

# GAIN SUBMISSION - 24 August 2006

## SCC Submission Plan Consultation

Map, Policy or Paragraph	Specific section	Test of Soundness	Explanation
Paragraph	A4	7	<p>Unsound because it does not pay adequate attention to the <b>composition</b> of waste in terms of the nature of the material to be treated eg. biodegradable, food, paper, glass. This is important for matching the need for facilities to the nature of the material to be treated, assessing capacity requirements and determining the best technology options. When waste is treated as a resource, a breakdown of material composition is just as important as knowing which sector produced the waste when it comes to planning waste treatment facilities. (See Appendix 1, Appendix 2 and <a href="http://www.surreywaste.info/docs/facts/composition.htm">http://www.surreywaste.info/docs/facts/composition.htm</a>).</p> <p>In addition to a breakdown of waste composition by material type recognition of the importance of <b>separate collections</b> of these wastes is required. This is of crucial importance for achieving a plan that will deliver more sustainable waste management in Surrey. The Regional Plan promotes such an approach. However, at present understanding of waste composition and the importance of promoting separation is given insufficient attention in the draft Plan.</p>
Paragraph	A4	4	<p>The Plan does not address adequately the clear intention of the inspector-approved waste policies in the draft South East Plan that waste <b>composition</b> should be assessed and the treatment required matched to this. It does not take adequate account of the proposed regional policy that <b>separation</b> of waste by material type (regardless of source) should be encouraged.</p> <p>The Regional Guidance identifies the need to establish “<i>resource recovery systems based on material streams, serving all sectors.</i>” “<i>This requires a focus on key material streams (for example food waste, paper, plastics, metals, chemicals, aggregates) rather than waste origins (for example household, commercial), segregation of these as far as possible, and assessment of the most appropriate management methods to maximize recovery.</i>”</p> <p>Refer to comments on A4 relating to ground for objection 7.</p>
Paragraph	A7	7	<p>Whilst strongly supporting the principle that unsorted, unstable, untreated and biodegradable landfill should be phased out, GAIN welcomes the recognition that landfill will continue to play a part in waste management. Landfill of certain materials and residues can be a good environmental option. Best practice landfill can perform well in terms of health impacts (<i>best option in terms of health impacts in SLGAs Residual Waste Treatment Assessment Supplementary Report by Entec (page 47)</i>)</p> <p>The last sentence anticipates pre-treatment of landfill. However, the paragraph should recognise that waste going to landfill should have been subjected to “<b>appropriate sorting and</b>” pre-treatment</p>

			<p><b>"to ensure it is as clean and environmentally benign as practicable and sufficiently bio-stable to comply with Landfill Directive targets".</b></p> <p>Just because a waste has been treated as a result of materials and/or energy recovery, this does not necessarily mean that the "pre-treated" residue will be acceptable in landfill. Residue may need, or benefit from, further treatment to make it more environmentally benign in landfill or a different waste treatment process may produce a more acceptable residue. <u>It is not pre-treatment of landfill material <i>per se</i> that is important. It is the purpose and outcome of that pre-treatment that matter.</u></p> <p>For example, a thermal process may have produced energy but produced an unstable ash. Thus although the waste will have been pre-treated it will not necessarily be environmentally acceptable in landfill. Some processes may create combustion toxins as a result of the treatment process itself that were not in the materials prior to treatment. Some biological processes may distribute hazardous materials throughout the waste residue whilst others may concentrate the hazardous material in a smaller fraction of the waste residue facilitating safe disposal of this isolated fraction. Vitrification of some residue may be desirable.</p> <p>The importance of <b>sorting</b> should not be overlooked as this can avoid pollution arising from mixing of materials - the cocktail effect.</p>
Paragraph	A8	7	<p>Unsound because there is no clear commitment to managing waste reduction. A largely predict and provide approach to waste capacity is suggested and this is unacceptable given the need to achieve more Sustainable Development. Although a fall in the rate of growth is noted, there is no clear mechanism for how monitored changes will influence decision making in the plan or how <b>flexibility</b> is to be provided. As recognised in the National Waste Strategy review and picked up at a county level, significant changes in waste behaviour and initiatives such as producer responsibility are starting to have an impact on the amount of waste generated. This is an area where things have moved on significantly since the Regional Waste Plan inquiry. Changes in recycling rates have demonstrated that when provided with appropriate facilities, very significant changes in consumer behaviour are achievable in a very short time (eg. increase in Guildford's recycling and composting rate). <u>There needs to be a much clearer intention to promote reductions in waste generation, monitor achievement and ensuring the scale of facilities reflects achievement.</u> Eg. Hampshire has over-sized its incinerator capacity because it has exceeded its predicted recycling targets such that it is running out of "black bag" rubbish to burn. GAIN envisages that if Surrey achieves the changes in behaviour required to achieve a 60% recycling rate, it will also achieve a reduction in overall waste volumes. This is the experience of those individuals who are already achieving 60% recycling rates. Whilst appreciating that no disposal authority wants to be left with black bags with no facilities to handle them, GAIN calls for a much clearer strategy for influencing and responding to changes in waste generation which is likely to be a very significant issue during the life of this plan.</p> <p>See Appendix 3</p>

