

Surrey County Council Minerals and Waste Planning Policy

Surrey Waste Local Plan

Consultation Statement

Regulation 22

April 2019

If you have any questions about the consultation or you are having difficulty in accessing the documents please contact Surrey County Council:



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1 Introduction

1.1 Preparing a new Surrey Waste Local Plan

1.1.1 Waste management infrastructure is essential to support a modern economy. It is crucial that we plan for waste related development to ensure there are sufficient facilities to manage waste sustainably.

1.1.2 Waste local plans set out the planning framework for the development of waste management facilities and are used in determining planning applications for waste facilities. The current Surrey Waste Plan (SWP) was adopted in 2008. Since it was adopted in 2008 a number of new challenges have arisen, including:

- Changes in the policy landscape and approaches to plan-making.
- Evolution of waste management technologies and approaches.
- Current and emerging local conditions including pressure to release allocated waste sites to alternative development.
- Changes in patterns of waste production.

1.1.3 It is essential that the waste local plan is kept up to date to provide a robust policy framework to support the sustainable management of waste. The new Surrey Waste Local Plan (SWLP) will cover the period from 2018 to 2033 and will help to ensure that Surrey is able to provide sufficient waste management capacity and ensure waste is managed in the most sustainable way.

Figure 1 Key stages in delivering the Surrey Waste Local plan



1.2 Purpose of the Consultation Statement

- 1.2.1 In accordance with Regulation 22 of the Town and Country Planning (Local Planning) Regulations 2012, this consultation statement sets out the bodies and persons that the local planning authority invited to make representations on the content of the SWLP at key points in its development under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 (see below). It provides a summary of the main issues raised during these consultations and how these representations were taken into account.
- 1.2.2 This document also details the number of representations received at the Regulation 19 (in accordance with Regulation 20) stage provides a summary of the main issues raised. A separate document has been prepared¹ that sets out the issues raised at this stage in more detail and provides the Council's response.
- 1.2.3 This document also sets out how the Council engaged stakeholders in the preparation of the Plan in accordance with the council's adopted Statement of Community Involvement (SCI).
- 1.2.4 The Issues and Options Consultation Summary of Responses Report (2017) and the Draft Plan Consultation Summary Report (2018) were produced following these consultations. These reports also detail how different bodies and persons were invited to make representations for these consultations and set out the issues raised in the representations in greater detail.

2 Legal Context

- 2.1.1 Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that:

18.—(1) A local planning authority must—

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

¹ Period for Representations (Regulation 19) Report.

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

2.1.2 Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, provides a definition of 'general' and 'specific' consultation bodies.

2.1.3 Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires:

22. (c) a statement setting out-

(i) which bodies and persons the local planning authority invited to make representations under regulation 18.

(ii) how these bodies and persons were invited to make representation under regulation 18.

(iii) a summary of the main issues raised by the representations under regulation 18.

(iv) how any representations made pursuant to regulation 18 have been taken into account;

(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and

(vi) if no representations were made in regulation 20, that no such representations were made.

2.1.4 This Consultation Statement, taken together with the Issues and Options Consultation Summary of Responses Report (2017), the Draft Plan Consultation Summary Report (2018) and the Duty to Cooperate Statement seeks to meet the requirements of Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report identifies specific and general consultation bodies in **Section 6**.

3 Minerals and Waste Development Scheme

3.1.1 The Local Planning Authority is required to produce a Local Development Scheme (LDS) under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). As the Minerals and Waste Planning Authority for the county of Surrey, Surrey County Council is required to produce a Minerals and Waste Development Scheme (MWDS).

3.1.2 The MWDS provides information relating to the adopted minerals and waste local plans, but also notably set out the planned timetable for reviewing each development plan document and the key milestones in the process.

- 3.1.3 A review of the adopted Surrey Waste Plan began in September 2016, and the timetable for this review is detailed in the MWDS adopted in 2014. Since that time changes to the timetable have taken place. The council published a revised 'Draft MWDS' in October 2017 and adopted an amended version in December 2018.
- 3.1.4 The change between the adopted MWDS (2014) and the adopted MWDS (2018) reflects an extended Regulation 18 period that was required to ensure that the Draft SWLP produced was based on up to date evidence and assessments and to ensure that all the matters that arose from the Issues and Options consultation were fully considered.
- 3.1.5 The adopted MWDS (2018) sets out a later date for commencement of the Regulation 19 publication period (than that set out in the 2017 Draft MWDS). This reflects the need for additional time to consolidate the evidence base for the proposed site allocations, and to complete assessment work and incorporate the results into the plan. Further to this the waste needs assessment was refreshed to include the latest data for 2017.
- 3.1.6 Timetables from each MWDS are included in **Appendix 3** of this report.

4 Stakeholder meetings

- 4.1.1 During the development of the Surrey Waste Local Plan, meetings took place with individual stakeholders on request, and when specific information or input was needed. These meetings played a role in shaping the contents of the SWLP. Individual stakeholders included waste companies, land owners, and operators.
- 4.1.2 **Appendix 5** contains a record of key meetings that took place.
- 4.1.3 A record of meetings and key correspondence with all Duty to Cooperate bodies, including district and borough councils and other Minerals and Waste Planning Authorities, can be found in the Duty to Cooperate Evidence of Engagement Statement.

5 Consultations

5.1 Overview

- 5.1.1 The development of the SWLP involved two main consultation stages held under Regulation 18 of the Town and Country Planning Act, which helped to shape and influence the contents of the plan.
- 5.1.2 The submission version of the SWLP was then published in accordance with Regulation 19 of the Town and Country Planning Regulations (Local Planning (England) 2012 to allow representations to be made prior to submission of the plan to the Secretary of State.

5.1.3 The dates of these stages are set out in Table 1 below.

Table 1 – Consultations that took place as part of the production of the SWLP

Regulation 18	
Issues and Options Consultation	September to November 2016
Draft Plan Consultation	1 November 2017 to 7 February 2018
Regulation 19	
Submission Plan - Period for Representations	14 January 2019 to 10 March 2019

5.2 Issues and Options Consultation (Reg 18)

5.2.1 Between 2 September and 25 November 2016 Surrey County Council consulted on ‘Issues and Options’ documents as part of the preparation of the new Surrey Waste Local Plan.

5.2.2 The documents that were consulted on at the issues and options stage were:

- Issues and Options Consultation Report
- Background Policy Paper No 1: Context and Issues
- Background Policy Paper No 2: Capacity Estimate Scoping Statement
- Background Policy Paper No 3: Assessment of Suitable Land Scoping Statement
- Background Policy Paper No 4: Duty to Cooperate Scoping Statement
- Strategic Environmental Assessment & Sustainability Appraisal: Scoping Report

5.2.3 The ‘Issues and Options’ consultation sought views on the strategic context, the vision and the objectives for sustainable waste management in Surrey. A ‘Search for suitable land’ (otherwise known as a ‘call for sites’) was also undertaken, where consultees were encouraged to nominate land that might be considered suitable for waste related development.

5.3 Draft Plan Consultation (Reg 18)

5.3.1 Between 1 November 2017 and 7 February 2018 Surrey County Council consulted on a ‘Draft Surrey Waste Local Plan’ in accordance with Regulation 18 of the Town and County Planning Act (2012).

