

Surrey Waste Local Plan

Issues and Options Consultation Questions

2016



You can download a copy of this form at:

<http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-waste-plan-adopted-plan/preparing-a-new-surrey-waste-local-plan>

If completing by hand please use BLOCK CAPITALS.

Send your completed form by email to: wasteplan@surreycc.gov.uk

Or by post to: Minerals and Waste Planning Policy Team, County Hall, Penrhyn Road, Kingston upon Thames, KT1 2DN.

Please return your completed form(s) by the **25 November 2016**.

Contact Details

Contact Name:	Michael Corbett
Company/Organisation Name (if relevant):	Elmbridge Borough Council
Contact Address:	Planning Policy Team, Civic Centre, High Street, Esher, KT10 9S
Contact Tel:	01372 474823
Contact E-mail:	planningpolicy@elmbridge.gov.uk

Introduction

The Issues and Options stage is the first formal consultation in the process of preparing the new Surrey Waste Local Plan (SWLP) that will cover the period 2018 to 2033. The Plan will include policies which set out how and where waste management can take place in Surrey in the future. Amongst other things, these policies will identify sites which are suitable for hosting waste management facilities.

This stage sets out the context for the new SWLP and identifies issues affecting the future management of waste which the Plan needs to address and options for addressing these issues. The Issues and Options Consultation Report proposes a draft vision and draft objectives and describes options for planning for waste management in Surrey to 2033.

In addition to the detailed Issues and Options Consultation Report we have published a Plain English summary document to help explain the process and the content of the documents.

All documents associated with the Issues and Options Consultation are available on the Planning Policy website (<http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans>). These documents are as follows:

- The Issues and Options Consultation Report
- Policy Paper No.1 Context and Issues
- Capacity Estimate Scoping Statement
- Assessment of Suitable Land Scoping Statement
- Duty to Cooperate Scoping Statement
- Surrey County Council Statement of Community Involvement
- Surrey County Council Local Development Scheme

This document is intended to help stakeholders respond to the consultation by setting out the specific questions we would like stakeholders to consider.

Section 1 Introduction (pp. 7 – 10 of Issues and Options Consultation Report)

Surrey County Council as the Waste Planning Authority (WPA) has to comply with specific requirements in the Town and Country Planning (Local Planning) (England) Regulations.

1a). Do you feel that the process that we are proposing to prepare the Plan (as set out in the Surrey Local Development Scheme) will meet these requirements?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

1b). If not, why not?

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

Section 2 Context (pp. 11 – 14 of Issues and Options Consultation Report)

2). Do you have any comments on the context we have set out for the preparation of a new SWLP?

There is some concern over the use of the Surrey Infrastructure Study figures as these are based on expected (constrained) delivery of houses for each of the Local Authorities from July 2015. The Study also looked at the 2012 ONS projections which have now been superseded by the 2014 projections (which we acknowledge were not available at the time that the Infrastructure Study was written). Therefore it may be appropriate for the population figures be revisited based on more up to date information. In addition it may also be appropriate for the Local Economic Assessment be revised as it was last updated in 2013.

It would be useful to include table 5 in Appendix 3 of the Duty to Cooperate Scoping Statement (with the exact figures if it is possible to obtain them) in the main body of the Report. It would also be useful (if possible) to obtain figures which set out how much of the waste created and processed in Surrey is imported / exported, especially in relation to specialist types of waste (e.g. hazardous, medical etc.) as this is part of the total amount of waste that is produced or processed within the county. Table 5 in Appendix 3 of the Duty to Cooperate Scoping Statement gives a list of WPAs where larger amounts of waste are exported to / from Surrey, but the exact figures are not given. Even if it is not possible to give the exact figures, the information in this table may be useful to present as part of the context to help give a clearer picture as regards to what currently happens to large amounts of Surrey's waste.