Paragraph	A8	7	<p>It is unsound to consider waste growth without considering whether variations can be expected in the growth of different waste materials. This can have implications for the capacity required for different types of materials to be treated.</p> <p>For example, will the proportion of biodegradable waste amenable to in-vessel composting, and therefore capable of being treated closer to communities and on a smaller scale, increase when food and garden waste collection services expand? For example, will the proportion of non recycled plastic, eg PVC, in waste increase with the planning consequence that pollution emissions from treatment would be high and not desirable near communities? (Whereas some emissions fell, emissions from British incinerators of hydrogen chloride, a dioxin indicator produced when PVC is burnt, increased by 290% between 1990 and 2000.)</p> <p>Breaking down waste growth according to composition makes it possible to identify trends and seek to influence behaviour rather than adopt an "end of pipe approach" of just accepting whatever waste is generated. For example, if use-once wipes, which are hard to break down, are a growing fraction of the waste stream, should action be taken to influence this and encourage more biodegradable or reusable alternatives? Such an approach is crucial to underpinning policies on minimisation in the plan. Data are available on Surrey's waste composition and are not being drawn upon sufficiently or updated to establish trends. Refer to Appendix 2 and <a href="http://www.surreywaste.info/docs/facts/composition.htm">http://www.surreywaste.info/docs/facts/composition.htm</a></p>
Paragraph	A8	9	<p>It is not clear how flexibility is built into the Plan to respond to possible changes in the rate of waste growth, especially if applications are presented whose capacity is based on current waste growth rates. The Regional Planning Guidance refers to incinerators being seen as capital intensive and inflexible. This issue has implications for plant selection.</p>
Paragraph	A14	7	<p>It is unsound to omit the new European measures being introduced for separate collection of batteries. This is significant because it raises a wider issue for waste planning. An important strategy for cleaning up waste treatment and residues is to remove hazardous materials from the waste stream for separate, safe handling. In the case of batteries, removing this source of cadmium will reduce the toxicity of flue emissions, ash residue or of compost outputs. To achieve this, a network of very accessible collection facilities needs to be planned for and provided across the county. A policy on separating toxic materials from the waste stream wherever practicable is required. Appropriate disposal facilities also need to be planned. This further highlights difficulties with not pursuing a policy of waste separation and with failing to identify different material streams. (See Appendix 1).</p>
Paragraph	A17	7	<p>The Plan is unsound because effective community engagement has not been achieved. Very many in the community have gone to inordinate lengths in an attempt to engage in constructive and informed debate with Surrey County Council over its Waste plans. Examples of letters sent to Surrey by thousands of residents are</p>

			<p>enclosed for information. (Appendix 4.)</p> <p>The Waste Contract with Sita UK Ltd, based around plans for two incinerators and on which there was no public consultation, has been the principal driver for waste policy in Surrey. Although Surrey has undertaken various consultation exercises, there has been no genuine engagement and dialogue with the community concerning the possibility of a rethink on pursuing plans for two incinerators even though other technologies have shown advantages in assessments.</p> <p>A statement that incineration was the preferred options was produced by Surrey prior to public consultation on Preferred Options for the Waste Plan. The BPEO was amended to promote incineration. No feasible, worked up incinerator-free option (that included harnessing energy to enable recovery targets to be met) was offered to partner authorities or the public in the recent JMWMS process. This was in spite of the fact that in an initial round of consultation by the SLGA, an incinerator- free approach was overwhelmingly supported by the public.</p> <p>Even when Surrey undertook a Waste Inquiry on Waste Treatment Options, it failed to disclose that it had just renegotiated its Waste Contract with Sita UK Ltd, reaffirming its commitment to incineration, changing the location of one of its proposed incinerators and negotiated incineration out of county until two incinerators are operational in Surrey. This contract renegotiation also coincided with but preceded the outcome of public consultation on the JMWMS. A contractual commitment to incineration has determined the outcome of policy and waste treatment option assessments.</p> <p>Very many residents consider that consultation has been treated as a process to be gone through rather than a means of developing dialogue and partnership. There is no sense of community engagement in genuine consideration of treatment options as envisaged in Waste Strategy 2000 and by the principles of Sustainable Development.</p>
Paragraph	A21	7	<p>This misrepresents the implementation of the Landfill Directive and the Landfill Allowance Trading Scheme in that it is <b>biodegradable</b> landfill that is to be cut, with penalties for exceeding allowances. It is significant that in the UK it is recognized that targets can be met by partially reducing the biodegradability of waste as well as by making some waste completely non- biodegradable. This has implications for waste treatment options.</p>
Paragraph	A22	7	<p>GAIN notes the reference that PPS10 advises that annual waste rates need not be reopened for consideration where these have been identified in a Regional Spatial Strategy. However, GAIN proposes that it would be unsound not to reconsider these figures in this instance. This is because waste growth rates are undergoing change, and have changed even since the SE Waste Strategy inquiry. (See comments on paragraph A8). There are discrepancies between the figures being used for municipal waste between the Waste Disposal Plan and the Waste Plan. The annual rates of waste are so crucial in determining capacity required that this issue merits further consideration within the</p>

			context of the Surrey Waste Plan.
Paragraph	A25	7	Unsound not to refer to the South East Plan submission draft policies and proposals on waste separation and on considering waste composition according to the nature of the material rather than just the sector producing it. Refer to comments on paragraph A4.
Paragraph	A33	5	It is not clear that the Waste Plan will achieve the longer term agenda of promoting and supporting communities in adopting more sustainable lifestyles. Many in the community do not consider that the Waste Plan will enable progress towards a more sustainable lifestyle. It is not based on community partnership and it enables combustion of waste in spite of the unsustainable impacts of such an approach on air quality, internationally important wildlife and irreplaceable resources. In the workshop to launch the Community Strategy process, the desire for sustainable waste management was by far the most attended discussion group reflecting county-wide community interest in making progress on this issue.
Paragraph	A36	7	It is stated that County and District Action Plans (including the draft Waste Disposal Plan) have informed that Surrey Waste Plan. However, no reference is made to the fact that partners in the JMWMS cannot agree on the approach to Waste Disposal to be adopted such that they have agreed to disagree. Surrey favours incineration and has only offered disposal options that meet targets based on combustion. Several Districts do not consider combustion to be an acceptable waste treatment option in Surrey and advocate biological breakdown with gas capture. Surrey is proceeding with a combustion treatment approach in advance of public consultation on its Action Plan or an agreed county position. It is difficult for the Waste Plan to be informed by the Action Plans of the JMWMS when it has preceded that process.
Paragraph	A37	7	GAIN sustains a strong objection to inclusion of the County's Waste Policy Statement as a contextual document informing the Plan.  GAIN submits that the Plan and appraisals have been distorted by Surrey's "Statements of Principle and Intent", on which there was no consultation. Much of this Statement is a recant of national and regional policy and adds little, so the elements that stand out are the references to the contract and the statement that Surrey considers incineration to be the most practicable, viable and sustainable approach currently available for residual waste. As ERM have observed, "the statements on the preferred technology and on recycling levels appear to pre-empt the outcome of the Sustainability Appraisal and it is recommended therefore that these are re-examined in the light of the Sustainability Appraisal findings." It seems curious to do an appraisal of options when you have already set out your preferred option in advance. And when you look at the planning framework, various appraisals done by consultants for this Plan and at the outcome of previous

