

Surrey Waste Local Plan

Statement of Common Ground between Surrey County Council and Natural England

August 2019

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1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly between Surrey County Council ('the Council') and Natural England, hereafter referred to as 'the parties'
- 1.2 This SoCG documents those matters agreed with regard to the emerging Surrey Waste Local Plan. More specifically it sets out the matters of agreement relating to:
 - a. The following allocated sites:
 - Oakleaf Farm, Stanwell Moor
 - Land to the north east of Slyfield Industrial Estate, Guildford
 - Lambs Brickworks, South Godstone
 - Land adjacent to Trumps Farm, Longcross
 - b. HRA conclusions concerning the use of thermal treatment to manage waste at certain sites (Industrial Land Areas of Search).
 - c. The need to specify which types of waste management facility could be accommodated at the allocated sites.
- 1.3 The SoCG is prepared to assist the Inspector during the independent examination of the Surrey Waste Local Plan and is principally intended to address the representations made by Natural England (dated 8 March 2019) following publication of the Surrey Waste Plan for representations in accordance with Regulation 19 of the Town and Country Planning (Local Plans) (England) Regulations 2012.
- 1.4 The SoCG includes an Appendix A which was completed in response to Natural England's comments on the draft SoCG. It is included as an appendix because the Council's response contains important background evidence which helps support the matters of agreement between the parties. Appendix A refers to the relevant paragraphs in this final SoCG.
- 1.5 Appendix B provides further supporting information regarding a range of waste management facilities, their potential impacts and the assessments and potential mitigation available at the planning application stage.
- 1.6 This statement is provided without prejudice to other matters or detail that the parties may wish to raise during the examination.

2. Background

- 2.1 The Council is preparing a revised Waste Local Plan (known as the 'Surrey Waste Local Plan' (SWLP)) which will supersede the existing Surrey Waste Plan, 2008.
- 2.2 There has been ongoing and constructive cooperation between the Council and Natural England throughout the Plan preparation. This has included working closely during the preparation of the Habitats Regulation Assessment related to the Surrey Waste Local Plan.
- 2.3 Both parties are committed to continuing to co-operate and work closely together. The Council's Duty to Cooperate documentation details how and when engagement with Natural England has occurred during the course of Plan preparation.

3. Matters of agreement relating to the Surrey Waste Local Plan

Oakleaf Farm, Stanwell Moor

- 3.1 Both parties agree that Part 2 of the SWLP correctly notes that the Oakleaf Farm site allocation may be suited to the development of a small, medium or large scale thermal treatment facility subject to it being demonstrated by a project level Appropriate Assessment that emissions of nutrient nitrogen from the proposed facility would contribute no more than 1% of the site relevant Critical Load for the most sensitive habitat of the Windsor Forest & Great Park Special Area of Conservation SAC, or that there would be no significant adverse impact on the ecological integrity of the SAC. In this regard, it is noted that the HRA states that a small scale thermal treatment facility (a capacity of less than 50,000 tpa) 'may be acceptable' but that the site is 'less suited' to the development of a large scale thermal treatment facility (a capacity greater than 50,000 tpa).
- 3.2 Both parties agree that other forms of waste management may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest [Surrey County Council Local Validation List](#).

Land to the north east of Slyfield Industrial Estate, Guildford

- 3.3 Both parties agree that Part 2 of the SWLP correctly notes that, based on the findings of the HRA, the Slyfield Industrial Estate site allocation is unlikely to be suited to the development of any scale of thermal treatment facility. This is due to emissions resulting in the potential deposition of nutrient nitrogen on the Thames Basin Heath Special Protection Area (SPA).

- 3.4 Both parties agree that other forms of waste management, including wastewater treatment, may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest Surrey County Council Local Validation List.

Lambs Brickworks, South Godstone

- 3.5 Both parties agree that Part 2 of the SWLP correctly notes that the Lambs Brickworks site allocation may be suited to the development of a small, medium or large scale thermal treatment facility subject to it being demonstrated by a project level Appropriate Assessment that emissions of nutrient nitrogen from the proposed facility would contribute no more than 1% of the site relevant Critical Load for the most sensitive habitat of the Mole Gap to Reigate Escarpment SAC or that there would be no significant adverse impact on the ecological integrity of the SAC. In this regard, it is noted that the HRA states that a small scale thermal treatment facility (a capacity of less than 50,000 tpa) 'may be acceptable' but that the site is 'less suited' to the development of a large scale thermal treatment facility (a capacity greater than 50,000 tpa).
- 3.6 Both parties agree that other forms of waste management may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest [Surrey County Council Local Validation List](#).

Land adjacent to Trumps Farm, Longcross

- 3.7 Both parties agree that a Materials Recovery Facility may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest Surrey County Council Local Validation List.
- 3.8 Both parties agree that proposals for development in this location must show how they will not deter use of the proposed Suitable Alternative Natural Greenspace established at Chertsey Common as part of the Thames Basin Heaths SPA mitigation package for the proposed Longcross Garden Village development. Reference to this matter is proposed as a minor modification to Part 2 of the SWLP by addition of the following text to the 'Key development issue' titled 'Biodiversity' on page 67:

"The proposed Suitable Alternative Greenspace (SANG) at Chertsey Common is located some 200 metres to the south east of the site. This is part of the Thames Basin Heaths SPA mitigation package for the proposed Longcross Village development."

HRA conclusions concerning the use of thermal treatment to manage waste at certain sites (Industrial Land Areas of Search).

3.9 Both parties note the HRA has identified that thermal treatment is unlikely to be a suitable technology for the management of waste at sites located within the following Industrial Areas of Search (ILAS)¹:

- ILAS 4.5 Slyfield Industrial Estate, Moorfield Road & Westfield Road, Guildford (HRA ref. ILAS05)
- ILAS 4.8 Land north & south of Lysons Avenue, Ash Vale (HRA ref. ILAS07)
- ILAS 4.16 York Town Industrial Estate, Camberley (HRA ref. ILAS17)
- ILAS 4.22 Monument Way East Industrial Estate, Woking (HRA ref. ILAS22)

3.10 Both parties note the HRA has identified that sites located within the following Industrial Areas of Search (ILAS) are less likely to be suited for thermal treatment for the management of waste:

- ILAS 4.1 Brooklands & Wintersells Rd Industrial Parks & Byfleet Industrial Est (HRA ref. ILAS01)
- ILAS 4.2 Molesey Industrial Estate (HRA ref. ILAS03)
- ILAS 4.3 Hersham Road North and Lyon Road/ North Weylands (HRA ref. ILAS02)
- ILAS 4.6 Woodbridge Meadows (HRA ref. ILAS06)
- ILAS 4.7 Land around Burnt Common Warehouse. (HRA ref. ILAS09)
- ILAS 4.9 Riverwey Industrial Estate, Astolat Business Park and Weyvern Park. (HRA ref. ILAS08)
- ILAS 4.10 Land near Dorking West Station, Curtis Road / Station Road, Dorking (HRA ref. ILAS10)
- ILAS 4.11 Holmethorpe Industrial Estate, Redhill (HRA ref. ILAS11)
- ILAS 4.12 Perrywood Business Park, Honeycrock Lane, Salfords (HRA ref. ILAS12)
- ILAS 4.13 Salfords Industrial Estate, Brighton Road / Bonehurst Road, Salfords (HRA ref. ILAS13)
- ILAS 4.14 Thorpe Industrial Estate (HRA ref. ILAS14)
- ILAS 4.15 Byfleet Road Employment Allocation (HRA ref. ILAS15)
- ILAS 4.17 Windmill Road (HRA ref. ILAS16)
- ILAS 4.19 Farnham Trading Estate (incl. land north of Water Lane), Farnham (HRA ref. ILAS21)
- ILAS 4.20 Land at Dunsfold Aerodrome, Stovolds Hill, Cranleigh (HRA ref. ILAS19)
- ILAS 4.21 Coxbridge Business Park, Alton Road, Farnham (HRA ref. ILAS20)

¹ The ILAS numbering is taken from Part 2 of the SWLP. In some cases this numbering is different from that in the HRA (and SEA) and hence the HRA reference is also stated in brackets after the site name.

3.11 Both parties note the HRA has identified that small scale thermal treatment may be a suitable technology for the management of waste at sites located within the following Industrial Areas of Search (ILAS), subject to it being demonstrated by a project level Appropriate Assessment that emissions of nutrient nitrogen would not impact on the related SACs as set out below:

- ILAS 4.4 Longmead Industrial Estate, Longmead Road, Epsom - Wimbledon SAC (HRA ref. ILAS04)
- ILAS 4.18 HOBBS Industrial Estate – Ashdown Forest SAC (HRA ref. ILAS18)

3.12 Both parties agree that minor modifications should be made to Part 2 of the SWLP to reflect this information.

The need to specify which types of waste management facility could be accommodated at the allocated sites or ILAS.

3.13 Both parties agree that Policy 14 of the SWLP and the latest Local Validation List provide adequate policy protection to particular features of nature conservation interest, including but not limited to Sites of Special Scientific Interest (SSSIs) and Ancient Woodland that might potentially be impacted by waste management development.

3.14 Both parties agree that an Additional Modification to the text of Part 2 of the SWLP will be proposed as follows (new paragraph 3.1.3 to be inserted as set out below):

3.1.2 A range of issues will also likely need to be addressed as part of any planning application for waste development either within an ILAS or on an allocated site. For further guidance see Policy 14 of The Plan and the Council's 'Local List for the Validation of County Development & County Matters Planning Applications: Annex 2 – Waste Related Development⁴'.

“3.1.3 Information relating to the environmental context and likely sensitivity of the sites and areas can be found in Appendix C (Allocated sites) and Appendix D (ILAS) To the Surrey Local Waste Plan Environmental and Sustainability Report. Applicants should review and update that information as part of any planning application.”

4. Continued working between Natural England and Surrey County Council

- 4.1. As required, Natural England and Surrey County Council both commit to continued dialogue prior to, during and after the independent examination of the Surrey Waste Local Plan.

5. Conclusion

5.1. The representations dated 8 March 2019 made by Natural England on the Surrey Waste Local Plan in accordance with Regulation 19 of the Town and Country Planning (Local Plans) (England) Regulations 2012 have been addressed through this Statement of Common Ground.

Signatories

A handwritten signature in black ink, appearing to read 'Simon Thompson'.

Simon Thompson, Senior Planning Adviser, Natural England

A handwritten signature in black ink, appearing to read 'D. Forbes'.

Dominic Forbes, Planning Group Manager, Surrey County Council

8 August 2019

A. Context & Purpose

1. The purpose of this report is to respond to the comments made by Natural England (NE) on the first draft of a statement of common ground (SoCG) with Surrey County Council (SCC) relating to the new Surrey Waste Local Plan (WLP). The responses set out below seek to address the outstanding issues raised by NE, signposting where relevant to parts of the Surrey WLP evidence base, to SCC’s published guidance for applicants for planning permission, and to pertinent extant planning permissions.

B. Oakleaf Farm, Horton Road, Stanwell Moor (Surrey WLP, Part 2, Section 5 ‘Allocated Sites’, sub-section 5.4, pp.62-63) (SoCG, paragraphs 3.1 to 3.2)

SoCG Paragraph	NE Comment
3.2 Both parties agree that other forms of waste management may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest Surrey County Council Local Validation List.	The SWLP needs to include further impact pathways resulting from activity offsite and in close proximity to the designated sites (South West London Waterbodies SPA and Staines Moor SSSI). Our key concerns are: - Construction and operation of waste facilities (noise, dust, pollution, illumination etc); - Hydrological impacts.