5.3.2 The consultation sought views on the vision and objectives, spatial strategy, policies, sites and site identification process, environmental and sustainability report and on the

WPA's updated statement regarding compliance with the Duty to Cooperate. The Draft SWLP was comprised of the following main documents:

- Surrey Waste Local Plan: Draft Plan
- Draft Waste Local Plan Annexe 1 - Shortlisted Sites
- Draft Plan Non-Technical Summary
- Environmental and Sustainability Report (Preliminary Draft)

5.3.3 The main documents were supported by a number of background documents which were also made available on the council's website. These included:

- Types of Waste Management Facilities - Non Technical Explanation
- Background Policy Paper No 5: Waste Needs Assessment
- Background Policy Paper No 6: Site Identification and Evaluation Report
- Background Policy Paper No 7: Delivery of Waste Management Capacity in Surrey 2008 - 2017
- Background Policy Paper No 8: Duty to Cooperate Evidence of Engagement
- Preferred Options - Vision and Objectives
- Preferred Options - Spatial Strategy
- Preferred Options – Policies
- Issues and Options Summary of Responses Report

5.3.4 A second 'Search for suitable land' was carried out during the same period as the Draft SWLP consultation, which gave landowners and operators a further opportunity to propose land, that might be suitable for waste management, for allocation in the SWLP.

5.4 Submission Plan: Period for Representations (Reg 19)

5.4.1 Between 14 January 2019 and 10 March 2019 Surrey County Council published a Submission Surrey Waste Local Plan. In accordance with Regulation 19 of the Town and Country Planning Regulations 2012, this was done to gather representations on the version of the Plan that the Council intended to submit to the Secretary of State for independent examination.

5.4.2 The plan was published to gather representations on the Plan that focused on its soundness and its legal compliance.

5.4.3 The Submission Plan was comprised of the following main documents:

- Surrey Waste Local Plan Part 1: Policies
- Surrey Waste Local Plan Part 2: Sites and areas of search
- Surrey Waste Local Plan: Non-technical Summary
- Environmental and Sustainability Report

5.4.4 The main documents were supported by a number of background documents which were also made available on the council's website. These included:

- Types of Waste Management Facilities - Non Technical Explanation
- Waste Needs Assessment (2019)
- Site Identification and Evaluation Report (2019)
- Habitats Regulations Assessment (2019)
- Delivery of Waste Management Capacity in Surrey 2008 - 2017
- Duty to Cooperate Evidence of Engagement Statement (2019)
- Issues and Options Summary of Responses Report
- Draft Plan Consultation Summary Report

5.4.5 The further technical site assessments were undertaken to support the site allocations in the Plan were also published. These included:

- Air Quality Impact Assessment (2018)
- Ecological Assessments (2018)
- Health Impact Assessment (2018)
- Landscape and Visual Sensitivity Study (2018)
- Landscape and Visual Options Study (Lambs Business Park) (2018)
- Strategic Flood Risk Assessment (2018)
- Transport Study (2018)

5.4.6 Detailed information on the bodies and persons that were invited to make representations under Regulation 18 and Regulation 19 and how this was done, as well as a summary of the main issues raised by these representations and how they have been taken into account is set out in the sections below.

6 Consultees

6.1 Overview

6.1.1 This section sets out which bodies and persons the local authority invited to make representations under Regulation 18 and Regulation 19.

6.2 Specific consultation bodies

6.2.1 In accordance with Regulation 18(2)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), consultees for the 'Issues and Options' and the 'Draft Plan' consultations were identified from those listed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulation

2012 that were considered most appropriate for the county and the new waste local plan. This included specific consultation bodies including Local Enterprise Partnerships (LEPs)², the Surrey Local Nature Partnership (LNP)³, the Environment Agency, English Heritage, Natural England, the districts and boroughs within Surrey and the authorities adjoining the county.

- 6.2.2 A list of the key specific consultees that were contacted during both consultations has been made available in **Appendix 2**.

6.3 General consultation bodies

- 6.3.1 In accordance with Regulation 18(2)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, consultees included general consultation bodies. This included groups representing various sectors of the populations in the planning authority area, such as: voluntary bodies; bodies that represent the interests of people from different religions, races, ethnicities or nationalities (such as community groups); bodies representing the interests of disabled persons; and bodies representing businesses (such as minerals and waste companies and trade associations who could have a key role in delivering the strategy). Examples of general consultation bodies include Residents' Associations, as well as environmental groups such as the Surrey Wildlife Trust.

- 6.3.2 General consultees that were considered most appropriate for the county and the new waste local plan were also notified. This generally included individuals and groups that had had previous involvement in matters relating to minerals and waste planning in the county. A list indicating the general consultation bodies that were contacted directly can be found in **Appendix 2**. Residents living in close vicinity to the sites proposed for allocation (within circa. 100 metres) as well as the owners of the sites proposed for allocation were also contacted directly.

6.4 Other consultees

- 6.4.1 It should be emphasised that the council also sought to inform other consultees, i.e. individuals and other organisations, about the consultations on the plan through means other than notifying them directly by email or letter. Further detail on the methods used as part of the consultation can be found in **Section 9** below. This is also documented in the Draft Plan Consultation Summary Report and the Issues and Options Summary of Responses report.

7 Statement of Community Involvement

- 7.1.1 The Statement of Community Involvement (SCI) sets out how and when stakeholders can influence the content of new planning policy documents. The SCI was adopted in

² The county of Surrey is situated within two separate Local Enterprise Partnerships (LEPs): Coast to Capital and Enterprise M3.

³ The Surrey Local Nature Partnership is the only LNP in Surrey and covers the whole of the county.

May 2015 and each consultation that has taken place during the development of the SWLP has been in accordance with this. An updated SCI will be adopted later in 2019, which has been amended to include information on neighbourhood planning (in accordance with the Neighbourhood Planning Act 2017).

- 7.1.2 The SCI sets out guiding principles for public engagement, including:
- Encouraging involvement at the earliest stage and throughout the planning process
 - Trying to involve everyone who may be directly or indirectly affected by planning decisions
 - Using a range of methods to make information accessible and easy for people to respond
 - Having an open and transparent process
 - Managing expectations and providing feedback to respondents
- 7.1.3 In accordance with Regulation 18(2)(a) and (b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's SCI, as part of the development of the new SWLP, the council identified both general and specific consultation bodies to consult (see **Section 6**), which were a range of organisations and people who may be affected by planning decisions in Surrey. These bodies were contacted directly by email or letter.
- 7.1.4 In order to ensure that as many groups and individuals as possible were informed of the consultations, each consultation was also widely publicised using a range of print and digital media. This was to ensure that individuals and groups who were not contacted directly, would be aware that a new waste local plan was being prepared and how they could make a representation if they chose to. Any new organisations or individuals identified through the consultations and had indicated they wished to be contacted in future, were added to a consultation database.
- 7.1.5 Further details on the methods used to inform individuals and groups about the consultations and how they were encouraged to get involved are contained in **Section 9**.
- 7.1.6 The SCI states that public consultation on what the local plan should contain should be held for a minimum of 12 weeks. The Issues and Options consultation was held for a period of 12 weeks and the Draft SWLP Consultation was held for a period of 14 weeks (including additional time for Christmas bank holidays).
- 7.1.7 The SCI states that the public consultation on the soundness of the local plan prior to submission of the local plan to the Secretary of State and the Planning Inspectorate should be held for a minimum of 6 weeks. The Submission Plan was published to allow representations to be made for a period of 8 weeks.
- 7.1.8 The SCI requires that consultation documents are published on the council's website with details of where and when paper copies of consultation documents can be viewed.