Another issue with the context is that there is no mention of the various Local Plan reviews which are being undertaken by various Boroughs and Districts including Elmbridge. This could result in a number of changes to the amount of development that is due to / takes place across Surrey and have an impact upon the future requirement for waste capacity and management. Therefore it would be useful to include an overview in this section.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

Section 3 Issues (pp. 15 – 17 of Issues and Options Consultation Report)

3a). Do you agree that we have identified the key issues affecting the way in which waste is managed in the future in Surrey which we should consider as part of the preparation of a new SWLP?

Issue (section no.)	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
Future growth of homes and businesses (3.2)				✓	
Transport infrastructure (3.3)				✓	
Environmental Protection (3.4)				✓	
Institutional and responsibility issues (3.5)				✓	
Resource value of waste and closing the loop (3.6)				✓	

3b). Do you have any comments on the issues?

One issue of concern is how future waste capacity and facilities will be funded. As increasing amounts of waste need to be handled, the associated costs increase as well. Ideally, information regarding how this will be approached in terms of the amount of funding that may be required, when this may be required and where this may come from e.g. CIL funds.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

3c). What other issues which might affect the future management of waste in Surrey do you think are important for Surrey County Council to consider in preparing the new SWLP?

The potential expansion of Heathrow or Gatwick airports as the Government is due to make an announcement shortly which should provide an indication as to which one may be developed. An expanded airport as well as the development / construction phase of any expansion could have a major impact on waste for Surrey regardless of whether it is Heathrow or Gatwick that takes place as they are both located just outside the county boundaries.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

Section 4 Vision, Objectives (pp. 18 – 19 of Issues and Options Consultation Report)

4a). Do you agree the draft vision for the SWLP 2018 – 2033 is:					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
Positive				✓	
Ambitious				✓	
Achievable		✓			

4b). Do you have any comments about the draft vision?

The implied ambition to manage all of the waste created within the County may not be possible due to some waste not having any appropriate processing facilities with Surrey (as stated in paragraph 5.3.2 of the Surrey Planning Services 2014/15 AMR). Greater clarity earlier within the earlier parts of the document (or the supporting sections) regarding this would assist in determining whether the ambition to meet this part of the vision is likely to be possible. In addition the ambition to have no waste go to landfill may not be possible and therefore this may not be a suitable 'target' to have within the vision. The zero use of landfill as a method of disposing of waste also conflicts with Objective 1C. The retention of capacity in landfill waste sites still may still be required even if Surrey were to become waste self-sufficient (without making use of landfill as a contingency measure) so that unforeseen circumstances can be adjusted to.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

5a). Do you think the proposed draft objectives will help Surrey County Council implement the draft vision?

Yes	✓
No	

5b). Do you have any comments about the draft objectives proposed in the SWLP (also set out in Section 5 below)?

Objective 3: it is recommended that the requirement for a buffer zone to separate any anaerobic digestion (AD) facilities from nearby residents and business is included in policy. There appears to be recognition that AD plants have the potential to have a significant detrimental affect principally from odour, that may arise / escape, despite odour control systems and management plans being in place. Environment Agency planners in the Black Country have discussed a 250m buffer zone between AD plants and residential properties.

As this issue has been raised by the Council as part of the planning application (ref. no. 2014/0222) at the Weylands Treatment Works, it is recommended that a buffer of at least 200m is introduced. This would demonstrate a forwarding thinking and protective approach and would offer a clearer message to businesses looking to select suitable sites to operate this technology in Surrey.

Objective 8 may be the most difficult to achieve due to the nature of waste transportation and the type(s) of waste that can be processed at each site, particularly in relation to specialist facilities.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

6a). Do you agree with the proposed 15 year plan period for the SWLP 2018 – 2033?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

6b). If not, what period you think the plan should cover?