2. The potential impacts of disturbance arising from waste related development at the Oakleaf Farm site, including from the generation of noise or the introduction of additional light sources, on the South West London Waterbodies Special Protection Area (SPA) (and therefore on the Staines Moor Site of Special Scientific Interest (SSSI)) is considered in paragraphs 11.14 and 11.15 (p.126) of the Habitat Regulations Assessment (HRA) for the Surrey WLP (January 2019).

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11.14	Screening Evaluation: However, where waste facilities could be located in particularly close proximity to the habitats of potentially sensitive species the introduction of new sources of noise or light could give rise to disturbance.
11.15	One of the sites allocated under Policy 11a (Site 1 – Oakleaf Farm, Stanwell Moor) ... located within 1 kilometre of SSSIs that are constituent parts of the SPA (and Ramsar Site).
11.15.1	Site 1 (Oakleaf Farm, Stanwell Moor) is 0.02 kilometres to the north of the King George VI Reservoir component of the Staines Moor SSSI, which forms a constituent part of the SPA and Ramsar Site. Site 1 is separated from the SSSI by the embanked walls of the reservoir which rise to 17 metres above the original ground level. The reservoir is operated by Thames Water as a source of water for public supply. The reservoir is used as a roosting and loafing site by the over-wintering (October to March) populations of the SPA bird species. Site 1 is already occupied by a range of waste management operations, but the principal source of noise disturbance affecting the area in which the SPA component is located will be Heathrow Airport. Given the physical separation of Site 1 from the SPA component by the embankment walls of the reservoir, and taking account of background noise conditions, it is unlikely that waste related development of Site 1 would give rise to significant disturbance impacts on the SPA bird species within the King George VI Reservoir component of the SPA as a consequence of noise or light emissions.

3. The Oakleaf Farm site is a former mineral working and benefits from permanent planning permission for waste management uses (original consent granted in November 2009, ref. SP08/0992 most recently varied in 2018 under SP18/00282/SCC), subject to a number of conditions that control matters including noise, lighting, dust and drainage. The site is enclosed by bunds that rise to between 6 and 8 metres in height above ground level, which serve to protect the surrounding area from emissions of noise, light and dust. The bund also serves to isolate the site from the surrounding area in terms of hydrology. For any further development or redevelopment of the site noise and light emissions would be amongst the matters subject to detailed assessment at the planning application stage.
4. Guidance on the information that would need to be provided as part of any planning application, where a proposed site is situated within or in close proximity to a range of sensitive areas/features is set out in the CPAs published [validation checklist for waste development](#). For example, for the Oakleaf Farm site the fact that the land is located within the borough-wide Spelthorne Air Quality Management Area (AQMA) means that any application for substantial development of the site would need to be accompanied by an air quality assessment, and the fact that there are sensitive receptors (i.e. residential properties) within 350 metres of the site would mean that a construction dust assessment would be required (see section 2 'Air Quality' of the Waste Validation Checklist for further details). The proximity of the site to sensitive human and ecological receptors would also necessitate the submission of a noise assessment, and if external lighting were to be provided as part of the development a lighting assessment would be required (see section 10 'Amenity' of the Waste Validation Checklist for further details). If a proposed development involved the installation of impermeable hard surfacing the application would need to be supported by information relating to the management of surface water runoff (see section 8 'Water Environment' of the Waste Validation Checklist for further details).

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C. Land north east of Slyfield Industrial Estate, Moorfield Road, Guildford (Surrey WLP, Part 2, Section 5 ‘Allocated Sites’, sub-section 5.1, pp.56-57) (SoCG, paragraphs 3.3 to 3.4)

SoCG Paragraph	NE Comment
<p>3.4 Both parties agree that other forms of waste management, including wastewater treatment, may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest Surrey County Council Local Validation List.</p>	<p>The SWLP needs to include further impact pathways resulting from activity offsite and in close proximity to the designated sites (Thames Basin Heaths SPA).</p> <p>For example, our key concerns are:</p> <ul style="list-style-type: none"> - Construction and operation of waste facilities (noise, dust, pollution, illumination etc); - Damage to ancient woodland and root plates; - Hydrological impacts.

5. The allocated site proposed on the land north east of Slyfield Industrial Estate is separated from Whitmoor Common SSSI, which is the closest such designation and also a component part of the Thames Basin Heaths SPA, by a distance of some 1.1 kilometres, with the intervening land occupied by a combination of the Slyfield Industrial Estate, open land, highway links and the settlement of Jacobs Well. The proposed allocated site is not located in sufficiently close proximity to the Whitmoor Common SSSI and the Thames Basin Heaths SPA to be a viable source of significant dust, noise or light pollution impacts.
6. The proposed allocated site is located within the drainage catchment of the Wey (Shalford to River Thames confluence) surface waterbody. The majority of the Whitmoor Common SSSI (excepting Unit 11 (Britten Pond) and Unit 10 (adjacent to Britten Pond)) is located within the drainage catchment of the Hoe Stream (Pirbright to River Wey confluence at Woking) surface waterbody, which is upstream of the drainage catchment in which the proposed allocated site is situated. Unit 11 (Britten Pond) and Unit 10 (adjacent to Britten Pond) of the Whitmoor Common SSSI are situated within the same drainage catchment (Wey (Shalford to River Thames confluence)) as the proposed allocated site but are situated on land that sits at a higher elevation (>35m AOD) than the proposed allocated site (<30m AOD). The proposed allocated site is hydrologically separated from the Whitmoor Common SSSI and the Thames Basin Heaths SPA and development of the site would not be a viable source of significant hydrological impact on either the SSSI or the SPA.
7. There is one area of Ancient Woodland (Ancient Semi-Natural Woodland) located immediately to the south of the proposed allocated site, with a second area of Ancient Woodland (Ancient Semi-Natural Woodland) located some 140 metres to the east of the proposed allocated site on the eastern bank of the River Wey. Both areas of Ancient Woodland are situated within the Riverside Park Local Nature Reserve (LNR) and are covered by local level Site of Nature Conservation Importance designations. Neither is covered by a SSSI, SPA or Special Area of Conservation (SAC) designation. Both areas of Ancient Woodland are located within 500 metres of the proposed site allocation and therefore any planning application submitted in respect of waste related development of the site would need to be supported by an Ancient Woodland assessment (see section 4 ‘Landscape, Landscaping & Trees’ of the Waste Validation Checklist for further details). Reference to the two areas of Ancient Woodland does appear to have been omitted from the key development issues listed under the ‘biodiversity’ heading in section 5.1 of Part 2 of the Surrey WLP, and should be addressed through a minor modification to the Plan.

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D. Lambs Brickworks, Terra Cotta Road, Tilburstow Hill Road, South Godstone (Surrey WLP, Part 2, Section 5 ‘Allocated Sites’, sub-section 5.5, pp.64-65) (SoCG, paragraphs 3.5 to 3.6)

SoCG Paragraph	NE Comment
3.6 Both parties agree that other forms of waste management may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest Surrey County Council Local Validation List.	<p>The SWLP needs to include further impact pathways resulting from activity offsite and in close proximity to ancient woodland.</p> <p>For example, our key concerns are:</p> <ul style="list-style-type: none"> - Construction and operation of waste facilities (noise, dust, pollution, illumination etc); - Damage to ancient woodland and root plates;

8. The Lambs Brickworks site at South Godstone is a former mineral working (brick clay extraction) that is subject to an outstanding requirement for restoration by means of infilling with inert waste. The area of Ancient Woodland (Ancient Semi-Natural Woodland), Maple Wood, which adjoins the former mineral working to the west is partly dissected by a rail line, which then passes beneath the woodland in a tunnel. The Ancient Woodland is designated a Site of Nature Conservation Importance (SNCI) at the local level.
9. Emissions of dust can give rise to adverse impacts on vegetation (e.g. smothering, stomatal obstruction, etc.) where concentrations are sufficiently high for such effects to arise. Given that the proposed allocated site is located immediately to the west of an area of established industrial development beyond which are located residential properties, it is likely that any application seeking permission for waste related development would need to be accompanied by a dust assessment with appropriate management measures required if permission were granted (see section 2 ‘Air Quality’ of the Waste Validation Checklist for further details). Any measures deployed to protect nearby sensitive human receptors from the adverse impacts of dust would also serve to safeguard the nearby Ancient Woodland. The Ancient Woodland would not be subject to adverse impacts as a consequence of emissions of noise and dust, although the fauna present within the woodland could be affected. The impacts of noise and light on fauna could be appropriately controlled through the imposition of suitable conditions at the planning permission stage.
10. The potential for the Ancient Woodland habitat of Maple Wood SNCI to be adversely affected by emissions of nutrient nitrogen or acid arising from any waste related development or associated traffic is considered in Part C10.E of [Appendix C-10 to the Environmental & Sustainability Report](#) (ESR) for the Surrey WLP. The precautionary assessment set out in the ESR is that, without mitigation, waste related development of the site could give rise to adverse impacts of high significance on irreplaceable biodiversity assets or designated sites. The mitigation mechanism built into the Surrey WLP is Policy 14 (Development Management) which states that planning permission would only be granted where an applicant could demonstrate that their proposal would not give rise to significant adverse impacts on a range of ecological assets, including Ancient Woodland and SNCIs. The area of Ancient Woodland is located within 500 metres of the proposed site allocation and therefore any planning application submitted in respect of waste related development of the site would need to be supported by an Ancient Woodland assessment (see section 4 ‘Landscape, Landscaping & Trees’ of the Waste Validation Checklist for further details). The proximity of the area of Ancient Woodland to the allocated site is captured in the key

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development issues listed under the ‘biodiversity’ heading in section 5.5 of Part 2 of the Surrey WLP.

E. Land adjacent to Trumps Farm, Kitsmead Lane, Longcross (Surrey WLP, Part 2, Section 5 ‘Allocated Sites’, sub-section 5.6, pp.66-67) (SoCG, paragraphs 3.7 to 3.8)

SoCG Paragraph	NE Comment
3.7 Both parties agree that a Materials Recovery Facility may be suitable in this location subject to proposals addressing the policies of the SWLP and requirements of the latest Surrey County Council Local Validation List.	<p>The SWLP needs to include further impact pathways resulting from activity offsite and in close proximity to the designated sites (Thames Basin Heaths SPA and Windsor Forest & Great Park SAC).</p> <p>For example, our key concerns are:</p> <ul style="list-style-type: none"> - Construction and operation of waste facilities (noise, dust, pollution, illumination etc); - Damage to ancient woodland and root plates; - Visual intrusions to nearby SANG (site 6); and - Hydrological impacts.