During each consultation, documents were published on a webpage for the new SWLP and were made available at district and borough council offices.

- 7.1.9 The SCI requires the council to publish a summary of the results of consultations on its website. The Issues and Options Consultation Summary of Responses report (2017) and Draft Plan Consultation Summary report (2018) provided this, and the reports outline the key issues and how the council has addressed them. A summary of the representations made on the Submission Plan were published on the SWLP webpage on a weekly basis during the period for representations (Regulation 19).

8 Local Planning Authorities (including counties), prescribed bodies and the Duty to Cooperate

- 8.1.1 There are 11 districts and borough councils within the county of Surrey. Surrey is also adjoined by 19 local planning authorities and five counties, and shares a boundary with Greater London. As specific consultees, local planning authorities within and adjacent to Surrey (including counties) were directly consulted as part of the Issues and Options consultation and the Draft Plan consultation.
- 8.1.2 Prescribed bodies were also directly consulted as specific consultees. Prescribed bodies include the Environment Agency, Historic England, Natural England, Gatwick Airport Ltd, Thames Water, and Surrey LNP (see **Appendix 2** for a comprehensive list).
- 8.1.3 In accordance with Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), constructive, active and ongoing engagement has taken place with these bodies, to maximise the effectiveness with which the plan preparation is undertaken. This has been particularly the case with local planning authorities within and adjoining Surrey, as the new SWLP deals with waste, a strategic issue that has a significant impact on all districts and boroughs within the county and other local planning authorities across the wider South East region. The details of this ongoing engagement are documented comprehensively in the Duty to Cooperate Update statement for the SWLP.

9 Consultation methods, results and outcomes (Reg 18)

9.1 Methods

- 9.1.1 This section details how bodies and persons were invited to make representations on the plan during the 'Issues and options' and 'Draft Plan' consultations under Regulation 18.
- 9.1.2 A wide range of media (newsletters, website, and twitter), correspondence and meetings was used to inform individuals and organisations about the new SWLP and seek their comments.

- 9.1.3 Notification was made at the start of each consultation to a wide range of individuals and organisation by either email or letter (approximately 1,800 individuals and organisations). This included specific and general consultees. An example of the letters sent to each consultee can be found in **Appendix 9**.
- 9.1.4 The council's website supported the consultation through a dedicated webpage, including links to PDF copies of documents. Printed copies of the documents, along with flyers, were provided in the district and borough council offices and libraries.
- 9.1.5 Surrey County Council's communications team ensured that the consultations gained publicity through the use of advertising on search engines and social media websites (such as Facebook), as well as through advertisements in papers.
- 9.1.6 Respondents were encouraged to respond to the consultation using an online survey, and a dedicated email address and postal address were also provided. The responses were received as a mix of online responses, letters and emails.
- 9.1.7 Presentations were given at meetings with planning policy officers from Surrey's districts and boroughs, as well as at meetings with elected Members and Councillors.
- 9.1.8 Representations during both consultations were read and categorised into different issues (for example, strategic objectives, policies, sites etc.). Representations were then considered, summarised and responded to, more generally for the 'Issues and Options' consultation and individually in the 'Draft Plan' consultation.

9.2 Issues and Options Consultation

- 9.2.1 The responses received to the issues and options consultation came from a variety of stakeholders, including Duty to Cooperate bodies, operators and landowners, businesses and residents. Responses related to the context of the SWLP, key issues, the draft vision and draft objectives, the approach to the Duty to Cooperate and to the identification of suitable land. A more detailed summary of the matters raised is included in the Issues and Options Consultation Summary of Responses Report (2017) but an overview is provided below.

Context

- 9.2.2 Comments received on the context of the SWLP related to the policy context for the Plan, how the need for waste management facilities was to be calculated and the housing figures that might inform this. In particular it was noted that there would need to be adequate provision of waste management for future housing coming forward in district and borough Local Plans, which cover different time periods.
- 9.2.3 Comments were also received noting that Green Belt was a key policy area as much of the county is designated as Green Belt land.

Issues

- 9.2.4 It was noted that deliverability of sites was an issue as waste management has a relatively low value compared to other types of land use in the county, such as commercial or residential.

- 9.2.5 It was also noted that when developing the Plan, there should be consideration of waste movements with other WPAs, especially with London, as there was likely to be a need for authorities surrounding London to take some of London’s waste.
- 9.2.6 It was raised that the Plan should consider the waste that is likely to arise from strategic infrastructure projects such as HS2, Crossrail and Heathrow Airport expansion.
- 9.2.7 The location and accessibility of new sites was highlighted as an issue, it was noted that sites needed to be accessible and located near to the source of waste arisings.
- 9.2.8 All consultees were supportive of the visons aim to drive waste management up the waste hierarchy.
- 9.2.9 There was widespread support for environmental protection, the importance of conserving the landscape and scenic beauty of AONBs, and the protection of the historic environment. It was noted that waste management facilities that are well operated play a role in environmental protection themselves.

Approach to the Duty to Cooperate

- 9.2.10 Consultees supported the principle of meaningful early and ongoing engagement with the DtC bodies in creation of the new SWLP. The majority of respondents noted that the approach to the Duty to Cooperate consulted on would help the council in discharging its Duty to Cooperate.

Approach to the identification of suitable land

- 9.2.11 Consultees stated a preference to see specific sites identified for waste infrastructure. It was noted that the approach to identification of suitable land should consider whether land was part of areas designated for their landscape or biodiversity value. It was raised that there should be consideration of the water environment and potential for waste sites to impact on aerodromes. Transport was another key consideration that was suggested should form a key aspect of determining whether sites were suitable for some form of waste related development.

9.3 Draft Plan Consultation

- 9.3.1 A more detailed summary of the matters raised is included in the Draft Plan Consultation Summary Report (2018) but an overview is provided below.

Vision, Objectives and Spatial Strategy

- 9.3.2 Comments made on the Vision, Objectives and Spatial Strategy of the Draft SWLP related to:
- Support for pushing management of waste up the waste hierarchy, including setting ambitious but realistic targets for recycling.
 - Concern regarding use of combustion of waste as a waste management method.
 - Concern that Strategic Objective 4 should consider encroaching on safeguarded facilities from non-waste related development.

- Comments on the spatial strategy of the plan relating to Green Belt and AONBs.
- Concern that the plan should make reference to the circular economy.
- Support for the county council's collaboration with relevant authorities, organisations and the local communities but some concern that it could do more.
- Support for zero waste to landfill, where this does not increase waste managed by energy from waste (EfW) sites unnecessarily.

9.3.3 As a result of comments received, the wording in the vision, objectives and spatial strategy was updated. Changes to wording included:

- Making clear that combustion of waste or fuel derived from waste without energy recovery ranks alongside disposal at the bottom of the waste hierarchy.
- Setting out that proposals (and decisions upon them) for development proximate to a safeguarded facility should take account of the existence of the facility.
- Adding wording regarding the preferred locations for development.
- Ensuring that the plan indicates that waste is seen as a resource and makes reference to the circular economy.