			<p>consultations, it is very far from certain that Surrey's preferred option is the best way forward for Surrey. Anaerobic digestion and MBT both offer certain advantages for Surrey's waste. The Sustainability Appraisal states, "It is noted that the Statements of Principles and Intent indicates that incineration is regarded by Surrey County Council as the most sustainable approach presently available. It is recommended that the outcome of this appraisal is used to help inform that position."</p> <p>Due to its uncertain status and the absence of any public consultation in agreeing it, GAIN asks for reference to the "Statements of Principle and Intent" to be removed from the Waste Plan. Surrey is producing this Waste Plan wearing its Waste <u>Planning</u> hat and not as a Waste <u>Disposal</u> Authority. The Statement seems to blur the distinction and many sections of it are written from the perspective of Surrey's disposal role and PFI-based contract. By supporting incineration for Surrey's own contract-governed waste activities, this statement also encourages incineration by third parties in Surrey for other parts of the waste stream. The pro incinerator Statement is not based on planning guidance or environmental appraisals that have been through democratic consultation and should not be given status in setting the overall framework for the formal Waste Plan. It sits uncomfortably in a Plan that claims to be taking a neutral stance on the choice of technology beyond supporting the hierarchy. It cuts across the message in Regional Guidance that biological processes such as anaerobic digestion should be considered favourably. It should also be noted that biological treatment fared very favourably in Surrey's Waste Inquiry.</p>
Paragraph	B1	7	<p>GAIN welcomes the recognition that Surrey is a densely populated congested county with many designated landscapes, poor air quality and threatened bird populations. Reference should be made to the international significance and status of some of these threatened bird populations. GAIN is concerned that some of these considerations are not yet adequately addressed in the Waste Plan.</p>
Paragraph	B4	7	<p>GAIN supports many of the strategic objectives proposed but considers the second objective to be unsound as drafted.</p> <p>This should be redrafted to promote a strong commitment to reducing the amount of waste generated. It is not sustainable to accept current growth rates or adapt a wait a see approach. Leadership is required. After "Sustainable development" the words "<b>by working to reduce the amount of waste generated,</b>". Surrey residents have already shown that if given the means to make a difference over waste issues, and clear messages as to why it is important, they will respond.</p> <p>Refer to comments on A8</p>
Paragraph	B4	7	<p>GAIN supports many of the strategic objectives proposed but considers the final objective to be unsound as drafted.</p> <p>"to enable the provision of a range of waste technologies" is not an appropriate approach. Although the outcome may indeed be a</p>

			<p>range of facilities, the strategic objective should be to provide “<b>a range of waste technologies that are well suited to the composition of Surrey’s waste stream, respect existing pressures for sustainable development in Surrey and offer flexibility to optimize material recovery over time.</b>”</p> <p>This would recognize the importance of achieving a good match between facilities and waste composition. As the Regional Plan advises, this is an important step in enabling waste to be treated as a resource and moving up the waste hierarchy by maximising material recovery.</p> <p>It provides the logic behind developing a range of facilities rather than seeing this as an end in itself.</p> <p>It also establishes the importance of flexibility rather than committing to technologies that are ill suited to adapting as waste targets or composition change. Given the way waste targets have already changed in recent years it will be very important to ensure any new plant or mix of plants is sufficiently modular to enable further material recovery modules to be added.</p>
Paragraph	B4	7	<p>It is suggested that <b>protection of air quality</b> is added to the penultimate objective in view of the significance of existing problems with air quality and sensitivity surrounding this issue for new facilities as identified in the Sustainability Appraisal.</p>
Paragraph	B4	7	<p>The objective of <b>reflecting the concerns and interests of communities</b> is welcome and should be better reflected in policies in the Plan.</p>
Paragraph	B7	7	<p>See comments on B40.</p>
Paragraph	B10	7	<p>If waste composition is given greater consideration, more progress can be made in achieving a large number of smaller facilities. The Sustainability Appraisal identifies this as desirable. The key is to recognise just how much of Surrey’s waste is biodegradable and lends itself to biological treatment. For example, over 60% of Surrey Municipal Waste is biodegradable. Taking account of the fact that some of this material should be recycled, as opposed to composted, Appendices 5 and 6 show in green the amount of Surrey’s waste that can be composted (based on Surrey’s waste composition analysis). The compostable material that is recovered through separated collections (shown as solid green) particularly lends itself to in-vessel treatment in small dispersed community facilities. <u>The Waste Plan should provide a very strong steer that this waste fraction, and the equivalent from the C&amp;I sector, should be treated in a larger number of smaller facilities.</u> It should not leave it to applicants to determine the size of plant proposed in cases where the parts of the waste stream can readily be processed in the several, smaller facilities as desired.</p>

Paragraph	B12	7	<p>The generality is not accepted. If combustion processes are pursued (which GAIN would not support), such plant would be inappropriate on industrial sites or in urban areas close to residents because of the risks of emission impacts. It is not a case of the availability of such land but of unacceptable impact and risk. By contrast, small in-vessel compost facilities would be acceptable in such places closer to communities.</p> <p>GAIN submits that the <u>density of Surrey's population and the proportion of designated countryside</u>, as described in Paragraph B1, are <u>reasons for encouraging in the plan waste technologies that can be more readily accommodated close to communities</u>.</p>
Paragraph	B20	7	<p>Given the significant changes occurring in waste practice in Surrey and more widely, it is <u>not sound to use historical waste growth as an indicator of future trends</u>. To do so would be inconsistent with paragraph 18 and represent a failure to plan for waste minimisation.</p> <p>See comments on Paragraph A8.</p>
Policy	CW1	7	<p>Add at end of (ii) add <b>including working in partnership with community groups and educational services to achieve this</b>.</p> <p>Much progress in increasing recycling and composting rates in Guildford has been achieved not just through the efforts of the local authority but also from partnership with community groups such as GAIN which has developed dialogue within the community over the past 6 years and achieved a great deal to raise community appreciation of the value of recycling and composting. Such networks should be harnessed to promote waste minimisation.</p>
Paragraph	B30	7	<p>This paragraph is welcome given the significance of this sector in waste generation. It is unsound not to recognise the important role of waste <b>separation</b> as a precursor to making progress. Many materials end up in skips in construction projects which should be <b>separated and directed to re-use schemes</b> that companies have an incentive to use. Mixing of materials also diminishes opportunities for recycling of construction materials and again illustrates the importance of polices to promote separation.</p>
Policy	CW2	7	<p>Given the importance of construction and demolition waste, it is unsound for this policy to omit a specific section on <b>working in partnership with the construction industry to promote separation of waste materials on sites and encourage facilities for reuse of surplus construction materials</b>. (This is a separate issue from secondary aggregate on mineral sites.)</p>
Paragraph	B36	7	<p>It is noted that a table showing the recovery targets is not shown. GAIN has responded to the National Waste Strategy consultation stating that it would welcome Waste Disposal Authorities</p>