11. The land adjacent to Trumps Farm at Longcross (which is an existing Surrey Waste Plan allocated site) is separated from Chobham Common SSSI, which is the closest such designation and also a component part of the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC, by a distance of 1.4 kilometres. The land between the allocated site and the SSSI/SAC/SPA is composed of a mixture of developed and undeveloped land, the majority of which was formerly used by the Defence Estates Research Agency (DERA) as a vehicle testing facility. The former DERA site has been identified for development in the emerging Runnymede Borough Council Local Plan as the location of a Garden Village, and would be developed to provide a mixture of residential properties, commercial and community space. The proposed allocated Surrey WLP site is not located in sufficiently close proximity to the Chobham Common SSSI, the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC to be a viable source of significant dust, noise or light pollution impacts.
12. There are two areas of Ancient woodland located within the proposed allocated site, which lie in the eastern part of the site. Neither is covered by a SSSI, SPA or SAC designation or by an SNCI designation. Both areas of Ancient Woodland are located within the proposed site allocation and therefore any planning application submitted in respect of waste related development of the site would need to be supported by an Ancient Woodland assessment (see section 4 ‘Landscape, Landscaping & Trees’ of the Waste Validation Checklist for further details). The presence of the areas of Ancient Woodland within the allocated site is captured in the key development issues listed under the ‘biodiversity’ heading in section 5.6 of Part 2 of the Surrey WLP.
13. The proposed Chertsey Common Suitable Alternative Natural Greenspace (SANG) (which is proposed for allocation as such under Policy SD10 (Longcross Garden Village) of the Runnymede 2030 Draft Local Plan) is situated some 170 metres to the south of the proposed Surrey WLP allocated site at Trumps Farm at the point of closest proximity between the two areas of land. The intervening land is occupied by the former Trumps Farm landfill site, which lies immediately to the south of the proposed allocated site, and by an established green waste composting facility (permission originally granted in 2008, RU08/0556) and an established anaerobic digestion facility and wood drying and pelleting facility (permission originally granted in 2011, RU10/0872). The north western part of the proposed Chertsey Common SANG, which adjoins the established green waste composting facility (RU08/0556)

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is composed of established woodland that screens views from the north into and out from the proposed SANG. Given the nature of the land uses and established land cover on the area of land that separates the proposed allocated Surrey WLP site from the proposed Chertsey Common SANG the risk of visual intrusion into the proposed SANG from the development and operation of a small to medium scale (c.50,000 to 120,000 tonne per annum) dry mixed recyclables facility on the allocated site would be minimal and significant adverse impacts on users of the proposed SANG would not be expected to arise.

14. The proposed allocated site is located within the drainage catchment of the Chertsey Bourne (Virginia Water to Chertsey) surface waterbody. The southern part of the Chertsey Common SSSI is located within the drainage catchment of the Hale/Mill Bourne (Bagshot to Addlestone Bourne confluence near Chobham) surface waterbody, which is independent of the drainage catchment in which the proposed allocated site is situated. The southern part of the Chobham Common SSSI is situated within the same drainage catchment (Chertsey Bourne (Virginia Water to Chertsey)) as the proposed allocated site but the SSSI is situated upstream within the catchment from the proposed allocated site. The proposed allocated site is hydrologically separated from the Chobham Common SSSI, the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC and development of the site would not be a viable source of significant hydrological impact on the SSSI, the SPA or the SAC.

SoCG Paragraph	NE Comment
<p>3.8 Both parties agree that proposals for development in this location must show how they will not deter use of the Suitable Alternative Natural Greenspace established at Chertsey Common as part of the Thames Basin Heaths SPA mitigation package for the proposed Longcross Garden Village development. Reference to this matter is proposed as a minor modification to Part 2 of the SWLP by addition of the following text to the 'Key development issue' titled 'Biodiversity' on page 67:</p> <p><i>"The Suitable Alternative Greenspace (SANG) at Chertsey Common is located at least 200 metres to the south east of the site. This is part of the Thames Basin Heaths SPA mitigation package for the proposed Longcross Village development. Proposals should have regard to the Natural England guidelines for this SANG.."</i></p>	<p>Please explain how proposals for development will not affect the SANG (more details needed) and include this in appropriate text/policy.</p>

15. It is not possible at the Plan stage to give precise details of the measures that would be incorporated into a development proposal for the allocated site to ensure that its presence would not deter users of the proposed Chertsey Common SANG, which would be part of a complex of publically accessible open spaces developed to mitigate the impact of the proposed Longcross Garden Village on the Thames Basin Heaths SPA. The only pathway by which waste related development of the proposed Surrey WLP allocated site could influence use of the Chertsey Common SANG would be as a consequence of changes in the type and volume of traffic travelling on Kitsmead Lane. In order to not deter use of the proposed Chertsey Common SANG by occupants of the proposed Garden Village a suitable road crossing point could be established on Kitsmead Lane to facilitate access from the Garden Village to the SANG via the existing public footpath 45.

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F. HRA conclusions in respect of the use of thermal treatment to manage waste at certain sites [ILAS] (SoCG, paragraphs 3.9 to 3.12)

SoCG Paragraph	NE Comment
3.12 Both parties agree that minor modifications should be made to Part 2 of the SWLP to include this information.	Yes, agreed – however, we would also like more information on other possible types of waste facility at each site and whether they would be appropriate given their proximity to designated sites and/or ancient woodland.

16. The Surrey WLP, with the exception of thermal treatment facilities, does not specify the types of waste management facility (see Appendix B) that could be accommodated on the identified ILAS. Specifying the types of waste management uses that could be brought forward on any given ILAS would limit the flexibility of the Surrey WLP, and therefore constrain its ability to facilitate waste related development of the types required to respond to the identified gaps in the county’s waste management capacity. The strategic environmental assessment (SEA) and sustainability appraisal (SA) for the Surrey WLP considered a range of different waste management uses for the identified ILAS, including large and small scale thermal treatment, composting (open windrow and in-vessel), anaerobic digestion, mechanical and biological treatment, and storage and transfer (see Part D1 of [Appendix D to the Environmental & Sustainability Report](#)). Due to the scale of the assessment task (which covered 54 prospective allocated sites and the 22 ILAS identified with reference to Policy 10) the approach adopted for the SEA/SA was precautionary, and therefore focused on the most potentially harmful type and scale of waste related development that could be accommodated on the site in question. The relationship of the identified ILAS to designated nature conservation sites and to Ancient Woodlands were factors taken into account in the definition of each ILAS’ sensitivity to change (see Table D.1-3 in Appendix D to the Environmental & Sustainability Report). In practice it is probable that the types of waste related development brought forward on any of the identified ILAS would be similar in type and scale to waste management facilities already situated on industrial estates across Surrey.
17. The ecological sensitivities identified as part of the SEA/SA process are reflected in the ‘Key environmental sensitivities’ listed for each ILAS in section 4 (pp.12-55) of Part 2 of the Surrey WLP. Policy 14 (Development Management) of the Surrey WLP provides the means of ensuring that detailed assessments of site specific proposals for waste related development are carried out at the planning application stage and that appropriate mitigation measures are secured (see Appendix B). Environmental Impact Assessment (EIA) will be required where proposed schemes are considered by the CPA to be likely to give rise to significant environmental effects. Where necessary Appropriate Assessment will also be required at the planning application stage where proposed scheme are likely to give rise to significant impacts on SPAs or SACs.

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G. The need to specify which types of waste management facility could be accommodated at the allocated sites or ILAS (SoCG, paragraphs 3.13 to 3.15)

Draft SoCG Paragraph	NE Comment
3.12 Both parties agree that, other than for thermal treatment, it is not necessary for the Plan to specify exactly which types of waste management development might be suitable at a specific allocated site or within an ILAS.	We agree that the types of waste facility at each site does not have to be decided now. However, please explain what facility could potentially go at each site and whether they would be appropriate given their proximity to designated sites and/or ancient woodland. For example, could a type of facility impact upon the hydrology of a nearby SAC or SSSI?

18. The Surrey WLP, with the exception of thermal treatment facilities and the site allocated under Policy 11b (Land adjacent to Trumps Farm, Longcross), does not specify the types of waste management facility that could be accommodated on the allocated sites. Specifying the types of waste management uses that could be brought forward on any given allocated site would limit the flexibility of the Surrey WLP, and therefore constrain its ability to facilitate waste related development of the types required to respond to the identified gaps in waste management capacity. With the exception of the Oakleaf Farm site in Stanwell Moor, which is already subject to waste related development, none of the proposed allocated sites are located within 1 kilometre of any national or European nature conservation designations. The SEA/SA for the Surrey WLP considered a range of different waste management uses, including large and small scale thermal treatment, composting (open windrow and in-vessel), anaerobic digestion, mechanical and biological treatment, and storage and transfer (see [Appendix C-1 to the Environmental & Sustainability Report](#)). Due to the scale of the assessment task (which covered 54 prospective allocated sites and the 22 ILAS identified with reference to Policy 10) the approach adopted for the SEA/SA was precautionary, and therefore focused on the most potentially harmful type and scale of waste related development that could be accommodated on the site in question. The relationship of the prospective allocated sites and identified ILAS to designated nature conservation sites and to Ancient Woodlands were factors taken into account in the definition of each prospective allocated sites' sensitivity to change (see Table C.1-4 in Appendix C to the Environmental & Sustainability Report).

19. The ecological sensitivities identified as part of the SEA/SA process are reflected in the 'Key development criteria' listed for each allocated site in section 5 of Part 2 of the Surrey WLP. Policy 14 (Development Management) of the Surrey WLP provides the means of ensuring that detailed assessments of site specific proposals for waste related development are carried out at the planning application stage and that appropriate mitigation measures are secured (see Appendix A). Environmental Impact Assessment (EIA) will be required where proposed schemes are considered by the CPA to be likely to give rise to significant environmental effects. Where necessary Appropriate Assessment will also be required at the planning application stage where proposed scheme are likely to give rise to significant impacts on SPAs or SACs.

H. Review of ILAS located within 1.0 km of European Sites or sites of national importance

20. Of the twenty-two ILAS identified in the Surrey WLP (Part 2, Section 4, pp.12-55) a total of ten (see bullet list below) are located within 1.0 kilometre of one or more sites of European or national importance for nature conservation. The responses set out below seek to address

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the outstanding issues raised by NE in respect of the development and operation of waste management facilities on existing industrial estates located in close proximity to European or national nature conservation sites. It should be noted that many of these industrial estates already host businesses that are actively involved in waste management operations, undertaking those activities under the terms of relevant Environmental Permits or registered waste exemptions. It should also be noted that the establishment of a waste related business on land located within an established industrial estate would not necessarily involve the construction of new premises, and any planning application made to the CPA could be concerned simply with a change of use of existing buildings and structures.

- Molesey Industrial Estate, Central Avenue, West Molesey (Surrey WLP Part 2, sub-section 4.2, pp.14-15 / HRA & SEA ILAS03) – with reference to the South West London Waterbodies SPA and Ramsar Site, and the Knight & Bessborough Reservoirs SSSI.
- Longmead Industrial Estate, Blenheim Road, Epsom (Surrey WLP Part 2, sub-section 4.4, pp.18-19 / HRA & SEA ILAS04) – with reference to the Stones Road Pond SSSI.
- Slyfield Industrial Estate, Moorfield Road, Guildford (Surrey WLP Part 2, sub-section 4.5, pp.20-21 / HRA & SEA ILAS05) – with reference to the Thames Basin Heaths SPA and the Whitmoor Common SSSI.
- North & South of Lysons Avenue, Lysons Avenue, Ash Vale (Surrey WLP Part 2, sub-section 4.8, pp.26-27 / HRA & SEA ILAS07) – with reference to the Thames Basin Heaths SPA, the Thursley, Ash, Pirbright & Chobham SAC, the Ash to Brookwood Heaths SSSI and the Basingstoke Canal SSSI.
- Riverwey Industrial Estate, Astolat Business Park & Weyvern Park, Old Portsmouth Road, Peasmarsh (Surrey WLP Part 2, sub-section 4.9, pp.28-29 / HRA & SEA ILAS08) – with reference to the Wey Valley Meadows SSSI.
- Land near Dorking West Station, Curtis Road/Station Road, Dorking (Surrey WLP Part 2, sub-section 4.10, pp.30-31 / HRA & SEA ILAS10) – with reference to the Hackhurst & White Downs SSSI and the Ranmore Common SSSI.
- Thorpe Industrial Estate, Ten Acre Lane, Thorpe (Surrey WLP Part 2, sub-section 4.14, pp.38-39 / HRA & SEA ILAS14) – with reference to the South West London Waterbodies SPA and Ramsar Site, the Thorpe Hay Meadow SSSI and the Thorpe Park No.1 Gravel Pit SSSI.
- York Town Industrial Estate, Doman Road, Camberley (Surrey WLP Part 2, sub-section 4.16, pp.42-43 / HRA & SEA ILAS17) – with reference to the Thames Basin Heaths SPA, the Castle Bottom to Yateley & Hawley Commons SSSI, and the Blackwater Valley SSSI.
- Hobbs Industrial Estate, Eastbourne Road, Felbridge (Surrey WLP Part 2, sub-section 4.18, pp.46-47 / HRA & SEA ILAS18) – with reference to the Hedgocourt SSSI.
- Monument Way East Industrial Estate, Monument Way East, Woking (Surrey WLP Part 2, sub-section 4.22, pp.54-55 / HRA & SEA ILAS22) – with reference to the Thames Basin Heaths SPA, the Horsell Common SSSI and the Basingstoke Canal SSSI.