A more suitable plan period may be to at least match a number of Local Authorities development plans which are going beyond the 2018-2033 time frame, e.g. Elmbridge and Runnymede which extend to 2035. Therefore it may be appropriate to make the plan last for 20 years to 2038.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

Section 5 Options (pp. 20 – 23 of Issues and Options Consultation Report)

Question 7

Do you agree with any of the proposed options for the delivery of the draft objectives?

7a). Objective 1: To increase the sustainable management of waste through waste prevention, re-use, recycling and recovery.					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
1A: Work with our stakeholders to support initiatives that help meet local targets for prevention, re-use, recycling and recovery.					✓
1B: Prioritise development of facilities which allow management of waste further up the waste hierarchy e.g. recycling preferred over recovery.					✓
1C: Reduce the waste we send to landfill by encouraging other types of facilities, but recognising that landfill is a last resort and one which we will still need to plan for.					✓
1D: Eliminate landfill entirely from Surrey over the plan period.					✓

7b). Objective 2: To encourage communities and businesses to take responsibility for their own waste.					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
2A: Work with our stakeholders to support initiatives that help meet local targets for prevention, re-use recycling and recovery. (N.B. This is the same as option 1A)					✓
2B: Promote the management of waste in locations near to communities and businesses.					✓

7c). Objective 3: To ensure new waste management facilities are developed in suitable locations.					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
3A: Generally identify suitable specific sites to meet the predicted need for new waste management facilities.					✓
3B: Generally identify 'preferred areas' to meet the predicted need for new waste management facilities.					✓
3C: Identify sites or preferred areas alongside, or within, sites identified for other forms of development in district or borough local plans, to ensure a joined-up approach.					✓
3D: Enable waste to be managed at one of the nearest appropriate locations by locating facilities as close as possible to key population centres and identified opportunities for growth, such as new settlements or major urban extensions.					✓
3E: Mitigate impacts to communities by identifying site allocations which promote sustainable methods of transport and minimise travel distances on road networks.					✓

7d). Objective 4: To make best use of land when managing waste.					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
4A: Provide enough waste management facilities to deal with the equivalent amount of waste generated in the county.		✓			
4B: Provide additional facilities needed to deal only with waste produced in Surrey.	✓				
4C: Give priority to previously developed land (PDL) including sites identified for employment uses, and redundant agricultural and forestry buildings and their environs when looking for sites and area.					✓
4D: Allow development on Greenfield sites.			✓		
4E: In recognition of the shortage of development opportunities identify sites or preferred areas which are within the Greenbelt.			✓		
4F: Promote the co-location of waste facilities within areas of non-waste development where appropriate e.g. industrial estates.					✓

4G: Identify opportunities to improve and enhance existing waste management facilities.					✓
4H: Safeguard all existing waste management facilities.	✓				
4I: Safeguard only those waste management facilities in locations which are consistent with the vision and objectives of the Plan.					✓

7e). Objective 5: To maximise the economic benefits of waste management.					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
5A: Support the development of sites which capture economic benefits from waste by creating new jobs and/or contributing to local Gross Value Added.					✓
5B: Encourage new development to reuse and recycle the waste generated from construction and demolition activities.					✓
5C: Encourage the use of materials made from recycled waste in new development.					✓

7f). Objective 6: To encourage innovation and new technologies which provide opportunities to minimise the impact of waste development on communities and businesses.					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
6A: Ensure new waste facilities are well designed, well constructed and well operated to reduce potential adverse effects on human health and the environment.					✓

7g). Objective 7: To support the reduction of greenhouse gas emissions through sustainable management of waste.					
	Strongly disagree	Slightly disagree	Neither	Slightly agree	Strongly agree
7A: Minimise the need for waste transport by locating new waste facilities in proximity to population centres.				✓	
7B: Minimise the need for waste transport by identifying and/or safeguarding sites for facilities which are needed to allow transport of waste by means other than road i.e. rail and water.					✓
7C: Encourage the generation of energy whereby waste is used as a fuel.				✓	

7h). Do you have any comments about the options for achieving the draft objectives? (Including views on whether they are realistic). Do you have any additional options you would like Surrey County Council to consider?