			<p>continuing to be given Recycling and Composting targets alongside LATS targets but that recovery targets should be dropped.</p> <p>Notwithstanding this context, GAIN submits that <u>if the Government continues to set recovery targets for Waste Authorities, a table showing these should be set out in the Surrey Waste Plan.</u></p> <p>If these targets are to continue, it will be important for <u>accompanying text to clarify that a recovery target of 84% does not equate to a landfill limit of 16%.</u> The Draft South East Plan does indeed set an overall “recovery” or “landfill diversion” target of 84% by 2020. However, the text in paragraph 8.5 of the draft South East Plan explains that in addition to the 16% direct to landfill target figure, there will also be landfill that is the residue from recovery treatment. This would in effect be an additional landfill quota. This is an important qualification that can be overlooked and that has already caused some confusion for waste planning in Surrey. It would be useful for the Surrey Waste Plan to clarify this issue which is important because it affects the significance to be attached to the landfill requirements for the residue from different waste treatment options. The issue for treatment residues would be compliance with LATS target and not the recovery or landfill diversion target.</p>
Paragraph	B40	7	<p><u>GAIN considers an approach of generally leaving industry to bring forward proposals on plant capacity and technology to be unsound.</u> Such an approach fails to take account of the findings of the Sustainability Appraisal (eg paragraphs B4 and B10) or of community aspirations.</p> <p>The Surrey Waste Plan needs to give a much clearer steer that:</p> <ul style="list-style-type: none"> <li>- The priority should be to establish facilities for biological treatment of biodegradable waste given the imperative to divert such material from landfill, its significance in Surrey’s waste stream, the potential to locate such plant closer to communities and its favourable consideration in Regional Guidance.</li> <li>- There are grounds for encouraging in-vessel biological breakdown of such waste with gas captured for energy</li> <li>- There are grounds for seeking to avoid combustion processes for treating residual municipal and C&amp;I waste.</li> <li>- There are grounds for phasing out the use of landfill for unsorted, untreated waste. Landfill capacity should only be planned for material that is a safe, bio-stable residue from treatment processes that involve cleaning and separating waste and maximising recycling, composting and bio-mechanical breakdown.</li> <li>- There are grounds for encouraging a larger number of smaller facilities for technologies and waste streams where this is feasible such as In-Vessel Composting of separately collected garden and food waste.</li> </ul> <p>This approach would fit well with the various environmental assessments and consultations undertaken for the Plan.</p> <p>Although generally not prescriptive, the draft Waste Plan is not</p>

			<p>“technology neutral”. Nor would a Plan that is “technology neutral” be sound. It is not sound planning to provide sites for all technologies and leave it to applicants to determine which technologies are proposed. This could lead to nothing but incinerators for residual municipal and commercial and industrial waste (notwithstanding (i) of policy WD5). Very many residents look to Surrey to produce a plan that shapes decisions on waste facilities in Surrey to ensure that they are as environmentally benign as possible and avoid impacts from burning waste.</p> <p>The Plan as drafted invites and enables incineration:  <u>Regarding Municipal Waste</u> - The Plan includes an appendix which states that incineration is Surrey County Council’s preferred option for residual waste. This takes no account of the environmental sustainability appraisal which raised air quality issues in relation to incineration. Under the terms of the contract, Surrey Waste Management has the right to Surrey’s municipal waste. Surrey County Council is asking Sita UK to built two incinerators in Surrey under the contract. This Contract for two incinerators is effectively the real Waste Plan for municipal waste. If the applications planned are for two incinerators it is somewhat meaningless to try to claim that the Waste Plan is technology neutral.</p> <p><u>Regarding Commercial and Industrial Waste</u> – Decisions on residual treatment technology will be left with applicants. They are likely to be influenced by the statement that incineration is Surrey County Council’s preferred option for residual municipal waste. The proposal by KTI Energy for an incinerator at Wisley taking commercial and industrial waste and imported municipal waste demonstrates that Surrey can anticipate speculative incinerator proposals as a result of its non prescriptive approach. It will be very hard to divert an applicant from incineration as a result of condition (i) of WD5 because an applicant will be able to claim that it is accepting residual material and that commercial customers will direct other materials to recycling.</p> <p>It would be unsound to presume that consents for Open Windrow Composting “<u>will be granted</u>” given problems with this technology in Surrey and given the great disadvantage of not being able to capture biogas from this process. A laissez- faire approach to technology selection would make it much harder to achieve significant in-vessel composting, including of C&amp;I waste, in Surrey which offers many advantages.</p> <p>GAIN submits that these examples amount to sound planning reasons for seeking to shape technology decisions.</p>
Policy	CW4	7	<p>Unsound because there is no undertaking to work to reduce the amount of waste generated. See comments on A8 and B4.</p> <p>The focus on inter county movements (eg the <i>equivalent</i> of Surrey arising and <i>diminishing</i> residual waste from London) has been at the expense of making a <u>clear commitment to manage rather than just accept the quantity of waste that is produced</u>. Surrey is well placed to take a lead on this rather than just to accept existing patterns of behaviour in generating waste. The Waste Plan will have a key role to play in providing a challenging, flexible planning framework for shaping the process of reducing waste generation.</p> <p>There needs to be a much clearer linkage between CW4 on</p>