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H-1 Molesey Industrial Estate, Central Avenue, West Molesey (Surrey WLP Part 2, subsection 4.2, pp.14-15 / HRA & SEA ILAS03)

21. The Molesey Industrial Estate is an existing area of industrial and commercial development situated within the settlement of West Molesey in the borough of Elmbridge in north west Surrey. The industrial estate is bounded to the north, south, west and east by residential development. A component part of the South West London Waterbodies SPA and Ramsar Site, the Knight & Bessborough Reservoirs SSSI, is located some 0.03 kilometres to the west of the north western corner of the industrial estate, from which the latter is separated by the B369 (Walton Road). The SSSI is formed of two adjacent public water supply reservoirs that are operated and managed by Thames Water. Construction of the reservoirs was completed in 1907, and they are formed of 11 metre high continuous earth-fill embankments with a clay core that is keyed into the underlying London Clay. The SSSI is designated for the use of the waterbodies by over-wintering waterfowl including the gadwall and shoveler, the two species for which the South West London Waterbodies SPA and Ramsar Site are designated. The SSSI was reported by Natural England as exhibiting 'favourable' condition at the last condition assessment in 2012 (source: <https://designatedsites.naturalengland.org.uk/>).
22. The potential impacts of disturbance arising from waste related development on land situated within the established industrial estate, including from the generation of noise or the introduction of additional light sources, on the South West London Waterbodies SPA and Ramsar Site (and therefore on the Knight & Bessborough Reservoirs SSSI) is considered in paragraphs 11.14 and 11.15 (pp.126-127) of the HRA for the Surrey WLP (January 2019). The HRA concluded that significant impacts were not likely to arise for the SPA and Ramsar Site as a consequence of emissions of noise or associated with the use of land within the established industrial estate for waste management purposes due to the physical attributes of the designated waterbody.
23. The presence and use of the established industrial estate has not, to date, and based on the reported condition of the SSSI, adversely affected the ecological integrity of the designated site. The SSSI is physically separated from the industrial estate by the embankment walls of the reservoir, which act as barriers to noise and light disturbance, and would mitigate against the deposition of any dust that might arise from temporary construction works. As an established industrial estate it is anticipated that any waste related development constructed or otherwise established on land within the estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology. As an established industrial estate it is likely that external lighting will be in use at many or all of the businesses located on the estate and that the area would be subject to some level of illumination during the hours of darkness. The urban setting of the industrial estate and the types of businesses currently accommodated on the land would likely make the site an unsuitable location for waste management operations that would give rise to substantial emissions of noise, dust or odour (e.g. CD&E recycling, green waste treatment), as such uses would not be compatible with established neighbouring land uses.
24. The relationship of the Molesey Industrial Estate to the Knight & Bessborough Reservoirs SSSI, the South West London Waterbodies SPA and the South West London Waterbodies Ramsar Site is identified in the list of key environmental sensitivities for the ILAS set out in

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sub-section 4.2 on page 15 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSI is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-2 Longmead Industrial Estate, Blenheim Road, Epsom (Surrey WLP Part 2, sub-section 4.4, pp.18-19 / HRA & SEA ILAS04)

25. The Longmead Industrial Estate is an existing area of industrial and commercial development, which hosts an established community recycling centre (CRC) and waste transfer station (WTS) operated by SUEZ Recycling & Recovery Surrey Ltd. The industrial estate is situated within the settlement of Epsom in the borough of Epsom & Ewell in north west Surrey. The industrial estate is bounded to the north and south by residential development, to the east by a rail line and associated embankment, and to the west by a residential care home and Blenheim High School. The Stones Road Pond SSSI, an important site for Great crested newts, is located some 0.08 kilometres to the south of the industrial estate, from which the latter is separated by the Epsom to London main rail line and an area of land identified in the OS maps for the area as allotments but which is not in active use and is therefore heavily vegetated. The railway embankment is lined by trees and shrubs to both sides of the track, which further screens the SSSI from activities on the Longmead industrial estate. To the immediate north of the SSSI is another area of industrial and commercial development (the Nonsuch industrial estate) and a site providing accommodation for the gypsy and traveller community (Conifer Park) which is managed by Surrey County Council, whilst to the south is residential development. The SSSI was reported by Natural England as exhibiting 'favourable' condition at the last condition assessment in 2008 (source: <https://designatedsites.naturalengland.org.uk/>).
26. The presence and use of the industrial estate has not, to date, and based on the reported condition of the SSSI, adversely affected the ecological integrity of the designated site. The SSSI is physically separated from the industrial estate by the rail line embankment and associated vegetation and the abandoned allotment gardens, which would act as barriers to noise and light disturbance, and would mitigate against the deposition of any dust that might arise from temporary construction works. As an established industrial estate it is anticipated that any waste related development constructed or otherwise established on land within the estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology. As an established industrial estate it is likely that external lighting will be in use at many or all of the businesses located on the estate and that the area would be subject to some level of illumination during the hours of darkness. The urban setting of the industrial estate and the types of businesses currently accommodated on the land would likely make the site an unsuitable location for waste management operations that would give rise to substantial emissions of noise, dust or odour (e.g. CD&E recycling, green waste treatment), as such uses would not be compatible with neighbouring uses.
27. The relationship of the Longmead Industrial Estate to the Stones Road Pond SSSI is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.4 on page 19 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSI is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-3 Slyfield Industrial Estate, Moorfield Road, Guildford (Surrey WLP Part 2, sub-section 4.5, pp.20-21 / HRA & SEA ILAS05)

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28. The Slyfield Industrial Estate is an existing area of industrial and commercial development, which hosts a number of established waste related developments (an established CRC and WTS operated by SUEZ Recycling & Recovery Surrey Ltd; the Chambers Waste Management plc materials recovery facility; the Guildford Metal Exchange facility) amongst other uses ranging from an abattoir and meat wholesale facility through to major car retailers. The industrial estate is situated in the north east quarter of the settlement of Guildford in the borough of Guildford in western Surrey. The industrial estate is bounded to the north, east and west by a mixture of woodland, scrub and grassland, land in agricultural use and the floodplain of the River Wey, and to the south by residential development. The Whitmoor Common SSSI, which is part of the Thames Basin Heaths SPA complex, is located some 0.8 kilometres to the north west of the industrial estate, from which the latter is separated by the A320 (Woking Road) the settlement of Jacobs Well and a combination of woodland and land in agricultural or equestrian use. Whitmoor Common is owned by Surrey County Council and is managed by the Surrey Wildlife Trust.
29. The following SSSI units are located within 1.0 kilometre of the industrial estate. Information about the characteristics and condition of those units has been obtained from <https://designatedsites.naturalengland.org.uk/>.
- Unit 7 (Whitmoor Common – Part 2) reported as exhibiting ‘favourable’ condition when last surveyed in 2019.
 - Unit 8 (Whitmoor Common – Part 3) reported as exhibiting ‘favourable’ condition when last surveyed in 2019.
 - Unit 9 (Whitmoor Common – Part 4) reported as exhibiting ‘unfavourable - recovering’ condition when last surveyed in 2008. The main reason given for the ‘unfavourable’ recovering’ condition was the presence of invasive scrub and bracken that required active management. The most recent condition survey report indicates that the required management was being undertaken at the point in time at which that report was written.
 - Unit 10 (heathland adjacent to Britten Pond) reported as exhibiting ‘favourable’ condition when last surveyed in 2015.
 - Unit 11 (Britten Pond) reported as exhibiting ‘unfavourable – no change’ condition when last surveyed in 2006). The main reason given for the ‘unfavourable – no change’ condition of Britten Pond was that of siltation of the waterbody, which had resulted in the loss of the aquatic plants of interest. Britten’s Pond is in active use as a fishery (accessible to members of the Guildford Angling Society) and a programme of regeneration work is being undertaken to address the poor condition of the waterbody.
30. Two units of the SSSI reported as exhibiting ‘unfavourable – recovering’ or ‘unfavourable – no change’ condition are located within 1.0 kilometre of the industrial estate. The reasons given for those conclusions of unfavourable condition (siltation for Britten’s Pond and scrub and bracken invasion for the heathland) are unconnected to the presence of the established industrial estate and the use of that land for industrial and commercial purposes. The SSSI is physically separated from the industrial estate by a distance of 0.8 kilometres, with the intervening land occupied by the A320 (Woking Road) and other local roads, residential and associated development, and a combination of land in agricultural or equestrian use and

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woodland. The industrial estate is too distant from the SSSI to be a source of significant noise and light disturbance, or of any dust that might arise during temporary construction works or from operational activities on waste sites. Any change of use on land within the established industrial estate from non-waste to waste related development would need to include noise and dust control measures to ensure that neighbouring businesses were not impacted.

31. As an established industrial estate it is anticipated that any waste related development constructed or otherwise established on land within the estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology. As an established industrial estate it is also likely that external lighting will be in use at many or all of the businesses located on the estate and that the area would be subject to some level of illumination during the hours of darkness. A change of use on land within the established industrial estate from non-waste to waste related development would be unlikely to substantially alter emissions of light from the wider site.
32. The relationship of the Slyfield Industrial Estate to the Whitmoor Common SSSI and the Thames Basin Heaths SPA is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.5 on page 21 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSI is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-4 North & South of Lysons Avenue, Lysons Avenue, Ash Vale (Surrey WLP Part 2, sub-section 4.8, pp.26-27 / HRA & SEA ILAS07)

33. The Lysons Avenue industrial estate is an existing area of industrial and commercial development, which hosts an established WTS operated by SUEZ Recycling & Recovery Surrey Ltd (sited on Station Road West). The industrial estate is situated within the settlement of Ash Vale in the borough of Guildford in western Surrey close to the border with Hampshire. The industrial estate is bounded to the north by a combination of amenity open space and highways infrastructure, to the east and south by residential development with rail lines and associated embankments beyond, and to the west by a rail line beyond which is the valley of the Blackwater river with the A331 beyond. The industrial estate is 0.2 kilometres to the west of the Basingstoke Canal SSSI and 0.4 kilometres to the west of the Ash to Brookwood Heaths SSSI, the Thames Basin Heaths SPA, and the Thursley, Ash, Pirbright & Chobham SAC.
34. The Basingstoke Canal SSSI, which is important for aquatic plants and invertebrates, is located some 0.2 kilometres to the east of the industrial estate, and is separated from the latter by residential development and the B3411 (Frimley Road). The closest unit of the SSSI to the industrial estate, unit 2 (canal section north of Ash Vale junction and south of Mytchett Lake) was reported by Natural England as exhibiting ‘unfavourable – no change’ condition when last assessed in 2009 (source: <https://designatedsites.naturalengland.org.uk/>). The reasons given in the most recent condition survey report for the poor condition of unit 2 of the SSSI are the absence of aquatic vegetation and the quality of the waterbody.
35. The industrial estate and the canal are situated within the same drainage catchment (Blackwater (Aldershot to Cover Brook confluence at Hawley)), with the canal situated on land that sits at a higher elevation (c.75m AOD) than the established industrial estate (c.65m-70m AOD). As an established industrial estate it is anticipated that any waste related

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development constructed or otherwise established on land within the Lysons Avenue estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on local hydrology. Given the physical relationship of the established industrial estate to the canal, and taking account of the likelihood of the estate being served by mains drainage, it is unlikely that the continued presence and future use of the industrial estate would impact adversely on the water quality of the canal. The industrial estate is too distant from the canal to be a source of significant noise and light disturbance, or of any dust that might arise from temporary construction works.