Policies

9.3.4 Comments made on the policies contained in the Draft SWLP related to:

- The specific wording of policies, including their effectiveness, with suggested amendments, additions and/or requests for greater clarity;
- The preamble text for policies, specifically suggesting further detail be added;
- Support or opposition for specific policies.

9.3.5 As a result of the comments received:

- Policy wording was reviewed and updated where appropriate.
- All acronyms within policies were expanded and technical terms were made clear in a glossary, which is included in the plan.
- Further detail was added to the supporting text for specific policies where needed, particularly for Policy 14.

Site Identification and Evaluation

9.3.6 The Draft SWLP included sites that were considered suitable for some form of waste related development. The Site Identification and Evaluation document set out the process that was used to identify and evaluate sites for inclusion in the Draft SWLP.

9.3.7 The comments made on the Site Identification and Evaluation document related to:

- Specific sieves that were used to filter out unsuitable sites, particularly Sieve B – Established Industrial Estates and Business Parks and Sieve E – Former & Operational Mineral Workings and Land Allocated for Mineral Working Sites.

- Specific issues that it was felt were left unconsidered during the Site Identification and Evaluation process.

9.3.8 In response to comments received:

- Sieve E is still considered to be robust when identifying and evaluating locations for strategic new facilities, as mineral extraction is considered to be an essentially temporary activity and communities have an expectation that the sites will be restored rather than used for waste management. The temporary nature of mineral extraction is an important factor when applications for mineral extractions are considered in the first place.
- Detailed assessment work was undertaken to further understand the suitability of the sites that were identified for some form of waste related development. The outcomes of this work have been incorporated into Part 2 of the SLWP.

Sites proposed for allocation

9.3.9 The Draft SWLP proposed sites for allocation that were considered suitable for some form of waste related development. The comments made on these sites included concerns regarding:

- Potential detrimental impacts on the areas surrounding the sites resulting from waste related development. This included impacts on areas designated as being of environmental importance, schools and other sensitive receptors.
- Impacts on air quality, the transport network, visual amenity, flood risk, noise pollution, public health and general amenity in the area of the sites.

9.3.10 Comments supporting sites were also received.

9.3.11 As a result of comments received, the wording of Policy 14 (Development Management) was strengthened and further detail was added to the text supporting the policy. The county council also commissioned assessment work to be undertaken to consider the potential impact of waste related development at each site proposed for allocation. These assessments included:

- Air Quality Impact Assessment
- Habitats Regulations Assessment
- Health Impact Assessment
- Landscape and Visual Sensitivity Study
- Strategic Flood Risk Assessment
- Transport Assessment

9.3.12 These assessments set out the constraints at each site and provide an indication of the types and scales of development likely to be suitable for development at each site. Potential mitigation measures are also suggested where possible. The key outcomes of these assessments have been incorporated into the SWLP (Part 2).

Omission sites

- 9.3.13 A second call for sites was undertaken concurrently with the Regulation 18 consultation on the Draft SWLP, where any respondent could nominate an area of land that they considered might be suitable for some form of waste management related development.
- 9.3.14 Ten sites were nominated during this second call for sites by landowners, operators and members of the public as land that should be considered for allocation in the SWLP.
- 9.3.15 Each site had been identified, evaluated and eliminated from consideration for allocation in the SWLP at the draft SWLP stage, with the exception of the nominated site '7. Land adjacent to the A25 and A22 next to Streets Court'. This site underwent the same evaluation process as all other sites and was eliminated from consideration. As a result, none of the sites nominated during the second call for sites were carried forward for inclusion in the plan.
- 9.3.16 The issues raised during these Regulation 18 consultations are documented in detail the Issues and Options Summary of Responses Report and the Draft Plan Consultation Summary Report. The Draft Plan Consultation Summary documents the authority's response to comments and, where appropriate, how this affected the contents of the Plan.

10 Period for Representations on the Submission SWLP (Reg 19) Results Summary

10.1 Overview

- 10.1.1 This section provides a summary of the main issues raised in representations made on the Submission Plan, pursuant to Regulation 20. More detail including the council's response is set out in the Period for Representations on the Submission SWLP (Reg 19) Report.
- 10.1.2 During the Period for Representations on the Submission SWLP, 173 representations were received. This included 23 representations from Duty to Cooperate bodies, 14 from other organisations and 136 from members of the public.

10.2 Introduction, vision, strategic objectives and spatial strategy

- 10.2.1 Representations on the introduction included support for the waste hierarchy, though there were queries on how targets would be achieved. There were requests for minor wording changes for clarity and a wish for more detail on environmental protection and enhancement.
- 10.2.2 There was general support for the vision and strategic objectives but with minor wording suggestions.

10.2.3 Some representations relating to the Spatial Strategy considered that the sites in the Plan are poorly distributed and that sites should be located in unpopulated areas away from sensitive receptors. However, there was also support for the application of the proximity principle and that there are no sites located within the AONB. Some representations suggested minor changes to the wording in the spatial strategy, specifically suggesting that additional towns and urban areas should be named. There was also a concern that Surrey should not be managing waste arising elsewhere in the country.

10.3 Policies

10.3.1 The majority of comments relating to policies were suggest wording changes to ensure that the meaning is as intended and provides clarity. This was particularly to do with the weighting of clauses and whether 'and' or 'or' would provide greater clarity (e.g. Policy 2, Policy 3).

10.3.2 There was general support for the majority of policies, though there were some suggested amendments and certain representors raised issues with specific policies.

10.3.3 Examples of issues raised include a representor advocating that the definition of 'waste recovery' should align with the Environment Agency's definition, representors questioning whether Policy 9 is in alignment with the NPPF and challenging whether it is appropriate for Policy 9 to list factors that might contribute towards meeting very special circumstances within the Policy.

10.3.4 In particular, a number of issues were raised relating to Policy 11a and Policy 11b. Policy 11b was questioned with regards to the evidence base for this site allocation. It was also suggested that the site based policies should include reference to the types of facility that would or would not be acceptable at each site.

10.4 Industrial Land Areas of Search (ILAS)

10.4.1 Several issues were raised relating to the ILAS in the Plan. These include:

- That there should be greater detail on the nature and type of waste management facilities that could be suitable at each site.
- That one ILAS (Byfleet Road Employment Allocation) is mostly within flood zone 3 and that it is likely that development could only take place within the portion of the site that is within flood zone 1.
- Districts and boroughs proposed that certain ILAS are removed from the list of ILAS as waste uses are not in line with the intent for these areas.
- Concern for the proximity of certain ILAS to residential uses.

10.5 Allocated sites

Land to the north east of Slyfield Industrial Estate

- 10.5.1 Three representations raised specific comments relating to the site at Slyfield. Objections to the inclusion of the site were based on the sites location in the Green Belt, the transport access to the site, that the site is located in Flood Zone 3, that the site is linked to the movement of the STW and if this does not move the site should not be allocated, and the desire for all thermal treatment to be excluded at the site.

Former Weylands Treatment Works

- 10.5.2 Some 25 separate issues were raised in representations specifically relating to the Weylands site. All of the representations received relating to the Weylands site were in opposition to inclusion of the site in the SWLP, except for one which expressed support at its inclusion.