			<p>capacity and policy CW1. Without this, minimisation is simply an issue to which lip service is paid with no anticipation of making any significant difference. In order to effect the necessary change, Surrey needs to resolve to make a difference, take a leadership role and empower residents to work for change. The experience of Guildford on recycling shows that progress can be made. Having been a poorly performing Borough, GAIN and Guildford BC are making a real difference.</p> <p>A real priority for the life of this plan should be tackling waste generation. GAIN advocates really pressing ahead with countywide recycling and composting over the next ten year and also starting now on waste reduction with a view to seeing real progress in the waste figures in about ten years time. Policy CW4 leaves residents with the impression that nothing is really going to happen.</p> <p>Government has recently consulted on the introduction of waste reduction targets and this Plan should take a lead in furthering and if necessary piloting such as an approach. Waste reduction is at the top of the waste hierarchy. Just because authorities are working to provide facilities to comply with the Landfill Directive, this should not deflect attention from the need to promote reduction.</p> <p>CW4 should be redrafted along the following lines:</p> <p>Add at start: <b>Having regard to the overriding priority of reducing the amount of waste generated, the waste management capacity required for all types of waste will be kept under review.</b> Permission will be granted to enable sufficient waste capacity to be provided to:</p> <p>Add new (iii) <b>provide flexibility to avoid overprovision and to respond to changes in waste composition.</b></p>
Policy	CW4	7	<p>Refer to comments on Paragraph B4. It is not sound or adequate in (ii) to seek to ensure a range of facilities is permitted.</p> <p>The policy should be amended to provide reasons for seeking a variety of facilities. <u>Facilities should be well matched to waste composition, maximise materials recovery, offer flexibility to respond to changing expectations</u> (eg increase the range of materials recovered over time by adding processes that can separate out additional materials) <u>and minimize impacts</u> (in a densely populated county with poor air quality and endangered, internationally significant bird populations).</p> <p>These factors would lead to a presumption in favour of In Vessel Composting and a presumption against Windrow Composting and Combustion processes.</p>
Policy	CW4	7	<p>It is unclear whether (i) will include landfill of the residues from waste treatment in London such as incinerator ash.</p> <p>It unclear whether, if other adjoining authorities produce Refuse Derived Fuel from MBT and Surrey develops incinerators, capacity would be provided to burn the RDF in Surrey's</p>

			<p>incinerators.</p> <p>It is unclear why (ii) refers to recovery and to diversion from landfill targets.</p>
Policy	CW4	7	<p>The Plan should include a policy promoting the separation of waste streams so that materials can be directed to the most appropriate management method for maximizing materials recovery. This is strongly encouraged by the Regional Guidance, which identifies the need to establish “<i>resource recovery systems based on material streams, serving all sectors.</i>” “<i>This requires a focus on key material streams (for example food waste, paper, plastics, metals, chemicals, aggregates) rather than waste origins (for example household, commercial), segregation of these as far as possible, and assessment of the most appropriate management methods to maximize recovery.</i>” (See Appendices 1, 5, 6 and 7)</p> <p>At present Surrey’s Plan only looks at the source of the waste (eg municipal) and suggests that “most waste streams can be managed through similar facilities.” In spite of all the excellent work that Surrey has done on waste composition, the Plan makes no attempt to identify the most appropriate facility for different types of material. If we are to capture as much material as possible higher up the hierarchy and progress towards our various recovery and diversion targets as required, achieving a match between different materials and the most appropriate facilities will be essential.</p> <p>It is particularly important to note that well over 60% of Surrey’s Municipal Waste is biodegradable. Government anticipates that systems for separation of biodegradable waste will develop early in the period for the Strategy. So this Plan needs to encourage facilities that support a widely established system of separate collection of organic materials and their extraction from mixed waste streams. The BPEO analysis (3-29) worked on the basis that “a minimum of 11 composting facilities and 11 MRFs will be required to manage municipal waste for all options”. Fewer facilities are proposed in the Draft Waste Disposal Action Plan.</p> <p>GAIN proposes that part (ii) of this policy could be amended to</p> <ul style="list-style-type: none"> <li>- <b>make provision for the need to match waste treatment facilities to waste composition,</b></li> <li>- <b>ensure appropriate facilities are provided to achieve separation of materials and</b></li> <li>- <b>to ensure that materials recovery is given priority over energy recovery for each material stream.</b></li> </ul>
Policy	CW5	7	<p>GAIN does not consider the policy on the location of facilities to be sound because it does not take account of the nature of the waste treatment proposed and its impacts. Urban areas will be ideal for certain processes such as In-Vessel Composting with gas capture. However, because of all the impacts, including pollution risks, from combustion processes, incineration (which GAIN does not consider appropriate for Surrey’s waste) should not be developed close to communities. (See Appendix 8)</p>

			GAIN sees the finding that no community in Surrey wishes to live close to an incinerator as a reason for encouraging feasible alternatives that avoid combustion impacts and that also provide other advantages such as the flexibility of modularity.
Policy	CW7	7	This policy should be amended to <u>require, as a part of the development control process, an assessment of alternative technologies in order to establish whether protection of the environment, health and amenity could be better achieved through an alternative technology.</u> This is particularly important given that so little guidance is given in the Plan policies as currently drafted to direct applicants towards technologies which minimise environmental, health and amenity impacts.
Paragraph	C1	7	This should specify “drive to divert <u>biodegradable</u> waste from landfill”. Best practice landfill could be a good environmental option for some stable residual waste and treatment residue. This paragraph should also be clear about the priority to be given to <b>materials recovery</b> above energy recovery.
Paragraph	C3	7	GAIN considers it is unsound for WD polices not to be more technology specific. Refer to objections given for B40. Although the objective of not dating is understandable, the approach is too “hands off” and vague. The <u>implications of some existing technologies have not been considered such as the desirability of harnessing biogas from biological treatment processes.</u> <u>Insufficient attention is given to the significantly different landtake requirements and impacts of a 130,000 tonnes MBT compared with a small community In-Vessel Compost facility with gas capture.</u> A more sound approach would be to draft policies recognising the considerations appropriate for currently known technologies and allowing for the possibility of new technology sharing these general characteristics. It should be borne in mind that for Municipal Waste, very early applications for two incinerators are envisaged which, if permitted, would lock up a significant part of the County’s waste stream to those inflexible and un-adaptable plants for 20 years.
Paragraph	C4	7	The approach in this paragraph is unsound. Waste type is a crucial consideration when considering which type of facility is appropriate and the capacity required for different types of facility. Refer to Appendices 1, 5, 6 and 7 and comments on A8.
Paragraph	C6	7	This paragraph should recognise the <u>importance of facilities to separate hazardous items</u> such as batteries, old paint cans, treated wood and household chemicals from the waste stream (refer to paragraph 4 of Appendix 9)  It should also <u>promote co-locating at Civic Amenity collection facilities Sites and workshops for businesses reusing salvaged materials</u> such as wood, clothes, electronic goods or furniture.