36. The Ash to Brookwood Heaths SSSI, which is important for its heathland and bog habitats, and for its breeding populations of Dartford warbler, nightjar and woodlark, is located some 0.4 kilometres to the east of the industrial estate, and is separated from the latter by residential development, the B3411 (Frimley Road) and a rail line. The closest component of the SSSI to the industrial estate is unit 20 (land including Ash Common Ranges) which was reported by Natural England as exhibiting ‘unfavourable – recovering’ condition when last assessed in 2009 (source: <https://designatedsites.naturalengland.org.uk/>). The most recent condition survey report does not give specific reasons for unit 20 being in less than ‘favourable’ condition, although reference is made to the potential for further improvement in the botanical diversity of the unit. It should be noted that the unit is owned by the Ministry of Defence (MoD) and hosts a number of ranges that are used for military firearms training, with access onto to the land subject to management by the MoD. The industrial estate is too distant from the SSSI to be a source of significant noise and light disturbance, or of any dust that might arise during temporary construction works or from operational activities on waste sites. Any change of use on land within the established industrial estate from non-waste to waste related development would need to include noise and dust control measures to ensure that neighbouring businesses were not impacted.

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37. As an established industrial estate it is anticipated that any waste related development constructed or otherwise established on land within the estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology. As an established industrial estate it is also likely that external lighting will be in use at many or all of the businesses located on the estate and that the area would be subject to some level of illumination during the hours of darkness. The urban setting of the industrial estate and the types of businesses currently accommodated on the land would likely make the site an unsuitable location for waste management operations that would give rise to substantial emissions of noise, dust or odour (e.g. CD&E recycling, green waste treatment), as such uses would not be compatible with neighbouring uses.

38. The relationship of the Lyson Avenue industrial estate to the Basingstoke Canal SSSI and to the Ash to Brookwood Heaths SSSI, the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.8 on page 27 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSI is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-5 Riverway Industrial Estate, Astolat Business Park & Weyvern Park, Old Portsmouth Road, Peasmarsh (Surrey WLP Part 2, sub-section 4.9, pp.28-29 / HRA & SEA ILAS08)

39. The complex composed of the Riverway Industrial Estate, the Astolat Business Park and Weyvern Park is an established area of industrial and commercial development, no waste operations are currently located on any of the three sites but a pre-mixed cement plant is situated on the Riverway Industrial Estate (present since the 1960's). The industrial and commercial complex is situated within the settlement of Peasmarsh in the borough of Guildford in western Surrey. The industrial estate is bounded to the north by residential development, to the east by the Wey Navigation, to the west by the A3100 (Old Portsmouth Road), and to the south by a mixture of residential properties, woodland and land in grazing or equestrian use. The Wey Valley Meadows SSSI, an important site for Great crested newts, is located some 0.01 kilometres to the east of the industrial and commercial development complex, from which the latter is separated by the Wey Navigation and its associated tow path (situated on the western bank of the navigation). Both sides of the Navigation are lined by trees and shrubs, which further screen the SSSI from activities on the industrial and commercial complex. The SSSI unit closest to the industrial and commercial complex, unit 8, was reported by Natural England as exhibiting 'unfavourable – recovering' condition at the time of the last condition survey in 2012 (source: <https://designatedsites.naturalengland.org.uk/>). The most recent condition survey report does not give specific reasons for unit 8 being in less than 'favourable' condition, and does not identify any issues of particular concern for that part of the SSSI.

40. The SSSI is physically separated from the industrial estate by the Wey Navigation and associated vegetation, which would act as barriers to noise and light disturbance, and would mitigate against the deposition of any dust that might arise from temporary construction works. As an established industrial and business use complex it is anticipated that any waste related development constructed or otherwise established on land within any of the three estates/parks would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology. As an established industrial and business use complex it is also likely that external lighting will be in use at many or all of the businesses located within the

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complex and that the area would be subject to some level of illumination during the hours of darkness. The setting of the complex, which is proximate to residential properties, and the types of businesses currently accommodated on the land would likely make the site an unsuitable location for waste management operations that would give rise to substantial emissions of noise, dust or odour (e.g. CD&E recycling, green waste treatment), as such uses would not be compatible with neighbouring uses.

41. The relationship of the complex composed of the Riverwey Industrial Estate, the Astolat Business Park and Weyvern Park to the Wey Valley Meadows SSSI is highlighted in the list of key environmental sensitivities for the ILAS set out in sub-section 4.9 on page 29 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSI is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-6 Land near Dorking West Station, Curtis Road/Station Road, Dorking (Surrey WLP Part 2, sub-section 4.10, pp.30-31 / HRA & SEA ILAS10

42. The Curtis Road/Station Road industrial estate is an existing area of industrial and commercial development. The industrial estate is situated within the settlement of Dorking in the district of Mole Valley in central Surrey. The industrial estate is bounded to the north by a rail line with a combination of further industrial land, allotments and a community orchard, agricultural land, an equestrian centre and a school beyond, to the west is agricultural land, to the east is a combination of business development and residential properties, and to the south a combination of agricultural land and residential properties. The Hackhurst & White Downs SSSI is located some 0.4 kilometres to the north west of the industrial estate, and the Ranmore Common SSSI is located some 1.0 kilometres to the north west.

43. The Hackhurst & White Downs SSSI is separated from the industrial estate by a rail line, allotment gardens and the Dorking community orchard, established woodland (used for BMX and mountain bike riding) and agricultural land. The closest part of the SSSI to the industrial estate, unit 7 was reported by Natural England as exhibiting 'favourable' condition at the time of the last condition survey in 2013 (source: <https://designatedsites.naturalengland.org.uk/>). The industrial estate is too distant from the SSSI to be a source of significant noise and light disturbance, or of any dust that might arise from temporary construction works or from operational activities. The setting of the industrial estate, which adjoins areas of residential and business development, and the types of businesses currently accommodated on the land would likely make the site an unsuitable location for waste management operations that would give rise to substantial emissions of noise, dust or odour (e.g. CD&E recycling, green waste treatment), as such uses would not be compatible with neighbouring uses.

44. The Ranmore Common SSSI is separated from the industrial estate by a rail line, allotment gardens and the Dorking community orchard, established woodland, agricultural land, and the Denbies vineyard. The closest part of the SSSI to the industrial estate, unit 7 was reported by Natural England as exhibiting 'unfavourable - recovering' condition at the time of the last condition survey in 2017, which the report indicates was due to inappropriate woodland management (source: <https://designatedsites.naturalengland.org.uk/>). The industrial estate is too distant from the SSSI to be a source of significant noise and light disturbance, or of any dust that might arise from temporary construction works or from operational activities. The setting of the industrial estate, which adjoins areas of residential and business development,

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and the types of businesses currently accommodated on the land would likely make the site an unsuitable location for waste management operations that would give rise to substantial emissions of noise, dust or odour (e.g. CD&E recycling, green waste treatment), as such uses would not be compatible with neighbouring uses.

45. The industrial estate and the Hackhurst & White Downs SSSI are situated within the same drainage catchment (Pipp Brook), with the SSSI situated on land that sits at a higher elevation (c.80m AOD) than the established industrial estate (c.60m AOD). The Ranmore Common SSSI is located in a different surface water drainage catchment and is situated at an elevation of c.175m AOD. As an established industrial estate it is anticipated that any waste related development constructed or otherwise established on land within the Curtis Road / Station Road estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on local hydrology. Given the physical relationship of the established industrial estate to the two SSSIs, and taking account of the likelihood of the estate being served by mains drainage, it is unlikely that the continued presence and future use of the industrial estate would impact adversely on the condition of the two SSSIs as a consequence of hydrological effects.
46. The relationship of the Curtis Road / Station Road industrial estate to the Hackhurst & White Downs SSSI and the Ranmore Common SSSI is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.10 on page 31 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSI is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-7 *Thorpe Industrial Estate, Ten Acre Lane, Thorpe (Surrey WLP Part 2, sub-section 4.14, pp.38-39 / HRA & SEA ILAS14)*

47. The Thorpe Industrial Estate is an existing area of industrial and commercial development situated to the north of Thorpe and the south of Thorpe Lea in the borough of Runnymede in north west Surrey. The industrial estate is bounded to the north, west and east by undeveloped land some of which is in agricultural use, and to the south by a combination of residential development and land in restoration or aftercare from past mineral working and waste deposit. The industrial estate is located some 0.4 kilometres to the south west of the Thorpe Hay Meadow SSSI, from which it is separated by an area of established scrub grassland and woodland. A component part of the South West London Waterbodies SPA and Ramsar Site, the Thorpe Park No.1 Gravel Pit SSSI, is located some 0.7 kilometres to the south of the industrial estate, from which the latter is separated by the closed Coldharbour Lane landfill and residential development.
48. The potential impacts of disturbance arising from waste related development on land situated within the established industrial estate, including from the generation of noise or the introduction of additional light sources, on the South West London Waterbodies SPA (and therefore on the Thorpe Park No.1 Gravel Pit SSSI) is considered in paragraphs 11.14 and 11.15 (pp.126-127) of the HRA for the Surrey WLP (January 2019). The HRA concluded that the SSSI was too distant from the established industrial estate, from which it is separated by a range of established land uses including a closed landfill site, to be a source of significant noise and light disturbance, or of any dust that might arise during temporary construction works or from operational activities on waste sites. Any change of use on land within the established industrial estate from non-waste to waste related development

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would need to include noise and dust control measures to ensure that neighbouring businesses were not impacted.