- 10.5.3 The representations against the inclusion of the site raised a range of concerns. These included:
- That the sites location within the Green Belt makes it unsuitable for allocation.
 - The sites proximity to housing and sensitive receptors (such as schools, sports and recreational areas) and the potential impact development could have on human health and wellbeing.
 - That the existing traffic access and infrastructure is considered inadequate for development to take place, citing the existing road infrastructure (road widths and surfacing) and bridges that restrict HGV routing.
 - The potential traffic impact that development could have, mostly the impact from additional vehicle movements, HGV movements and the implications of this on congestion, road safety (vehicles, pedestrians, cyclists, speeding), vibrations, and access to a nearby Fire Station and Ambulance Station.
 - The fact that previous applications at the site have been rejected.
 - The potential impact development could have on the environmental, notably impacts of odour, noise, light, dust, visual impact, emissions and pollutants (to air, to water, to ground). Concern was expressed on the impact of these on wildlife, nature, habitats, flooding and land quality (sink hole).
 - It was expressed that better use could be made of the land, for example for residential uses, and that there are better sites available which are brownfield.
 - Representations objected to the inclusion of the site on the grounds that this would result in the area turning in to a heavy industry area, that the cumulative impact from other development would be unacceptable, that the site offers limited additional management capacity and that the location next to the railway is dangerous.

Land adjoining Leatherhead Sewage Treatment Works

- 10.5.4 Three representations were received relating to the site at Leatherhead. Representations received were: support for the inclusion of the site, concerns relating to the potential impact of development on human health (in particular relating to thermal treatment facility types) and advocating that the Plan should state the site would not be suitable for thermal treatment.

Oakleaf Farm

- 10.5.5 Seven representations raised a number of issues specifically relating to the Oakleaf Farm site:
- That the site is located in the Green Belt (moderately performing) and Very Special Circumstances would need to be demonstrated to permit development at the site.
 - That the current transport access is inadequate and results in HGV movements routing through Stanwell village.
 - Concern that development would lead to congestion.
 - Concerns relating to the impact development could have on the environment, particularly implications for air quality and the Staines AQMA, general pollution (including noise pollution) and potential impacts on SPAs, SACs and Ramsar sites. Concerns were also expressed regarding potential dust and dirt that could result from waste development at the site and increased litter on the roads.
 - Concern relating to the potential cumulative impact of waste development at the site in combination with development at Heathrow Airport.
 - Concern regarding the proximity of the site to sensitive receptors (i.e. housing) and potential impacts of development on human health and amenity, including impacts on public rights of way, bridleways and footpaths.
 - Representations noted that the site is within the safeguarding area of Heathrow Airport.
 - Representations requested that the Plan contain more detail regarding the type and scale of facility that might be suitable at this site.
 - A representation from Spelthorne Borough Council noted that the perimeter of the site should include all land available at the site.

Lambs Business Park:

- 10.5.6 Some 55 separate issues were raised in representations relating to the Lambs site. These are summarised as follows:
- Support for the site, noting that it meets the criteria for allocation as a waste site and that it was considered that policies will ensure appropriate development at the site.

- That the site is unsuitable as it is an employment site and there should be no loss of employment land.
- Objection to the development of a thermal treatment facility at the site, on the grounds that thermal treatment as a method of waste management is under review, that the south east has sufficient capacity for thermal treatment and that recycling should be improved so that it can be used as an alternative method.
- Objection to the inclusion of the site on the grounds that it is in the Green Belt. Objectors noted that the site may not be removed from the Green Belt as part of the Tandridge Local Plan and that development in the Green Belt is inappropriate. It was considered that the ‘very special circumstances’ needed for development to take place in the Green Belt do not exist. Representors also noted the need for the Plan to be consistent with Policy 9 of the Plan and the NPPF.
- That the site is undeliverable within the timeframe of the Plan.
- That the site is poorly located in regards to the location of waste arisings.
- Many issues raised related to the potential impact that development could have on the environment, specifically, air quality (from a potential facility and associated traffic, contamination and pollution (of water and air), including dust, noise, odour and light pollution. Concerns were raised relating to the sites proximity to ancient woodland, historical landscape, the AONB and AGLV, as well as its proximity to designated sites such as SSSI, Ashdown forest, SNCIs, and pSNCIs. It was also thought that the potential for development to attract gulls would be an issue.
- The issue of human health was also raised, particularly regarding the potential impact of development on safety and wellbeing due to its proximity to sensitive receptors such as housing and bridleways. Comments also related to the potential visual impact of development at the site, in particular for walking routes.
- The representations that related to transport are summarised below:
 - It was considered that the development would result in an unacceptable increase in traffic and congestion and that the road network doesn’t have adequate capacity to deal with this.
 - It was suggested that further work needed to be done to understand the in combination impact of waste development traffic and vehicle movements from residential housing proposed in the Tandridge Local Plan. It was of concern that there is already an oil extraction and storage facility present in the area.
 - It was considered that the road infrastructure in the area is poor, including poor routing for HGVs due to low bridges and poor quality surfacing (thought to be as a result of HGV movements, subsidence from being located in a wetspot and flooding) and that it will be further negatively

impacted by waste related development. It was also thought that road widths are insufficient for HGVs.

- Concerns were raised regarding the potential impact of development at the site on road safety, specifically for road users and pedestrians.
- Concerns were raised about the potential use of the disused railway siding at the site and whether this could be brought into operational use.
- It was argued that there are other sites with better transport access that should be included instead of the Lambs site.
- A number of comments related to the Transport Study undertaken for the Plan. These issues are set out in the 'Background documents' section below (**section 11.6**).

Trumps Farm

10.5.7 A summary of the comments received relating to the Trumps Farm site are set out below:

- Other WPAs expressed support for the allocation of a site for a MRF.
- Some representors commented that there was not adequate evidence demonstrating the need for the MRF facility, either in itself or at the site proposed.
- Concerns that were raised relating to the site and its transport access included concerns at its distance from the SRN, that there are issues with the quality of the local road network, that there is no possibility of rail or water transport and that HGV routing could potentially pass by residential housing. It was noted that development would be likely to add to existing congestion on the A320 and the cumulative impact from residential development and waste related development should be assessed. The transport evidence base (SWLP Transport Study, 2018) was queried, specifically with how its conclusions were applied to the Plan. There were also concerns about the impact of development on air quality from the cumulative impact of residential vehicle trips and waste related traffic.
- Environmental issues raised included that the site contains two areas of ancient woodland and is close proximity to a SANG. It was also considered that there was limited information on the impact to SPAs and SACs.
- It was considered by some representors that the site is undeliverable as it was included in the 2008 Waste Plan but development has not occurred.
- Some representors objected to the inclusion of the site as it is in the Green Belt. It was noted that the emerging Runnymede Local Plan does not propose to take the site out of Green Belt and that the 'very special circumstances' test would need to be applied for each application.

- Concerns were raised regarding the impact of development at the site on human wellbeing.

General comments on sites

- 10.5.8 Some representations were received that related to all of the sites proposed for allocation within the SWLP. The issues raised included: concern for the impact that development could have on the Strategic Road Network (SRN), the fact that four of the proposed allocations are close to sensitive receptors (housing) and support for the removal of some sites that were proposed for allocation at the Draft Plan stage.

