not be considered.	Sites located on previously developed land will be preferred.	<p>Paragraph 111 of the NPPF planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed.</p> <p>Paragraph 112 of the NPPF LPAs should seek to use areas of poorer quality land.</p>	
Deliverability	Not applied.	<p>Opportunities for co-location with existing waste management facilities will be preferred.</p> <p>Sites allocated for another conflicting use in relevant District or Borough Local Plans or LDF Documents AND that are not appropriate for co-location will not be considered.</p> <p>Sites with the potential to connect to national grid and or heat/power users will be preferred.</p> <p>Sites with site owners unable or unwilling to make a site available for a suitable waste use during the plan period (2018 to 2033) will not be considered.</p>	Paragraph 4 of the NPPW states that WPAs should give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.	<p>Where sites are already being developed or have been identified for development for alternative uses e.g. residential there may be a conflict of use of the land.</p> <p>Opportunities for co-location of minerals and waste facilities should be considered favourably as these can result in a reduction in vehicle movements and environmental benefits.</p>