Policy	WD1	7	<p>A new condition should be added to <b>enable extensions to CA sites to provide business units for reuse of waste materials</b>. For example, no explicit reference is made to the Slyfield CA site which is currently too small to provide such needed facilities.</p>
Paragraph	C8	7	<p>It is unsound for this section not to recognise and promote the <u>importance of harnessing biogas from the biological treatment of biodegradable waste</u>. This is partly a problem arising from grouping so many types of non thermal treatment in one policy category and not considering waste composition. <u>Over 60% of Surrey's Municipal Waste and a very high proportion of Surrey's C&amp;I is biodegradable</u>. It should be a very high priority in this Plan <u>to ensure that such material is either recycled or biologically treated (without energy being wasted to combust it)</u>. Treatment should be <b>in-vessel</b> in order to ensure that the significant amounts of biogas can be captured thereby avoiding emissions and harnessing it to produce energy. For example, 60% of the output of anaerobic digestion of organic material can be biogas (methane and CO2).</p>
Paragraph	C10	7	<p>It is <u>unacceptable for so much reliance to be placed on Slyfield as a Preferred site and to signal that an Area Action Plan is to be produced when there have been no proposals to consider and no consultation has been possible</u>. It is unacceptable that no draft Area Action Plan is available for either the Guildford Local Development Framework Consultation or even the final stages of the Waste Plan consultation. It is understood that there are significant highway problems with the scheme. Flood risk remains an issue of concern to GAIN.</p> <p>We refer to our comments made at the preferred options stage which still apply.</p> <p>"It is very hard to comment on the identification of Slyfield as a preferred site in the Plan when no information is available about the proposed Slyfield Action Plan. It is a very serious issue that it is not possible to make informed comments about one of only two preferred sites in the county during the statutory consultation period for the Plan. We look to Surrey for advice on how this issue will be addressed in a manner that achieves fair and acceptable standards of consultation, bearing in mind that comments on the Slyfield element may have consequences for other parts of the Plan."</p> <p>"We are particularly concerned that as a consequence of only identifying two "preferred" sites, given the prevalence of Green Belt in the county, pressure could be placed on these two sites to accept inappropriately large facilities. The Plan should place very clear size limits on facilities at any site, given traffic, pollution, landscape and other sustainability impacts. For example Slyfield may be appropriate for some kind of biological treatment facility but is not large enough for a full scale MBT plant. For example, the landscape and traffic impacts would be too great and it is too close to residential areas."</p> <p>We also note with concern that the "Pre Submission Consultation Statement" understates the public consultation feedback in relation to Slyfield. It states in paragraph 83 of page 16 that there were 117 comments on this site and that some included the</p>

			<p>caveat EfW should not be considered for this site. In practice far in excess of 1,000 consultees responded on Slyfield as follows: 'I oppose any of the sites being "preferred" or "safeguarded" for "energy recovery/thermal treatment". I oppose Slyfield being one of only two "preferred" sites for major waste facilities in Surrey. The Sustainability Appraisal advises that there should be a larger number of smaller sites, which would reduce the burden on Slyfield. Slyfield cannot be expected to accommodate an overly large facility with all the traffic, landscape and pollution impacts this would involve. I am also anxious that the plan could allow incineration at the sewage works at Slyfield and at the overall bias towards incineration in the Plan which could result in proposals for incineration at Slyfield.'</p> <p><u>GAIN seeks an assurance that there is sufficient flexibility in the Plan process to enable full consultation to take place on the Slyfield Area Action and the role of waste treatment provision within this.</u></p>
Policy	WD2	7	<p>Slyfield:</p> <p>Policy section (ii) a) should <b>explicitly recognise that inclusion of this site is subject to Consultation on the Slyfield Area Action Plan.</b></p> <p>The key development criteria set out in the Proposals Maps should also recognise that the <u>scale of waste development appropriate would be determined not just by the area of land potentially available but also by the scale of activity that would keep impacts within acceptable limits</u>, noting also the <b>importance attached to a larger number of smaller facilities in the Sustainability Appraisal.</b></p>
Policy	WD2	7	<p>Policy WD2 on non-thermal processes takes <b>inadequate account of the different site requirements of various types of process and of the nature of the waste to be treated.</b> These factors have major implications for the suitability of any location. A resource recovery park using Mechanical and Biological Treatment has different land use needs from an in-vessel compost facility for local food and garden waste.</p>
Policy	WD2	7	<p>Policy WD2 also fails to take full account of the <b>potential for recovering energy from gas</b> which should be <b>encouraged in any non-thermal facilities involving the biological breakdown of biodegradable waste.</b></p>
Policy	WD2	7	<p>Text should be added at the end to ensure proposals made under this policy <b>further the strategic objectives in B4.</b></p>
Policy	WD4	7	<p>Policy WD4 sets out how Open Windrow Composting "<u>will be granted</u>". This is in spite of serious problems with this technology in Surrey. Sita UK has failed for seven years to provide such a facility even though this was required under the 1999 contract and two facilities in Surrey provided by other operators are recognised as environmentally unacceptable. One has been closed down. Surrey County Council's Select Committee inquiry into waste</p>

			<p>concluded there were problems with this technology and that composting should be undertaken in-vessel as advocated by GAIN. This has the important added advantage that the gas can be captured and used for energy. So why invite applications for Open Windrow Composting in the Plan?</p> <p><u>A so-called technology neutral approach enabling such open composting does not reflect Surrey's needs or aspirations and does not draw on the environmental assessments in the Sustainability Appraisals.</u></p> <p>This policy is <b>unsound and should be deleted and replaced with a policy promoting In Vessel Composting with gas capture</b>. This technology <u>merits a separate policy because it can be accommodated on relatively small urban sites and has modest impacts</u>. As it treats a significant waste fraction that it is undesirable to transport long distances (food and garden waste) it is particularly appropriate to pursue the advice of the Sustainability Appraisal for this technology and develop a <b>larger number of smaller facilities</b>. On this basis, possible sites might be more readily found than for larger facilities.</p>
Paragraph	C25	7	<p><u>To assume 1 to 3 incinerators in a so-called technology neutral plan is unsound</u>. It is possible that the capacity referred to from the need assessment for 1 to 3 incinerators could instead be met by MBT based on biological breakdown of waste with gas capture (eg Anaerobic Digestion). This approach is advocated by several Local Authority partners in the JMWMS. (Appendix 9 gives an outline of a possible non-thermal approach.) MBT emerged as an attractive option in Surrey's Waste Treatment inquiry. The Babbie need assessment is weak in its consideration of waste composition and therefore not well placed to match technology to material to be treated. Nor can it consider relative impacts of various technologies. It assumed incineration, the Plan should not. The text of C25 should <u>not assume any incinerators in Surrey as the best outcome</u>. <b>Biological treatment facilities are an early priority</b>.</p>
Policy	WD5	7	<p>Unsound to grant permission for thermal treatment as proposed. There should be a <b>much stronger presumption in favour of non-combustion processes for residual waste</b>.</p> <p>Delete "will normally be granted provided"</p> <p>There are sound reasons for adopting a far more cautious approach to thermal treatment in Surrey even for waste that cannot reasonably be reused, recycled or processed to recover materials.</p> <p>There are significant grounds for planning to give preference to treatment processes that avoid combustion:</p> <p>As the Sustainability Appraisal signals, Surrey is a densely populated county with many designated landscapes, both rural and urban. This makes it hard to identify sites for thermal treatment facilities with significant impacts and associated risks. The Waste Plan should encourage as far as possible types of facilities that make better neighbours and that have lower impacts rather than inviting waste contractors and commercial waste operators to submit thermal treatment applications.</p>