10.6 Background documents

- 10.6.1 The majority of representations that mentioned the background documents published alongside the Submission SWLP related to the Transport Study (2018), the Site Identification and Evaluation Report (2019) and the Waste Needs Assessment (WNA) (2019). Comments were also made on the Habitats Regulations Assessment (HRA) and the Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA).
- 10.6.2 The majority of comments relating to the Transport Study (undertaken to assess the suitability of the sites proposed for allocation in terms of transport) noted that ideally more current traffic movement data would have been used to support the study, particularly in relation to the site at Lambs Business Park.
- 10.6.3 Relating to the Site Identification and Evaluation Report, comments received queried the application of the transport sieving criteria used, the employment land sieving criteria and the use of the 'Previously Developed Land' sieving criteria. Further to this, the allocation of the Trumps Farm site was queried based on the content of the Site Identification and Evaluation Report, as was the removal of additional sites that were contained in the Draft Plan (specifically Lyne Lane STW, land to the west of Earlswood STW, land at Martyrs Lane).
- 10.6.4 Representations that including comments on the WNA mostly concentrated on the recycling targets used in the assessment. The capacity gap for C, D & E waste recycling calculated in the WNA was cited as part of representor arguments that the Plan should allocate land for this specific purpose.
- 10.6.5 Two representors queried the method used in the WNA. Brett Aggregates Ltd suggest that the C, D & E arisings should be increased by 10%. WT Lambs Holdings Ltd argue that there are inconsistencies in how Surrey County Council calculated Local Authority Collected Waste (LACW) arisings and set out alternative methods.
- 10.6.6 Natural England commented that the HRA for the Plan hadn't considered all impact pathways, including noise and dust from construction.
- 10.6.7 Cappagh consider that the SEA/SA fails to consider reasonable alternatives in not making strategic allocations for C, D & E recycling facilities.

10.7 Omission Sites

- 10.7.1 Although no sites were nominated for inclusion in the SWLP that have not already been considered, several representations advocated for the inclusion of additional site allocations that were considered as part of the Site Identification and Evaluation process and were removed from consideration.
- 10.7.2 Thames Water objected to the omission of two sites that were included in the draft version of the Plan: the land to the west of Earlswood STW and land adjacent to Lyne Lane STW. These sites were removed after the Draft Plan consultation due to the change in identified need following updates to the Waste Needs Assessment.
- 10.7.3 Cappagh submitted a representation advocating for the inclusion of the Addlestone Quarry site in the Plan as a strategic site allocation for C, D & E uses. Chambers Waste Management Plc submitted a representation that Homefield Recycling and Recovery site should be included for the same reason.
- 10.7.4 NNS Chertsey Ltd submitted a representation advocating for the inclusion of the land at Kitsmead Lane as a site allocation, suggesting that the site is a better alternative than the Trumps Farm site.

10.8 Duty to cooperate

- 10.8.1 The majority of the representations received either did not comment on the Duty to Cooperate or stated that the representor felt that the Duty had been successfully discharged.
- 10.8.2 Some representations from members of the public and Godstone Parish Council considered that the Tandridge Local Plan could be incongruous with the new Waste Local Plan, stating this was specifically related to road traffic issues and use of the Lambs site for employment.
- 10.8.3 SMECH Management Company Ltd. Stated they considered there to be a lack of consideration of the cumulative impact of waste related development at the Trumps Farm site and the housing allocations proposed in the emerging Runnymede 2030 Local Plan.

10.9 Consultation Process

- 10.9.1 Several representations questioned whether the Plan had undergone each consultation stage in line with legal requirements, as some respondents noted this was the first time they had engaged with the development of the new SWLP. Some considered there to have been a lack of publicity and low awareness of the consultations.
- 10.9.2 Other representations also noted that the Plan and its supporting documents were lengthy and contained technical detail, and considered they were difficult to engage with.

10.10 Late representations

- 10.10.1 Three representations were received after 10 March when the period for representations had ended. These representations were from the RSPB, Surrey Wildlife Trust and Sussex and East Surrey Clinical Commissioning Groups.

Appendices

Appendix 1: Letters and correspondence

Below are examples of the letters sent to LEPs, environmental bodies, general and specific consultation bodies, residents or those carrying out business in the area including waste operators (i.e. those potentially delivering the plan) to notify them of the consultations.

Notification letter sent for the Issues and Options Consultation

	Minerals and Waste Planning Policy
	County Hall
	Penryhn Road
	Kingston Upon Thames
	Surrey
	KT1 2DN
	01 September 2016
Dear Sir/Madam,	
Surrey Waste Local Plan (SWLP)	
Issues and Option Consultation – Invitation to [C2C LEP/Surrey Waste Management Industry Operators/etc.]	
We are preparing a new Surrey Waste Local Plan (SWLP) that will cover the period 2018 to 2033. The Plan will include policies setting out how and where waste management can take place in Surrey in future. Amongst other things, these policies will identify sites which are suitable for hosting waste management facilities.	
You are invited to take part in our Issues and Options Consultation which is the first formal consultation stage in the process of preparing the new SWLP. An Issues and Options Consultation Report has been prepared that sets out the context for the new SWLP and proposes a draft vision and draft objectives and describes options for planning for waste management in Surrey to 2033.	
The consultation will run for 12 weeks from 2 September to 25 November 2016. You can view the associated documents and respond to this consultation via the Surrey Says consultation hub: www.surrey.gov.uk/newwasteplanreg18 .	
During this consultation we are also asking for any interested parties to put forward land in their control that they consider might be appropriate for waste management development. To help you to do this we have provided a Suitable Land Nomination Form. You can complete the form by either:	
<ul style="list-style-type: none">• Filling in the hardcopy of the form attached to this letter• Completing the online form on Surrey Says	

- Downloading a form from the Surrey website (www.surrey.gov.uk/wasteplanreview)

You may wish to nominate an existing waste management site that might be suitable for redevelopment to other waste management uses and/or increased capacity. If you choose to nominate a site we will be contacting you again to find out further details.

For further information or to discuss any issues or opportunities you may have identified please contact the Minerals and Waste Planning Policy Team at wasteplan@surreycc.gov.uk or phone 03456 009 009.

Yours faithfully,

Paul Sanderson

Minerals and Waste Policy Team Manager

Notification letter sent for the Regulation 18 Draft Plan Consultation

Minerals and Waste Planning Policy

County Hall
Penryhn Road
Kingston Upon Thames
Surrey
KT1 2DN

Dear Sir/Madam,

**Surrey Waste Local Plan (SWLP)
The Town and Country Planning (Local Planning) (England) Regulations 2012
Regulation 18 Draft Plan Consultation**

We are preparing a new Surrey Waste Local Plan (SWLP) that will cover the period 2018 to 2033. Between 2 September and 25 November 2016 Surrey County Council consulted on the Issues and Options. The county council are now consulting on a draft version of the plan.

You are invited to take part in the consultation of the draft plan between **1 November 2017** and **7 February 2018**. The draft plan provides the Vision, Strategic Objectives, Draft Policies and Proposed Sites which are intended to guide the future of waste management facilities in Surrey up until 2033.