49. The Thorpe Hay Meadow SSSI, which is designated on the basis of its lowland neutral meadow grassland and its range of lime loving plants, was reported by Natural England as exhibiting ‘favourable’ condition during the last condition assessment in 2010 (source: <https://designatedsites.naturalengland.org.uk/>). The presence and use of the established industrial estate has not, to date, and based on the reported condition of the SSSI, adversely affected on the ecological integrity of the designated site. The established industrial estate and the SSSI are both located at a similar elevation (c.10m-15m AOD). The SSSI is physically separated from the industrial estate by an established area of woodland, grassland and scrub, which would act as barriers to noise and light disturbance, and would mitigate against the deposition of any dust that might arise from temporary construction works. As an established industrial and business use complex it is anticipated that any waste related development constructed or otherwise established on land within any of the estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology.
50. The relationship of the Thorpe Industrial Estate to the Thorpe Hay Meadow SSSI and the Thorpe Park No.1 Gravel Pit SSSI and the South West London Waterbodies SPA and Ramsar Site is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.14 on page 39 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSIs and the SPA and Ramsar Site is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-8 *York Town Industrial Estate (and Admiralty Way Industrial Estate), Doman Road, Camberley (Surrey WLP Part 2, sub-section 4.16, pp.42-43 / HRA & SEA ILAS17)*

51. The York Town Industrial Estate and the neighbouring Admiralty Way Industrial Estate are existing areas of industrial and commercial development. The industrial estates are situated within the settlement of Camberley in the borough of Surrey Heath in north west Surrey. The two industrial estates are bounded to the north by the A30 (London Road) and are separated from each other by the A331 (Blackwater Valley Road), with the York Town industrial estate situated to the east of the A331 and the Admiralty Way industrial estate to the west. To the south of the York Town industrial estate is a combination of the Camberley wastewater treatment works, an undeveloped area of woodland and wetland, a retail and business park, and residential development. To the east of the York Town industrial estate is bounded by residential development and commercial properties. The Admiralty Way industrial estate is bounded to the east by woodland habitat associated with the Blackwater river, and to the south by the Hawley Meadows SANG (managed by the Blackwater Valley Partnership), which forms part of the river’s floodplain.
52. The Blackwater Valley SSSI is located some 0.1 kilometres to the north west of the Admiralty Way industrial estate, from which it is separated by the interchange of the A30 (London Road), the A331 (Blackwater Valley Road) and the A321 (Marshall Road). The closest SSSI unit (unit 1 – Southern Fields) to the industrial estate was reported by Natural England as exhibiting ‘favourable’ condition at the time of the last condition survey in 2014 (source: <https://designatedsites.naturalengland.org.uk/>). The presence and use of the industrial estate has not, to date, and based on the reported condition of the SSSI, adversely affected the ecological integrity of the designated site. The SSSI is physically separated from the

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industrial estate by the junction of the A30, the A331 and the A321, which would be closer and more significant sources of noise and light disturbance or dust deposition than the more distant industrial estate. Any change of use on land within the established industrial estate from non-waste to waste related development would need to include noise and dust control measures to ensure that neighbouring businesses were not impacted.

53. The Castle Bottom to Yateley & Hawley Commons SSSI, which is important for its heathland habitats and for its breeding populations of Dartford warbler, nightjar and woodlark, is located some 0.6 kilometres to the west of the Admiralty Way industrial estate, and is separated from the latter by the Blackwater river and associated habitats, a rail line and the settlement of Blackwater which comprises mainly residential development. The closest SSSI unit (unit 14 – Hawley Common) to the industrial estate was reported by Natural England as exhibiting ‘unfavourable - recovering’ condition at the time of the last condition survey in 2013 (source: <https://designatedsites.naturalengland.org.uk/>). The condition survey report indicated that the main reasons for the less than favourable condition assessment were variability in the condition of the heathland habitat and Dartford warbler numbers being below the target for the SPA. It should be noted that the unit is owned by the MoD and hosts features and facilities that are used for military training purposes, with access onto to the land subject to management by the MoD. The industrial estate is too distant from the SSSI to be a source of significant noise and light disturbance, or of any dust that might arise during temporary construction works or from operational activities on waste sites. Any change of use on land within the established industrial estate from non-waste to waste related development would need to include noise and dust control measures to ensure that neighbouring businesses were not impacted.
54. As established industrial estates it is anticipated that any waste related development constructed or otherwise established on land within the estates would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology. The proximity of the Admiralty Way industrial estate to the Blackwater river would attract the scrutiny of the Environment Agency, who would likely require the establishment and maintenance of an 8 metre buffer zone between the development site and the watercourse.
55. The relationship of the York Town Industrial Estate to the Blackwater Valley SSSI and the Castle Bottom to Yateley & Hawley Commons SSSI and the Thames Basin Heaths SPA is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.16 on page 43 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSIs and the SPA is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-9 *Hobbs Industrial Estate, Eastbourne Road, Felbridge (Surrey WLP Part 2, sub-section 4.18, pp.46-47 / HRA & SEA ILAS18)*

56. The Hobbs Industrial Estate is an existing area of industrial and commercial development, which already hosts a specialist liquid waste recycling facility (operated by County Clean Environmental Services Ltd), and is situated in a rural location to the north of the settlement of Felbridge in the district of Tandridge in south east Surrey. The industrial estate is bounded to the north and west by a mixture of land in agricultural and other rural uses and woodland, to the east by the A22 (Eastbourne Road), woodland and residential and commercial properties, and to the south by woodland and land in a combination of horticultural and fisheries uses. The Hedgecourt SSSI, an important wetland site, is located some 0.3

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kilometres to the south of the industrial estate, from which the latter is separated by agricultural land, woodland and road links. The closest SSSI unit (unit 5 – Moat Wood) to the industrial estate was reported by Natural England as exhibiting ‘favourable’ condition at the time of the last condition survey in 2014 (source: <https://designatedsites.naturalengland.org.uk/>).

57. The presence and use of the industrial estate has not, to date, and based on the reported condition of the SSSI, adversely affected the ecological integrity of the designated site. The SSSI is physically separated from the industrial estate by the intervening horticultural and fisheries land uses. Any change of use on land within the established industrial estate from non-waste to waste related development would need to include noise and dust control measures to ensure that neighbouring businesses were not impacted. As an established industrial estate it is anticipated that any waste related development constructed or otherwise established on land within the estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on hydrology. The waste treatment facility already located on the industrial estate operates under the terms of an Environmental Permit (EB3101SL/V002).
58. The relationship of the Hobbs Industrial Estate to the Hedgecourt SSSI is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.18 on page 47 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSI is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

H-10 Monument Way East Industrial Estate, Monument Way East, Woking (Surrey WLP Part 2, sub-section 4.22, pp.54-55 / HRA & SEA ILAS22)

59. The Monument Way East Industrial Estate is an existing area of industrial and commercial development situated within the settlement of Woking in the borough of Woking in north west Surrey. The industrial estate is bounded to the north by the Basingstoke Canal with a combination of heathland and woodland, including a Grade II Listed burial ground for Muslim soldiers who served during the two World Wars, and residential and other development beyond. To the immediate east is residential development with further commercial and industrial premises beyond, to the south is a combination of industrial, commercial and residential development and a rail line, and to the west is a further mixture of residential and industrial or commercial development.
60. The Basingstoke Canal SSSI adjoins the industrial estate to the north. The adjoining unit (unit 2) of the Basingstoke Canal SSSI was reported by Natural England as exhibiting ‘unfavourable – no change’ condition during the most recent condition assessment in 2009 (source: <https://designatedsites.naturalengland.org.uk/>). The condition survey report for unit 2 of the SSSI indicates that limited aquatic plant diversity and less than optimal water quality were the main reasons for the less than favourable condition of the unit. The condition assessment does not identify adjoining industrial and commercial land uses as the cause of the less than favourable condition of the SSSI. As an established industrial estate it is anticipated that any waste related development constructed or otherwise established on land within the estate would be served by existing surface water and foul water drainage systems, and would be connected to mains water supply, excluding the possibility of any adverse impacts on the hydrology of the adjoining SSSI. The urban setting of the industrial estate and the types of businesses currently accommodated on the land would likely make

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the site an unsuitable location for waste management operations that would give rise to substantial emissions of noise, dust or odour (e.g. CD&E recycling, green waste treatment), as such uses would not be compatible with neighbouring uses.

61. The Horsell Common SSSI and the Thames Basin Heaths SPA is some 0.7 kilometres to the north of the industrial estate, from which it is separated by the Basingstoke Canal, intervening heathland and woodland and a number of roads. The closest unit (unit 4 – Horsell Common) of the Horsell Common SSSI to the industrial estate was reported by Natural England as exhibiting ‘unfavourable - recovering’ condition during the most recent condition assessment in 2012 (source: <https://designatedsites.naturalengland.org.uk/>). The condition survey report for unit 4 of the SSSI indicates that vegetation management and recreational pressure were the main reasons for the less than favourable condition of the unit. The industrial estate is too distant from the SSSI to be a source of significant noise and light disturbance, or of any dust that might arise during temporary construction works or from operational activities on waste sites. Any change of use on land within the established industrial estate from non-waste to waste related development would need to include noise and dust control measures to ensure that neighbouring businesses were not impacted.
62. The relationship of the Monument Way East Industrial Estate to the Basingstoke Canal SSSI and the Horsell Common SSSI and the Thames Basin Heaths SPA is identified in the list of key environmental sensitivities for the ILAS set out in sub-section 4.22 on page 55 of Part 2 of the Surrey WLP as a matter that needs to be addressed at the planning application stage. The relationship of the ILAS to the SSSIs and the SPA is also considered in the SEA/SA for the Surrey WLP (Appendix D to the ESR).

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Appendix B – Types of Waste Management Facilities & Key Impacts

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Construction, Demolition & Excavation (CDE&E) Waste Recycling			
<p>CD&E waste mostly comes in the form of bricks, concrete & soils. A number of processes can be used depending on the nature of material, desired recycled product type & quality.</p> <p>Screening – materials are separated into different sizes/grades & unwanted/contaminated materials (metals, plastics, paper) can be removed.</p> <p>Crushing – associated with hard inert materials. Once crushed material is then screened to produce secondary aggregates.</p> <p>Washing – used to remove fine cohesive materials. Material produced can be used for asphalt & concrete production.</p>	<p>The working area of a CD&E recycling site is generally around 1.0-1.5 hectares. This would include all site machinery, ancillary buildings and stock piles of aggregates. At former mineral workings CD&E recycling sites may be part of a much larger site area.</p> <p>In Surrey a large amount of CD&E recycling facilities are located on former minerals sites. Other suitable land uses include industrial areas, degraded land and rail depots.</p> <p>Facilities should be located at least 250m away from sensitive receptors. Facilities are not generally located this close due to noise issues.</p> <p>Sites generally have a throughput of between 50,000-150,000 tpa and HGV movements are relatively high. Permitted hours for site operations are usually 0800-1730 Monday to Friday</p>	<p>Noise: Noise management plans and noise monitoring can be secured by means of condition. Noise limits can be established for the construction, operational and, if relevant, the decommissioning and restoration phases, and for night-time and day-time operations and activities. Environmental Permits may also include noise control conditions. Construction Environmental Management Plans (CEMPs) can be used to control noise and other emissions or issues arising during construction.</p> <p>Traffic: Numbers of vehicle movements generated by a facility can be controlled by condition. Site accesses can be engineered to direct traffic away from sensitive receptors. Construction Traffic Management Plans (CTMP) can be used to manage construction phase traffic generation. Routing strategies and travel plans can be used to control traffic during the operational phase of the development.</p> <p>Dust: Dust management plans and dust monitoring can be secured by means of condition. Environmental Permits may also include dust control conditions. Construction Environmental Management Plans (CEMPs) can be used to control dust and other emissions or issues arising during construction.</p>	<p>Noise assessment is required where:</p> <ul style="list-style-type: none"> • sensitive land uses such as dwelling, school, or care- homes would be affected • mobile site plant, processing plant or machinery would be used • where engineering activities such as earth moving, bund creation or soil stripping would be carried out • where the development is likely to affect a designated (international, national or local) nature conservation or geological site • the site is within an Area of Outstanding Natural Beauty (AONB) or the Area of Great Landscape Value (AGLV). <p>A Transport Assessment is required where development would generate 30 or more two-way vehicle movements per hour; 100 plus two-way vehicle movements per day; or any development proposed in a location within or adjacent to an AQMA. Proposals impacting on the Strategic Road Network should be discussed with the Highways England.</p> <p>Where a TA is not required a Transport Statement will be.</p> <p>An assessment of construction dust is required where development is to be located within an AQMA, or is likely to generate dust and sensitive receptors are within 350m of the site or within 100m of the construction road route.</p> <p>An assessment of operational dust is required where dust is likely to be generated by the development.</p>

