Surrey Waste Local Plan
Examination

Matters Statement: Matter 8 Community engagement, delivery, monitoring and review (Policy 16)

23 August 2019
Issue: Whether the provisions for community engagement, delivery and monitoring are effective and adequately identify triggers for review?

138. Is Policy 16 sufficiently clear and robust? To be positively prepared, effective and justified in relation to the Council’s validation requirements, should the policy require pre-application submission community engagement for development proposals that are likely to have substantial community interest? Is substantial defined? Is clear guidance provided within the SWLP of the ‘suitable proportionate steps’ expected?

Council’s Response:

138.1 Policy 16 is sufficiently clear and robust. The supporting text notes that Surrey County Council’s revised validation checklist includes a requirement for developers to provide a statement showing how engagement has been undertaken in accordance with the Council’s Statement of Community Involvement. The absence of such a statement will provide a good indication of whether engagement has been undertaken in accordance with Policy 16. Furthermore, when such statements are submitted, their content will provide evidence as to whether the requirements of Policy 16 have been met.

138.2 The extent and type of community engagement that could amount to ‘suitable proportionate steps’ will depend on the type and location of the development and relevant planning history and level of previous engagement and community interest. Hence this is best determined by the applicant with appropriate advice from the case officer in accordance with Policy 16 (and having regard to the supporting text) and in the context of the Council’s Statement of Community Involvement (SWLP 23) and Validation Checklist.
139. For effectiveness, should Policy 16 refer to the support for the establishment of liaison groups, to address issues that may arise from the operation on larger waste management developments?

Council’s Response:

139.1 Liaison groups are specifically encouraged in the *Statement of Community Involvement (ref. SWLP23)*. Hence, developers will be encouraged to use existing liaison groups and to describe how local views have informed the planning application in the statement submitted with the planning application as required by the Validation Checklist. In some instances a new liaison group may be desirable but this will be relatively rare and paragraph 5.6.2.4 of the supporting text provides sufficient support for their establishment where issues arising from the operation of larger waste developments suggest they are desirable.

140. Does the SWLP demonstrate a commitment to on-going collaborative and joint working, which will actively support the implementation of its policies and proposals and the delivery of its objectives? How will the co-ordination of strategic capacity provision be achieved? (SWLP, paragraph 3.7.1.3)

Council’s Response:

Does the SWLP demonstrate a commitment to on-going collaborative and joint working, which will actively support the implementation of its policies and proposals and the delivery of its objectives?

140.1 The commitment to on-going and collaborative and joint working is set out in the *Statements of Common Ground (SOCG-01 - 09)*, which have been prepared to support the preparation of the SWLP, as well as the *SEWPAG Memorandum of Understanding (SWPS-02)* and *Joint Position Statements* which relate specifically to the achievement strategic capacity provision. Paragraph 3.8.2.1 lists the majority of these documents (which are included in the examination library) but further documents have been prepared as follows:

- *Statement of Common Ground with Surrey Districts and Boroughs (SOCG-01)*
- *Statement of Common Ground with North London Boroughs (SOCG-02)*
- *Statement of Common Ground with Kent County Council (SOCG-03)*
- Statement of Common Ground with East Sussex County Council and South Downs National Park Authority (SOCG_04)
- Statement of Common Ground with West Sussex County Council and South Downs National Park Authority (SOCG-05)
- Statement of Common Ground with Hampshire County Council (SOCG-06)
- Statement of Common Ground with Buckinghamshire County Council (SOCG-07)
- Statement of Common Ground with Suffolk County Council (SOCG-08)
- Statement of Common Ground with Natural England (SOCG-09)

How will the co-ordination of the strategic capacity provision be achieved?

140.2 The terms of reference for the South East Waste Planning Advisory Group (SWPS-14) confirms that the group exists to help co-ordinate strategic capacity provision. The terms of reference state that the overall aim of SEWPAG is to: “..ensure that meaningful, collaborative joint working between WPAs, the Environment Agency and the waste industry (represented by the ESA) within the South East of England on strategic waste management issues is undertaken diligently and on an ongoing basis for the mutual benefit of those authorities.”

141. Does the SWLP include policies that would steer the timing of land releases? Should the SWLP include an indicative delivery trajectory, with identified timescales for facilities to be provided? How will the development of facilities of types that sit towards the top of the waste hierarchy be prioritised? (SWLP, paragraph 3.7.1.2)

Council’s Response:

Does the SWLP include policies that would steer the timing of land releases? Should the SWLP include an indicative delivery trajectory, with identified timescales for facilities to be provided?

141.1 All proposals for waste facilities will be assessed against the requirement for the waste management capacity provided for by that waste management facility in accordance with Policy 1. An indicative delivery trajectory is provided in Section 1 of the SWLP which sets out a clear indication of how the capacity of different types of waste management is required at certain times during the plan period. In this way the SWLP indicates when land can be expected to be developed.
141.2 The majority of the allocated sites are within the Green Belt and therefore provide a ‘safety net’ in terms of capacity provision. This means that the release of such land for development is effectively a ‘last resort’ mechanism for delivering the required waste management capacity and so cannot be monitored in the manner proposed by the question.