In addition to the draft plan document there are a number of background documents which support the approach taken in the plan. This includes a draft Environmental and Sustainability Report which addresses the requirements of Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). Please note that the draft Environmental and Sustainability Report will be available to view on our website by 01 December at the latest.

Following this consultation Surrey County Council will be publishing and consulting on a pre-submission draft local plan which will then be submitted to the Government for independent examination.

The timetable for adopting the new SWLP is in the Surrey Minerals and Waste Development Scheme (MWDS). A draft version of the MWDS is available on the website and will be adopted following the outcome of the Draft Plan Consultation.

For more information, please visit the Minerals and Waste Planning Policy webpage for the consultation: www.surreycc.gov.uk/newwasteplan or email wasteplan@surreycc.gov.uk.

Kind regards,

Paul Sanderson
Minerals and Waste Policy Team Manager
Surrey County Council

Appendix 2: List of Consultation bodies

Specific Consultation bodies

Coast to Capital LEP
Enterprise M3 LEP
Surrey Local Nature Partnership
Environment Agency
English Heritage
Natural England
Homes and Communities Agency
Historic England
National Grid
AONB Management Boards Surrey Hills AONB Management Board High Weald AONB Management Board
Surrey Districts and Boroughs Elmbridge Borough Council Epsom & Ewell Borough Council Guildford Borough Council Mole Valley District Council Reigate & Banstead Borough Council Runnymede Borough Council Spelthorne Borough Council Surrey Heath Borough Council Tandridge District Council Waverley Borough Council Woking Borough Council
Adjoining Planning Authorities Bromley Borough Council Chichester District Council Crawley Borough Council Croydon Borough Council East Hampshire District Council Hart District Council Hillingdon Borough Council Horsham District Council Hounslow Borough Council London Borough of Richmond Upon Thames Rushmoor Borough Council Sevenoaks District Council South Buckinghamshire District Council Sutton Borough Council The Royal Borough of Kingston Upon Thames Wealden District Council
Waste Planning Authorities Bexley Borough Council Birmingham City Council Brighton & Hove City Council Buckinghamshire County Council

<p>City of London Cumbria County Council East Sussex County Council Eastern and Central Berkshire Authorities Greenwich Borough Council Hampshire County Council Hertfordshire County Council Kent County Council North London Waste Authority (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest) Slough Borough Council South London Waste Partnership (London Borough of Croydon, the Royal Borough of Kingston upon Thames, the London Borough of Merton and the London Borough of Sutton) Thurrock Council Warwickshire County Council West Berkshire Borough Council West London Waste Authority (Hillingdon, Brent, Harrow, Ealing, Hounslow and Richmond-upon-Thames) West Sussex County Council Western Riverside Waste Authority (Hammersmith & Fulham, Kensington & Chelsea, Wandsworth and Lambeth)</p>
<p>London Boroughs Mayor of London London Borough of Croydon London Borough of Bexley London Borough of Redbridge London Borough of Newham London Borough of Tower Hamlets London Borough of Havering London Borough of Barking and Dagenham London Borough of Lewisham London Borough of Southwark City of Westminster</p>
<p>Water Companies South East Water Southern Water Thames Water Utilities Ltd Sutton and East Surrey Water Plc Affinity Water Ltd Thames Water Utilities Ltd</p>
<p>Airports Heathrow Airport Ltd Gatwick Airport Ltd London Biggin Hill</p>
<p>Transport Bodies Civil Aviation Authority Network Rail Surrey County Council Transport for London</p>

<p>Fairoaks Airport Blackbushe Airport Farnborough Airport Office of rail regulation Highways England Marine management organisation</p>
<p>Health bodies North West Surrey Clinical Commissioning Group (CCG) East Surrey CCG Surrey Downs CCG Guildford and Waverly CCG North East Hampshire and Farnham CCG Surrey Heath CCG</p>

General Consultation bodies

<p>Environment groups Banstead Commons Conservators Blackwater Valley Recreation & Countryside Partnership Canal and River Trust Chobham Commons Preservation Committee Campaign to Protect Rural England (CPRE) Downlands Countryside Management Project Forestry Commission England Guildford Environmental Forum Haslemere and district Conservation Volunteers Horsell Common Preservation Society Nutfield Conservation Society Open Spaces Society Reigate Area Conservation Volunteers River Wey Trust Royal Horticultural Society Surrey Gardens Trust Surrey Hills Society Woodland Trust Women’s Environmental Network</p>
<p>Equalities Networks Local Valuing People Groups Learning Disability Partnership Board Surrey Coalition Faith Groups Disability Alliance Networks</p>
<p>Historic Interest Addlestone Historical Society Basingstoke Canal Authority Cobham Conservation Group East Surrey Family History Society National Trust (Surrey and West Sussex Region) Woking History Society Camberley Natural History Society</p>

<p>Holmesdale Natural History Club Surrey Archaeological Society Bulletin Surrey Industrial History Group</p>
<p>Operators, landowners and businesses Brett Aggregates Ltd. SITA UK Chambers Runfold SUEZ Thames Water Biffa Waste Services Ltd Cappagh Public Works Ltd Collier Environmental Services Ltd Harleyford Aggregates Ltd Southern Gravel Ltd Epsom Skip Hire Company Ltd Britaniacrest Recycling Ltd Agrivert Ltd Simply Waste Solutions All waste operators known to operate in Surrey were contacted.</p>
<p>Residents Within proximity (circa. 100m) of allocated sites Who indicated they wishes to be kept informed of developments with the SWLP</p>
<p>Residents Associations & Interest Groups Reigate Society Guildford Society Ottershaw Society Transition Guildford Stanwell Moor Residents Association Hersham Residents Association Horsell Residents Association Leatherhead Residents Association Leatherhead Community Association Brooklands Society Charlwood Society Chertsey Society Director for Sustainable Design, University of Creative Arts Guildford Institute London Green Belt Council Merstham Society Stanwell Moor Residents Association Surrey Association of Local Councils The Chobham Society</p>
<p>Wildlife Interest British Horse Society Elmbridge Natural History Society RSPB (South East) Surrey Beekeepers Association Surrey Wildlife Trust WWF UK</p>

In addition to the General Consultation bodies set out above, further additional groups were informed of the consultations through the Surrey County Council Equalities Network. The network helped distribute information regarding consultations on the SWLP to groups including: Local Valuing People Groups, Learning Disability Partnership Board, Faith Groups and the Disability Alliance Network.