The Council would have expected a number of discrete options to be chosen from, but it appears that the those given would often be most appropriate in combination with others, e.g. options 1 A-D. Revised options could provided combining the existing ones, but with each of them having a different focus / weighting of each of the current options to provide separate alternatives.

1D: Eliminate landfill entirely from Surrey over the plan period. - we do not feel this is an appropriate option and that Option 1C is more suitable as landfill may still be required in some circumstances as a contingency measure.

4A: Provide enough waste management facilities to deal with the equivalent amount of waste generated in the county. - this option does not appear to aim toward Surrey 'filling in' the gaps in terms of specialist waste capacity / processing ability (which is currently lacking) in the county. This could assist in making Surrey more self-sufficient when dealing with the waste arisings.

4B: Provide additional facilities needed to deal only with waste produced in Surrey. - this option does not take account of any need to work with other bodies (e.g. London authorities) which may not be able to manage their own waste generation as part of the Duty to Cooperate. This could limit the economic benefits of waste management to limiting sites to only dealing with waste from Surrey.

4D: Allow development on Greenfield sites. - this option should only be pursued as part of a sequential approach to sites, after all sites in the urban area and those on Previously Developed Land have been utilised or are found to be unsuitable.

4E: In recognition of the shortage of development opportunities identify sites or preferred areas which are within the Greenbelt. - as per the above comment for Option 4D, a sequential approach should be taken which prioritises sites in the urban area then on PDL in the Green Belt. These should be used before other locations in the Green Belt are even considered. The use of sites in the Green Belt should only take place if exceptional circumstances can also be proven and after all areas or sites that are not within the Green Belt have been assessed and found unsuitable. Consideration should also be given to the strength of the Green Belt and the approach taken by each Local Planning Authority.

In both of the above cases for options 4D and 4E, any site selection process should be undertaken in coordination with Elmbridge and the other Surrey Boroughs and Districts via the preparation of their respective Local Plans to ensure they complement each other and avoid potentially contradictory approaches.

4H: Safeguard all existing waste management facilities. - a blanket safeguarding of sites is not a suitable option as this does not take account the suitability of the site for continued use as a waste management location. A site may be better suited to a change of use for various reasons (e.g. being unsuitable for access by HGVs) and this lack of flexibility would be in conflict with national guidance.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

8a). Do you agree with the approach set out in the Assessment of Suitable Land Scoping Statement for identifying suitable sites?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

8b). If not, why not? What alternative approach would you like Surrey County Council to consider?

At this time the Council does not wish to comment on the Assessment of Suitable Land Scoping Statement, however would like to make comments in regard to the Weylands Treatment Works, Hersham. The Council recently requested that the site be removed from from the Waste Plan. This was primarily because of the growth in residential properties around it but also because of concerns about traffic generation. It followed the last planning application for the site that was withdrawn following a considerable level of public concern. The Council's view remains that this is an unsuitable site for any future Surrey Waste Plan.

Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

9a). Do you have a site that you would like to be considered for inclusion in the SWLP 2018 – 2033?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

9b). If so, have you completed a site nomination form?

Available at: http://www.surreycc.gov.uk/data/assets/pdf_file/0018/98010/2016-08-11-Land-Nomination-Form.pdf

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Section 6 Cooperation and Consultation (p. 24 of Issues and Options Consultation Report and Duty to Cooperate (DtC) Scoping Statement)

10a). Do you have any comments regarding the Duty to Cooperate (DtC) Scoping Statement?
None.
Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

10b). Do you consider that the DtC Scoping Statement will help Surrey County Council demonstrate that it has met the DtC?	
Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

10c). If not, why not?
Continue on additional sheets if necessary. Please ensure you clearly identify each section of the document you are commenting on.

Thank you for completing this survey.