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Community Recycling Centre (CRC)			
Household waste including garden waste, oversized items, timber and electrical appliances. CRCs can be single or double levelled with either ramps up to skips or skips below a raised level. Waste is removed by HGVs to be processed elsewhere, with separate access and areas for the public and waste collection vehicles being preferable. CRCs are usually outdoors but some modern facilities are indoors.	0.5-1.0 hectare (can be larger with ancillary facilities like waste transfer stations and material recovery facilities).	<p>Traffic: Numbers of vehicle movements generated by a facility can be controlled by condition. Site accesses can be engineered to direct traffic away from sensitive receptors. Construction Traffic Management Plans (CTMP) can be used to manage construction phase traffic generation. Routing strategies and travel plans can be used to control traffic during the operational phase of the development.</p>	<p>A Transport Assessment is required where development would generate 30 or more two-way vehicle movements per hour; 100 plus two-way vehicle movements per day; or any development proposed in a location within or adjacent to an AQMA. Proposals impacting on the Strategic Road Network should be discussed with the Highways England.</p> <p>Where a TA is not required a Transport Statement will be.</p>
	<p>Suited to industrial land use but areas that are convenient for residents to travel to.</p> <p>Facilities should be located at least 250m away from sensitive receptors.</p> <p>Throughput of 5,000-20,000 tpa (not including transfer or recovery). At smaller facilities around 150 car movements with 4-6 HGV movements (busier at weekends). Operational 0800-1730 – All year round (except certain bank holidays)</p>	<p>Noise: Noise management plans and noise monitoring can be secured by means of condition. Noise limits can be established for the construction, operational and, if relevant, the decommissioning and restoration phases, and for night-time and day-time operations and activities. Environmental Permits may also include noise control conditions. Construction Environmental Management Plans (CEMPs) can be used to control noise and other emissions or issues arising during construction.</p>	<p>Assessment required where:</p> <ul style="list-style-type: none"> • sensitive land uses such as dwelling, school, or care- homes would be affected • mobile site plant, processing plant or machinery would be used • where engineering activities such as earth moving, bund creation or soil stripping would be carried out • where the development is likely to affect a designated (international, national or local) nature conservation or geological site • the site is within an AONB or the AGLV
		<p>Litter: Litter management plans can be required by condition, and litter can be kept on site by means of appropriate fencing.</p>	<p>There are no requirements for the assessment of litter at the planning application stage.</p>

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Waste Transfer Station (WTS)			
<p>A WTS receives all types of waste from producers including industry, commerce and the general public and is then taken for treatment or disposal. The aim is to reduce the cost and environmental impact of transport, by transferring waste from a large number of smaller vehicles to a small number of larger vehicles. A WTS for Local Authority Collected Waste (LACW) would normally consist of waste being delivered onto the floor of a building or into bays, inert waste may be dealt with outside. Waste will usually only stay at a WTS for a couple of hours. WTS are often co-located with CRCs and Material Recovery Facilities (MRFs). Many skip hire facilities come under this category as they receive waste before sorting and sending it for processing in larger quantities.</p>	<p>0.5-1.0 hectares.</p> <p>Suited to industrial land uses and land adjacent to existing waste facilities.</p> <p>Should be at least 250m away from sensitive receptors, however there are examples of sites being located closer than this.</p> <p>Throughput can vary significantly from 2,000-100,000 tpa (Currently there are WTS at both ends of the scale in Surrey)</p> <p>Vehicle movements are dependent on scale but generally large amount of HGV and other vehicle movements.</p> <p>Operating hours vary</p>	<p>Traffic: Numbers of vehicle movements generated by a facility can be controlled by condition. Site accesses can be engineered to direct traffic away from sensitive receptors. Construction Traffic Management Plans (CTMP) can be used to manage construction phase traffic generation. Routing strategies and travel plans can be used to control traffic during the operational phase of the development.</p>	<p>A Transport Assessment is required where development would generate 30 or more two-way vehicle movements per hour; 100 plus two-way vehicle movements per day; or any development proposed in a location within or adjacent to an AQMA. Proposals impacting on the Strategic Road Network should be discussed with the Highways England.</p> <p>Where a TA is not required a Transport Statement will be.</p>
		<p>Noise: Noise management plans and noise monitoring can be secured by means of condition. Noise limits can be established for the construction, operational and, if relevant, the decommissioning and restoration phases, and for night-time and day-time operations and activities. Environmental Permits may also include noise control conditions. Construction Environmental Management Plans (CEMPs) can be used to control noise and other emissions or issues arising during construction.</p>	<p>Noise assessment is required where:</p> <ul style="list-style-type: none"> • sensitive land uses such as dwelling, school, or care- homes would be affected • mobile site plant, processing plant or machinery would be used • where engineering activities such as earth moving, bund creation or soil stripping would be carried out • where the development is likely to affect a designated (international, national or local) nature conservation or geological site • the site is within an AONB or the AGLV
		<p>Visual Intrusion: Visual impacts can be addressed through site selection (i.e. situating facilities within established industrial areas), through design (i.e. scale, form and appearance of buildings), and through the use of hard and soft landscaping.</p>	<p>A landscape assessment is required for:</p> <ul style="list-style-type: none"> • Developments that require an EIA. • Developments within or visible from the High Weald AONB or Surrey Hills AONB • Developments outside the AONBs where landscape features, treescapes or historic landscapes could be affected. • Development which could have an effect on an existing landscape scheme

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Materials Recovery Facilities (MRFs)			
<p>Typically process materials such as paper, card, glass, plastics, aluminium and cans/foil.</p> <p>MRFs are designed to separate co-mingled recyclate into separate waste streams to be sent for reprocessing.</p> <p>Materials can be sorted in a number of ways involving hand picking, screening, sieving, magnetic separation and mechanical sorting. MRFs recover valuable materials to be recycled like metals, glass and plastics to be reprocessed with other material sent to EfW, AD or landfill.</p>	<p>1-2 hectares.</p> <p>Facilities are suited to industrial land.</p> <p>Facilities can be located up to 100 meters away from sensitive receptors.</p> <p>Through put can range from 20,000-150,000 tpa</p> <p>Around 50-80 HGV movements per day at larger facilities</p> <p>Waste reception & processing 8000-1730 Monday to Friday (can include night working)</p>	<p>Traffic: Numbers of vehicle movements generated by a facility can be controlled by condition. Site accesses can be engineered to direct traffic away from sensitive receptors. Construction Traffic Management Plans (CTMP) can be used to manage construction phase traffic generation. Routing strategies and travel plans can be used to control traffic during the operational phase of the development.</p>	<p>A Transport Assessment is required where development would generate 30 or more two-way vehicle movements per hour; 100 plus two-way vehicle movements per day; or any development proposed in a location within or adjacent to an AQMA. Proposals impacting on the Strategic Road Network should be discussed with the Highways England.</p> <p>Where a TA is not required a Transport Statement will be.</p>
		<p>Noise: Noise management plans and noise monitoring can be secured by means of condition. Noise limits can be established for the construction, operational and, if relevant, the decommissioning and restoration phases, and for night-time and day-time operations and activities. Environmental Permits may also include noise control conditions. Construction Environmental Management Plans (CEMPs) can be used to control noise and other emissions or issues arising during construction.</p>	<p>Noise assessment is required where:</p> <ul style="list-style-type: none"> • sensitive land uses such as dwelling, school, or care- homes would be affected • mobile site plant, processing plant or machinery would be used • where engineering activities such as earth moving, bund creation or soil stripping would be carried out • where the development is likely to affect a designated (international, national or local) nature conservation or geological site • the site is within an AONB or the AGLV.

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Energy from Waste (EfW)			
<p>Mixed waste from household, commercial, industrial and refuse derived fuel (RDF). EfW involves the burning of waste to produce energy in the form of electricity. Waste is burnt in the most efficient way possible and modern technology at facilities means that harmful emissions are reduced.</p> <p>Some EfW facilities capture heat as well as generate electricity, these are called combined heat and power facilities (CHP) the heat captured can be used for domestic or industrial heating in areas close to the facility.</p> <p>Energy can also be generated from waste by the process of gasification. This process is known as advanced thermal treatment (ATT). Gasification involves heating waste without it combusting to produces gas (syngas) which is used to generate electricity as well as solid and liquid residues. Gasification facilities have similar criteria to EfW facilities just with a different process.</p>	<p>Smaller EfW facilities can be 1.0-3.0 hectares in size, larger facilities can be 3.0-5.0 hectares. The site size includes all landscaping, parking and ancillary uses.</p> <p>Facilities are suited to land allocated for business and general industrial land. Industrial land in proximity to waste sources is preferable.</p> <p>Facilities should be located at least 250m away from sensitive receptors.</p> <p>Typically have a throughput of 60,000-250,000 tpa for most EfW facilities. Some new larger facilities have a throughput of around 500,000 tpa</p> <p>Around 150 lorry movements per day delivering and collecting material</p> <p>Permitted hours for receiving material 0800-1730 Monday to Friday. Waste processing within the facility can take place 24 hours per day.</p>	<p>Air emissions: Stack emissions will be subject to control under the Environmental Permit regime, which will require compliance with the Industrial Emissions Directive. Vehicle emissions can be controlled indirectly by the capping of vehicle movements by means of condition or legal agreement.</p>	<p>An air quality assessment is required where development is to be located within or adjacent to an Air Quality Management Area (AQMA) or where the development is likely to generate significant vehicle movements as defined by the most recent EPUK- IAQM guidance or revision or subsequent updates</p>
		<p>Traffic: Numbers of vehicle movements generated by a facility can be controlled by condition. Site accesses can be engineered to direct traffic away from sensitive receptors. Construction Traffic Management Plans (CTMP) can be used to manage construction phase traffic generation. Routing strategies and travel plans can be used to control traffic during the operational phase of the development.</p>	<p>A Transport Assessment is required where development would generate 30 or more two-way vehicle movements per hour; 100 plus two-way vehicle movements per day; or any development proposed in a location within or adjacent to an AQMA. Proposals impacting on the Strategic Road Network should be discussed with the Highways England.</p> <p>Where a TA is not required a Transport Statement will be.</p>
		<p>Noise: Noise management plans and noise monitoring can be secured by means of condition. Noise limits can be established for the construction, operational and, if relevant, the decommissioning and restoration phases, and for night-time and day-time operations and activities. Environmental Permits may also include noise control conditions. Construction Environmental Management Plans (CEMPs) can be used to control noise and other emissions or issues arising during construction.</p>	<p>Noise assessment is required where:</p> <ul style="list-style-type: none"> • sensitive land uses such as dwelling, school, or care- homes would be affected • mobile site plant, processing plant or machinery would be used • where engineering activities such as earth moving, bund creation or soil stripping would be carried out • where the development is likely to affect a designated (international, national or local) nature conservation or geological site • the site is within the Surrey Hills AONB and Area of Great Landscape Value