Appendix 3: MWDS – Surrey Waste Local Plan Timetable

	Adopted	Timetable for review			
		MWDS 2014	MWDS 2017	MWDS 2018	
Surrey Waste Plan (DPD)	May 2008	Issues and Options: Sept – Nov 2016 Draft Plan: May - June 2017 Submission plan: Sept - Oct 2017 Submission to SoS: Dec 2017 Examination in Public: May 2018 Adoption: Oct 2018	Issues and Options Consultation: Sept – Nov 2016 Draft Plan Consultation: Nov 2017 - Feb 2018 Submission plan Consultation: Spring 2018 Submission to SoS: Winter 2018 Examination in Public: Spring 2019 Consultation on any modifications: Autumn 2019 Adoption: Autumn 2019	Issues and Options Consultation: Sept – Nov 2016 Draft Plan Consultation: Nov 2017 - Feb 2018 Submission plan Consultation: Jan 2019 – Feb 2019 Submission to SoS: April 2019 Examination in Public: June/July 2019 Consultation on any modifications: Sept 2019 Adoption: Dec 2019	

Appendix 4: Record of when and where Submission SWLP documents were made available

Document		Date made available	Location	
Main documents	Submission Plan Part 1 - Policies	14/01/2019	SCC website, Surrey County Council County Hall, Surrey District and Borough Council Offices	
	Submission Plan Part 2 - Sites	14/01/2019	SCC website, Surrey County Council County Hall, Surrey District and Borough Council Offices	
	Submission Plan Non-Technical Summary	14/01/2019	SCC website	
Supporting documents	Draft Plan Consultation: Summary Report	14/01/2019	SCC website	
	Waste Needs Assessment (2019)	14/01/2019	SCC website	
	Types of Waste Management Facilities Non-Technical Summary	14/01/2019	SCC website	
	Report on Delivering the Spatial Strategy	14/01/2019	SCC website	
	Industrial Land Areas of Search Identification Report	14/01/2019	SCC website	
	Site Identification and Evaluation Report	14/01/2019	SCC website	
	Technical Assessment reports	Technical Assessments: Summary Report	14/01/2019	SCC website
		SWLP Air Quality Impact Assessment	01/02/2019	SCC website
SWLP Health Impact Assessment		01/02/2019	SCC website	
Surrey Landscape and Visual Sensitivity Study of Potential Waste Sites		01/02/2019	SCC website	
Surrey Landscape and Visual Options Study at Lambs Business Park		01/02/2019	SCC website	
Level 2 Strategic Flood Risk Assessment		01/02/2019	SCC website	
SWLP Transport Study – Site Assessments		01/02/2019	SCC website	
Habitats Regulations Assessment		14/01/2019	SCC website	
SEA/SA		Strategic Environmental Assessment & Sustainability Appraisal Report	14/01/2019	SCC website

Appendix 5: Record of engagement with stakeholders (non-duty to cooperate)

Date	With	Who and how meeting was requested	Issue/ site concerned	Description of discussions	Outcome
20/06/18	Grundons	SCC requested a meeting with Grundons to discuss their response to the Reg. 18 consultation	Draft Plan, Regulation 19 representation and WNA	<ul style="list-style-type: none"> • Related to issues raised as part of the Draft Plan (Reg 18) consultation. • Targets and data in the WNA • Policies 1, 7, 8, 9 13, 15, 16 	<ul style="list-style-type: none"> • Comments noted and SCC comments logged on minutes with explanations/responses. • Resulted in an improved WNA to give operator more clarity. Will help improve the deliverability of the plan. • Resulted in some changes to the wording of policies, including significant changes to Policy 9 - Green Belt
31/08/18	Weylands Operators	SCC site visit as part of annual series of site visit for the Council's Portfolio holder	Former Weylands Sewage Treatment Works	<ul style="list-style-type: none"> • Members of the Minerals and Waste Planning Policy team and Mike Goodman, Cabinet Member for Environment and Transport, visited the site to better understand the site and its constraints. 	<ul style="list-style-type: none"> • Planning Policy team gained insight into the constraints of the site and the factors that might influence the type of development that might occur at the site.
09/10/18	Weylands landowners, Icen consultants and Elmbridge Borough Council		Former Weylands Sewage Treatment Works	<ul style="list-style-type: none"> • Landowner explained that nothing on the site would change unless it was economic to do so. • Icen consultants explained the difficulty of investing more finance in a planning process without more certainty and raised the issue of the sites Green Belt status. • The different types of waste uses were discussed along with the approach to be as 	<ul style="list-style-type: none"> • Each party was able to discuss the options for the site, in terms of Green Belt status. Elmbridge Borough Council explained that they were in the process of engaging with all those interested in developing land and that no political decision has been taken yet regarding the release of Green Belt sites.

Date	With	Who and how meeting was requested	Issue/ site concerned	Description of discussions	Outcome
				flexible as possible with a range of waste operations potentially suitable. <ul style="list-style-type: none"> • The approach in the Hertfordshire Waste Plan was discussed - expecting District and Borough Councils to review Green Belt boundaries such that allocated waste sites are removed from the Green Belt. • Elmbridge Borough Council informed the group that an Article 4 Direction now applies to the entire trading estate. 	<ul style="list-style-type: none"> • Different options in term of types of waste use and technologies were discussed - allowing all parties to better understand the type of facility that might come forward.
23/10/18	WT Lambs Holdings Ltd	WT Lambs Holdings Ltd contacted SCC to arrange a meeting	Land at Lambs Business Park	<ul style="list-style-type: none"> • The SWLP LVIA and how it is broadly in line with assessment work undertaken by Arup/Lambs consultant • Possible stack heights • Amendment to the proposal at Lambs - from waste to energy to importation of pre-bundled RDF, heat, treat and pelletise for export as a product • Intention still being to use the rail siding • Exploring options to use heat generated for district heating of new garden village proposal • The Lambs rep to the SWLP • SCC confirmed the Lambs site will remain to be allocated in the SWLP as TDC are proposing to remove the site from the Green Belt as part of the emerging TDC Local Plan. 	<ul style="list-style-type: none"> • SCC were updated on the current proposal at the Lambs site. • SCC were updated as to when a planning application is likely to be submitted on the site.

Date	With	Who and how meeting was requested	Issue/ site concerned	Description of discussions	Outcome
26/02/19	Praxis Consulting, Cissbury Consulting, Newcore Capital	David Payne (Cissbury Consulting) approached SCC to enquire about the possibility of including the Kitsmead site at Trumps Farm/Longcross within the new Waste Local Plan on behalf of the landowner.	Kitsmead Lane, Trumps Farm.	<ul style="list-style-type: none"> • Newcore Capital are currently looking at options for the Kitsmead site. • Cissbury consulting recognised that this is late stage of plan but can't help timing. Wish to be collaborative, to help enable development at the Kitsmead site and will likely to submit a representation for Reg 19. • Newcore Capital suggested that with other waste uses nearby, it makes sense to co-locate these uses, which will work better in terms of access etc. • Cissbury consulting suggested that there is a wish to accommodate waste uses other than composting on the site. Developer/operator has come forward with a proposal for an incinerator (clinical waste) at the site. Don't want to remove composting, but formalise the use. • It was also mentioned that any incineration facility would generate electricity. Facility proposed would have 10k tpa capacity and so only a small number of associated waste movements. Clinical waste is low density, but not anticipating lots of movements associated with this. • SCC expressed the view that site is not PDL, and that they are aware that Runnymede are currently making enforcement enquiries about current use. 	<ul style="list-style-type: none"> • Cissbury consulting will promote the site through examination and representations. Noted that previous site assessments didn't include area at front with hardstanding and would argue that including the front bit would enable more capacity to come forward.

Date	With	Who and how meeting was requested	Issue/ site concerned	Description of discussions	Outcome
				<ul style="list-style-type: none"> • SCC highlighted that alternative site assessment will be key in any application. Consideration should also be given to the SANG to the south and its proximity to the site. Consideration will also need to be given to the proximity to the Chobham Common SSSI and Thames Basin Heaths SPA – nutrient deposition from development, in particular incineration or vehicle emissions. 	