There have been over 87,000 objections to incineration in Surrey, the majority of which have supported feasible alternative approaches to meeting waste targets. Significantly, communities that have faced the prospect of incinerator applications have not only voiced strong opposition to those proposals but also argued against thermal technology elsewhere on the basis that they would not wish it on other communities either.

In numerous consultations the public has repeatedly called for an incinerator-free approach to waste treatment in Surrey. Given commitments of Sustainable Development objectives, in Waste Guidance and in the Community Strategy to working in partnership with the community, this level of public concern to avoid incineration is a legitimate planning consideration.

The wisdom of using energy to burn waste is an increasingly significant issue as fuel resources become more scarce and expensive. This is especially significant when waste materials have a high water content or when alternative technologies are available that avoid the need for combustion.

The impact of combustion outputs such as nitrous oxides from incinerators would be a significant issue in Surrey. (See Appendix 8) Air quality already fails to meet standards, as a result of emissions from roads and airports.

Very importantly, air quality, especially acid deposition, is a critical factor for the threatened Thames Basin Heaths SPA protected under the Habitats Directive. (See page 34 of Appropriate Assessment report) GAIN submits that it is an inadequate response to the Appropriate Assessment to identify a threat to the SPA but simply to signal the need for further assessments if specific incinerator proposals are brought forward. GAIN argues that under the Habitats legislation and guidance it would be more appropriate to encourage readily available, **alternative technologies** in the Plan, such as MBT which can meet targets, is feasible and affordable. (See Appendix 9). The weightings to be attached to air quality and wildlife impacts need to be increased in the light of more recent information on threats to the Thames Basin Heath SPA and other designated sites.

It should also be recognised that incineration is low down the waste hierarchy in that it only really recovers energy. The Waste Plan should encourage alternative technologies for treating residual waste that have greater potential to increase material recovery over time. (See Appendices 7 and 9)

The case for sites for thermal treatment is based on:

- Unsound BPEO assessment in which the weighting given to practicality was doubled from 22% to 44% in order to elevate incineration to best option and in which a mathematical error involving multiplying 0 favoured incineration. (Refer to Appendix 10 for comments on the BPEO report which shaped the Plan.)
- Surrey's unsound Waste Policy statement that was produced separately from the waste planning processes and without public consultation and
- A renegotiated contract for two incinerators that has pre-empted the outcome of public consultation on the JMWMS.