How will the development of facilities of types that sit towards the top of the waste hierarchy be prioritised? (SWLP, paragraph 3.7.1.2)

141.3 Policy 1 will ensure that development of facilities towards the top of the waste hierarchy is prioritised. This policy will ensure that appropriate capacity is developed for the management of wastes which lend themselves to management at certain levels of the waste hierarchy. For example, facilities for the management of dry mixed recyclables will only be acceptable if the management facilitates the recycling of that waste stream. Policy 1 also places a maximum limit on the development of other recovery capacity to ensure that management of waste by this method is not unduly incentivised.

142. Is monitoring proposed to take place in line with the requirements identified in the PPG? (PPG ID: 28-054-20141016) Are the indicators and targets for each policy sufficiently precise and consistent with these requirements?

Council’s Response:

142.1 Yes. Each policy in the SWLP contains a monitoring table which contains a measure/indicator, data source, key organisations that will be involved, targets and a trigger for review. These have been developed in line with PPG ID: 28-054-20141016.
What measures are in place to ensure that the SWLP can respond flexibly to changing circumstances that might arise through emerging plans being prepared elsewhere, particularly on issues with cross-boundary impacts? Are suitable arrangements in place for reviews of the SWLP at appropriate times? Are the potential triggers for such reviews clearly identified?

**Council’s Response:**

143.1 Under *Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)* local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

143.2 The AMR will monitor the effectiveness of the Plan and ensure that latest data to allow assessment of any waste management capacity gaps is available so that the need for facilities can be considered when applications are assessed.

143.3 The Council will continue to work closely with Surrey districts and boroughs and waste planning authorities in the south east through existing officer level groups (SPOA, PWG and SEWPAG). Through these groups existing SOCG will be regularly reviewed and updated as necessary (as stated in the SOCGs). This ongoing cooperation will also help inform the need for revisions to the SWLP.

143.4 Furthermore, the Council will continue to monitor the preparation of local plans within the County and beyond and make representations on these Plans as appropriate. Such representations will be made taking into account the potential for emerging plans to impact on the successful implementation of the SWLP.

143.5 The response to Q144 below explains how the SWLP is flexible and is therefore able to respond to changing circumstances.
144. Does the Plan provide flexibility? What contingency arrangements and alternative strategies have been considered if development identified in the Plan does not proceed, or the rate of development anticipated is not met, including in relation to the provision of infrastructure?

**Council’s Response:**

144.1 Yes, the Plan does provide flexibility. The SWLP identifies a need for an additional approximate 150,000 tpa. The Plan makes provision for this to be met in three ways (See SWLP 12):

1. Safeguarding existing capacity
2. Appropriate extensions and enhancements to existing facilities.
3. The development of new facilities in suitable locations.

144.2 In total the allocated sites amount to approximately 19 hectares. In order to meet the need for additional capacity it is estimated that the amount of land needed is approximately 6 hectares. (SWLP para 4.3.2.4)

144.3 Given that additional capacity is likely to come forward from the extension and enhancement of existing facilities and other suitable sites including ILAS (See SWLP 11) this quantum of allocated land provides significant flexibility.

144.4 The Plan does not anticipate a rate of development. It provides for development, but delivery will be largely down to waste industry responses to market requirements. Indeed, given the sub-regional nature of much of the waste management market it could be that capacity to meet some of Surrey’s waste management requirement is met elsewhere (See SocG with Kent CC SOCG-03 para 4.6).

145. Is there a need to identify a reserve of potential future development sites, should the proposed allocated sites in the Plan not come forward for development as anticipated?

**Council’s Response:**

145.1 No. Five of the allocated sites amount to an area of approximately 19 hectares. This excludes land north east of Slyfield Industrial Estate which is largely required to accommodate the relocation of existing facilities but which, nevertheless, has the
potential to provide additional capacity. The amount of land needed is estimated at approximately 6 hectares. (SWLP para 4.3.2.4)

145.2 A comprehensive site search has been undertaken (SWLP 9) comprising a long list of some 208 sites. It is concluded that in order to provide a level of certainty and flexibility within the Plan as set out in the NPPF 2019 (Paragraph 11 a)) and the national Planning Practice Guidance (What flexibility should waste planning authorities plan for when allocating sites? Paragraph 038 Reference ID: 28-038-20141016) some Green Belt land is required to be allocated.

145.3 Five of the allocated sites are currently in the Green Belt (one of these is proposed to be removed from the Green Belt through the Local Plan process). Any ‘reserve’ sites are likely to require greenfield land in the Green Belt to be allocated. Three such greenfield sites were initially considered for inclusion in the Plan at the draft stage but have not been carried forward due to insufficient justification (SWLP para 5.3.3.6). These sites are:

- Land to the west of Earlswood Sewage Treatment Works, Redhill
- Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey
- Land at Martyrs Lane, Woking

145.4 If unallocated sites become available and are proposed for waste management, planning applications will be determined according to the policies in the Plan.