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Energy from Waste (EfW) - continued			
<p>Mixed waste from household, commercial, industrial and RDF. EfW involves the burning of waste to produce energy in the form of electricity. Waste is burnt in the most efficient way possible and modern technology at facilities means that harmful emissions are reduced.</p> <p>Some EfW facilities capture heat as well as generate electricity, these are called CHP facilities the heat captured can be used for domestic or industrial heating in areas close to the facility.</p> <p>Energy can also be generated from waste by the process of gasification. This process is known as ATT. Gasification involves heating waste without it combusting to produce gas (syngas) which is used to generate electricity as well as solid and liquid residues. Gasification facilities have similar criteria to EfW facilities just with a different process.</p>	<p>Smaller EfW facilities can be 1.0-3.0 hectares in size, larger facilities can be 3.0-5.0 hectares. The site size includes all landscaping, parking and ancillary uses.</p> <p>Facilities are suited to land allocated for business and general industrial land. Industrial land in proximity to waste sources is preferable.</p> <p>Facilities should be located at least 250m away from sensitive receptors.</p> <p>Typically have a throughput of 60,000-250,000 tpa for most EfW facilities. Some new larger facilities have a throughput of around 500,000 tpa</p> <p>Around 150 lorry movements per day delivering and collecting material</p> <p>Permitted hours for receiving material 0800-1730 Monday to Friday. Waste processing within the facility can take place 24 hours per day.</p>	<p>Visual intrusion: Visual impacts can be addressed through site selection (i.e. siting facilities within established industrial areas), through design (i.e. scale, form and appearance of buildings), and through the use of hard and soft landscaping.</p>	<p>A landscape assessment is required for:</p> <ul style="list-style-type: none"> • Developments that require an EIA. • Developments within or visible from the High Weald AONB or Surrey Hills AONB • Developments outside the AONBs where landscape features, treescapes or historic landscapes could be affected. • Development which could have an effect on an existing landscape scheme
		<p>Dust: Dust management plans and dust monitoring can be secured by means of condition. Environmental Permits may also include dust control conditions. Construction Environmental Management Plans (CEMPs) can be used to control dust and other emissions or issues arising during construction.</p>	<p>An assessment of construction dust is required where development is to be located within an AQMA, or is likely to generate dust and sensitive receptors are within 350m of the site or within 100m of the construction road route.</p> <p>An assessment of operational dust is required where dust is likely to be generated by the development.</p>
		<p>Odour: Odour management plans and odour monitoring can be secured by means of condition. Environmental Permits may also include odour control conditions.</p>	<p>An odour assessment is required for proposals involving putrescible waste and composting within 250m of sensitive receptors e.g. housing, schools, retirement facilities etc. Where the proposal is likely to impact upon sensitive receptors by way of odour.</p>

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Metal Recycling & End of Life Vehicles (ELV)			
<p>End of Life Vehicles (ELVs) and Metals.</p> <p>Metal waste is sorted and stored ready for reprocessing.</p> <p>ELVs can be stored and then crushed ready for reprocessing.</p>	<p>Smaller sites for metals may be under a hectare (scrap yards) larger sites can be 2+ hectares depending on storage space required.</p> <p>Facilities are suited to industrial land use. Traditional scrap yards can accommodate facilities.</p> <p>Facilities can be located up to 100m away from sensitive receptors.</p> <p>Throughput in the region of 2,000-20,000 tpa depending on size and nature of facility</p> <p>HGV movements are relatively low due to the small scale of sites</p> <p>Reception and processes of waste generally from 0800-1730 Monday to Friday</p>	<p>Noise: Noise management plans and noise monitoring can be secured by means of condition. Noise limits can be established for the construction, operational and, if relevant, the decommissioning and restoration phases, and for night-time and day-time operations and activities. Environmental Permits may also include noise control conditions. Construction Environmental Management Plans (CEMPs) can be used to control noise and other emissions or issues arising during construction.</p> <p>Visual intrusion: Visual impacts can be addressed through site selection (i.e. situating facilities within established industrial areas), through design (i.e. scale, form and appearance of buildings), and through the use of hard and soft landscaping.</p>	<p>Noise assessment is required where:</p> <ul style="list-style-type: none"> • sensitive land uses such as dwelling, school, or care- homes would be affected • mobile site plant, processing plant or machinery would be used • where engineering activities such as earth moving, bund creation or soil stripping would be carried out • where the development is likely to affect a designated (international, national or local) nature conservation or geological site • the site is within an AONB or the AGLV <p>A landscape assessment is required for:</p> <ul style="list-style-type: none"> • Developments that require an EIA. • Developments within or visible from the High Weald AONB or Surrey Hills AONB • Developments outside the AONBs where landscape features, treescapes or historic landscapes could be affected. • Development which could have an effect on an existing landscape scheme

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Composting			
<p>Organic waste, green waste (grass cuttings, leaves and pruning), cardboard, certain food waste and biodegradable industrial waste.</p> <p>In-vessel composting can process kitchen and catering waste but must comply with regulation.</p> <p>Windrow – Waste is shredded, mixed and placed in long mounds known as windrows. Windrows are typically 1.5m-3.0m tall, oxygen supply and temperature is controlled by frequent turning and moisture controlled by frequent watering. After 10-12 weeks the process is complete. Windrows can be located indoors or outside.</p> <p>In-vessel – Shredded waste is fed into vessels along a series of trays. Temperature, oxygen and moisture are controlled and after around 1 week the material is removed and placed in windrows for 2-3 weeks.</p>	<p>Windrow – Around 1.0 hectare. Open windrows can blend in with rural development with their low profile and require an open setting. In door windrows are suited to rural industrial settings. Average throughput of 5,000-15,000 tpa and require a relatively low number of HGV movements. Waste received 0800-1730 Monday to Friday, composting process is constant.</p> <p>In-vessel – 1.0-1.5 hectares. Facilities are suited to industrial areas, these are usually close to the source of waste. Throughput of 20,000 to 50,000 tpa requires more HGV movements than windrow facilities. Operating hours are similar to windrow.</p> <p>Facilities should be located at least 250m away from sensitive receptors</p>	<p>Bioaerosol emissions: Bioaerosol emissions will be subject to control under the Environmental Permit regime.</p> <p>Odour: Odour management plans and odour monitoring can be secured by means of condition. Environmental Permits may also include odour control conditions.</p> <p>Traffic: Numbers of vehicle movements generated by a facility can be controlled by condition. Site accesses can be engineered to direct traffic away from sensitive receptors. Construction Traffic Management Plans (CTMP) can be used to manage construction phase traffic generation. Routing strategies and travel plans can be used to control traffic during the operational phase of the development.</p> <p>Dust: Dust management plans and dust monitoring can be secured by means of condition. Environmental Permits may also include dust control conditions. Construction Environmental Management Plans (CEMPs) can be used to control dust and other emissions or issues arising during construction.</p> <p>Visual Intrusion: Visual impacts can be addressed through site selection (i.e. situating facilities within established industrial areas), through design (i.e. scale, form and appearance of buildings), and through the use of hard and soft landscaping.</p>	<p>Required for the operational phase of any development where all of the following apply: the proposal involves the management of putrescible waste; has the potential to suspend biologically- active particles in the air and there are sensitive receptors to within 250m from the site boundaries.</p> <p>An odour assessment is required for proposals involving putrescible waste and composting within 250m of sensitive receptors e.g. housing, schools, retirement facilities etc. Where the proposal is likely to impact upon sensitive receptors by way of odour.</p> <p>A Transport Assessment is required where development would generate 30 or more two-way vehicle movements per hour; 100 plus two-way vehicle movements per day; or any development proposed in a location within or adjacent to an AQMA. Proposals impacting on the Strategic Road Network should be discussed with the Highways England.</p> <p>Where a TA is not required a Transport Statement will be.</p> <p>An assessment of construction dust is required where development is to be located within an AQMA, or is likely to generate dust and sensitive receptors are within 350m of the site or within 100m of the construction road route.</p> <p>An assessment of operational dust is required where dust is likely to be generated by the development.</p> <p>A landscape assessment is required for:</p> <ul style="list-style-type: none"> • Developments that require an EIA. • Developments within or visible from the High Weald AONB or Surrey Hills AONB • Developments outside the AONBs where landscape features, treescapes or historic landscapes could be affected. • Development which could have an effect on an existing landscape scheme

Appendix B Types of Waste Management Facilities & Key Impacts

(Source: *Types of Waste Management Facilities: An Explanation Note*, Surrey County Council, October 2017)

Materials & Process	Key Characteristics	Key Environmental Issues	
		Mitigation & Control	Planning Application Stage Assessment <i>(source: SCC Local List)</i>
Other Recovery (including Anaerobic Digestion (AD))			
<p>Organic waste (industrial food waste, household food waste). Sewage sludge treated at sludge treatment facilities.</p> <p>AD is the biological treatment of organic waste in the absence of oxygen. The process takes place in a digester which is a large, warm, sealed, airless container. AD most commonly produces Biogas, it also produces fibre and liquor that can be used as fertilisers.</p> <p>AD is one of a number of processes that takes place when treating sewage sludge.</p>	<p>1.0-1.5 hectares.</p> <p>Small scale AD facilities can blend in with rural development due to their low profile.</p> <p>Larger facilities are suited to more intensive industrial areas, facilities can also be extensions to existing waste facilities.</p> <p>Facilities should be located at least 250m away from sensitive receptors.</p> <p>Average throughput of 20,000-50,000 tpa but can be much lower at smaller facilities. Sludge treatment facilities can vary. The sludge treatment facility currently operating in Surrey can handle up to 60,000 tpa. Relatively high number of HGV movements, depends on throughput of site. Waste reception 0800-1730 Monday to Friday.</p>	<p>Traffic: Numbers of vehicle movements generated by a facility can be controlled by condition. Site accesses can be engineered to direct traffic away from sensitive receptors. Construction Traffic Management Plans (CTMP) can be used to manage construction phase traffic generation. Routing strategies and travel plans can be used to control traffic during the operational phase of the development.</p>	<p>A Transport Assessment is required where development would generate 30 or more two-way vehicle movements per hour; 100 plus two-way vehicle movements per day; or any development proposed in a location within or adjacent to an AQMA. Proposals impacting on the Strategic Road Network should be discussed with the Highways England.</p> <p>Where a TA is not required a Transport Statement will be.</p>
		<p>Noise: Noise management plans and noise monitoring can be secured by means of condition. Noise limits can be established for the construction, operational and, if relevant, the decommissioning and restoration phases, and for night-time and day-time operations and activities. Environmental Permits may also include noise control conditions. Construction Environmental Management Plans (CEMPs) can be used to control noise and other emissions or issues arising during construction.</p>	<p>Noise assessment is required where:</p> <ul style="list-style-type: none"> • sensitive land uses such as dwelling, school, or care- homes would be affected • mobile site plant, processing plant or machinery would be used • where engineering activities such as earth moving, bund creation or soil stripping would be carried out • where the development is likely to affect a designated (international, national or local) nature conservation or geological site • the site is within the Surrey Hills AONB and Area of Great Landscape Value
		<p>Visual intrusion: Visual impacts can be addressed through site selection (i.e. siting facilities within established industrial areas), through design (i.e. scale, form and appearance of buildings), and through the use of hard and soft landscaping.</p>	<p>A landscape assessment is required for:</p> <ul style="list-style-type: none"> • Developments that require an EIA. • Developments within or visible from the High Weald AONB or Surrey Hills AONB • Developments outside the AONBs where landscape features, treescapes or historic landscapes could be affected. • Development which could have an effect on an existing landscape scheme