Following the model of policy WD7, the thermal treatment facility

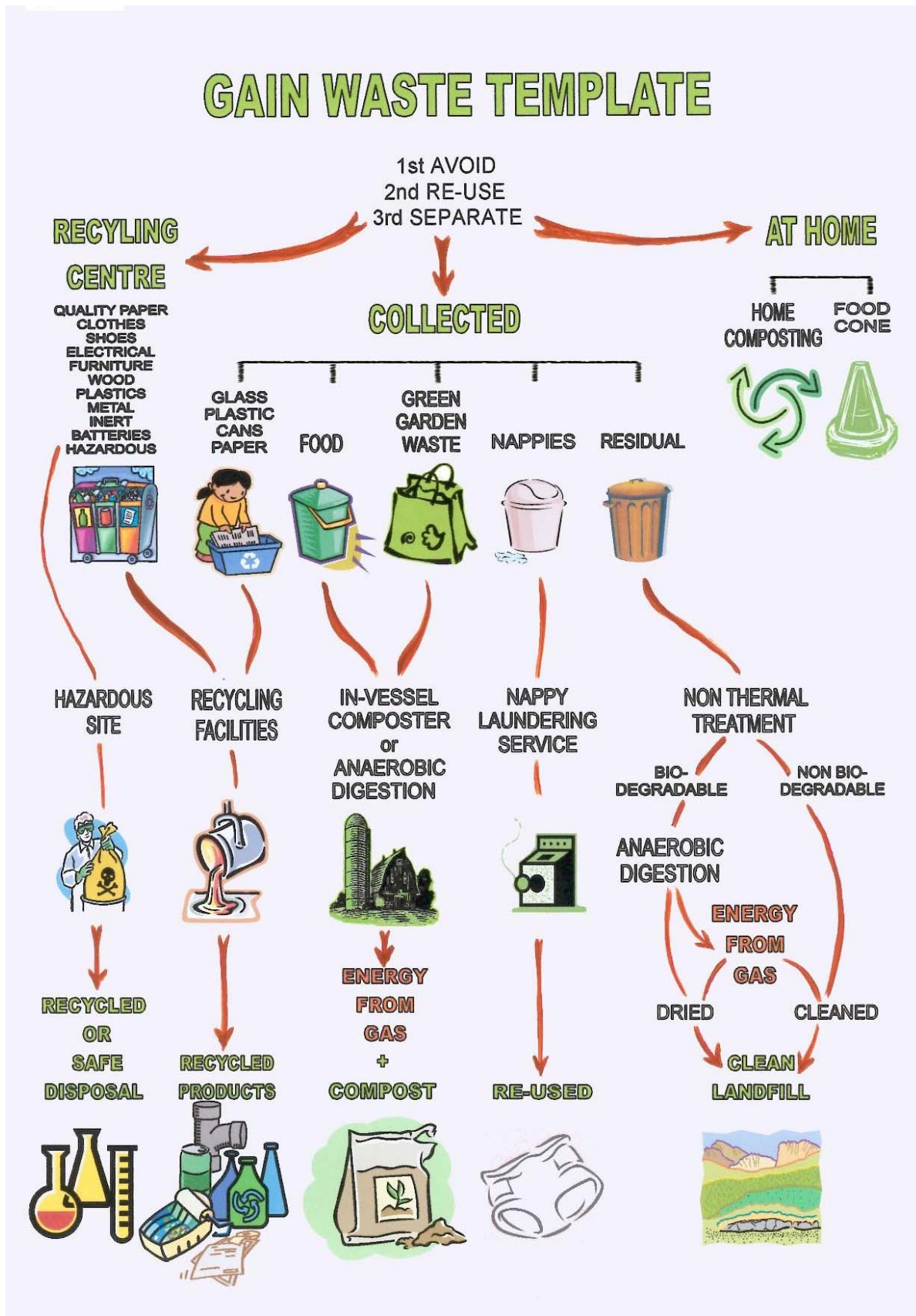
			<p>policy should be amended along the following lines:</p> <p><b>“Planning permission for development involving the thermal treatment of waste will only be granted provided...”</b></p> <p>and include the additional proviso at the end of (i)</p> <p><b>“ ... and failing this that it cannot reasonably be treated using non-combustion processes producing residue compliant with Landfill Directive targets;</b></p> <p>Following the model of the Policy WD7, text should be added as follows <b>“In granting permission for thermal treatment such as incineration, conditions may be imposed limiting both the type and quantities of waste to be burnt in order to ensure that energy is not expended burning biodegradable material that is amenable to biological treatment and also that potentially hazardous materials are separated out to prevent avoidable contamination of emissions and ash residues.”</b></p> <p>Text should be added at the end to <b>ensure proposals made under this policy further the strategic objectives in B4.</b></p>
Paragraph	C30	7	<p>Unsound because it does not make provision for <u>encouraging biological rather than thermal treatment of this biodegradable waste with a very high waster content</u>. The wisdom of drying this type of waste in order to burn it would be very questionable in terms of energy consumption. The plan should not be technology neutral but steer towards a good match between the biological nature of the waste material and in-vessel biological treatment processes such as anaerobic digestion.</p> <p>The <u>unqualified invitation to co-dispose of sewage and other wastes is unsound</u>. This would not be acceptable if the introduction of another kind of waste resulted in a proposal for a thermal facility. This policy should be redrafted to ensure that the location of sewage treatment facilities does not become a mechanism for obtaining consent to treat other waste on sewage treatment sites. For example, it would contradict the planning policy objectives for Slyfield if a plant for co-disposal of sewage and other waste in a thermal facility were proposed.</p>
Policy	WD6	7	<p>This policy could lead to a proposal to co-incinerate sewage and other waste at sewage treatment sites such as Slyfield. It needs clarifying to eliminate this possibility.</p> <p>It also needs amending to add a <b>presumption that treatment will employ a biological rather than combustion process.</b></p>
Policy	WD8	7	<p>See comments on A7</p> <p>A condition is required to <b>ensure the material to be landfilled has been subjected to appropriate sorting and pre-treatment to make it as clean and environmentally benign as practicable and sufficiently bio-stable to comply with Landfill Directive targets”.</b></p>

Policy	DC3	7	<p>It is important to consider not just health impacts but also <u>risks and consequences</u>. This is relevant where there is uncertainty about impacts and where there is the possibility of accidents or events resulting in deviations from the normal range of impacts. Risk assessment also requires the <u>consequences</u> of any perturbation to be considered. For example, will a body of drinking water or many residents be affected? (eg Buncefield Depot) Will a flood lead to contamination?</p> <p>In (xvi) "<b>and risks and the consequences;</b>" should be added after impacts</p>
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**Appendices 1 to 10 follow -**

Appendix 1

Municipal Waste Streams Based on Waste Composition:



## Appendix 2

### Composition of Civic Amenity Site Waste Surrey (2003 sample)

Countywide composition of waste taken to CA sites

Average per visitor based on weighted visits per site

Total visits to sites =		3,584,196				TOTAL PER ANNUM			
		%		tpa		tpa			
Newspapers and magazines	Paper and card	2	6	2,264	7,699				
Directories and catalogues		0		574					
Wall paper		0		91					
Paper packaging		0		272					
Non-packaging paper		1		1,224					
Cardboard packaging		2		2,926					
Non-packaging cardboard		0		54					
Books		0		294					
Plastic film	Plastic film	0	0	198	337				
Non-packaging plastic film		0		139					
Dense plastic packaging	Dense plastic	0	2	466	2,083				
DIY dense plastic items		0		60					
Other non-packaging dense plastic		1		1,557					
Man-made textiles	Textiles	2	2	2,228	2,524				
Natural textiles		0		296					
Shoes	Misc. combustibles	0	15	142	19,524				
Wood and cork packaging		0		215					
Non-packaging wood		7		8,844					
Carpet		2		2,723					
Kitchen units		0		428					
Furniture		4		5,590					
Flooring/tiles		0		535					
Other household combustibles		1		1,047					
DIY rubble	Misc. non-combustibles	9	11	12,486	14,572				
Other DIY non-combustible		0		622					
Other non-combustible		1		1,463					
Packaging glass	Glass	2	2	1,979	3,171				
Non-packaging glass		1		1,192					
Compostable putrescibles	Putrescibles	0	49	272	65,071				
Garden waste		46		60,118					
Soil		3		3,365					
Non-compostable putrescibles		1		1,316					
Ferrous packaging	Ferrous metals	0	4	177	5,547				
DIY ferrous metal		0		19					
Other ferrous metal		4		5,350					
Non-ferrous packaging	Non-ferrous metals	0	1	14	837				
DIY non-ferrous metal		0		0					
Other non-ferrous metal		1		823					
White goods	WEEE	2	5	2,472	6,645				
Other electrical items		1		1,224					
Computers		0		232					
Televisions		1		1,348					

Other large electronic items		1		753				
Mobile phones		-		-				
Other small electronic items		0		616				
Paint cans	Hazardous	0	1	259	1,959			
Oil		0		184				
Lead acid batteries		1		1,169				
Other batteries		0		4				
Clinical waste		0		1				
Pesticides		0		20				
Asbestos		0		2				
Other hazardous waste		0		320				
Fines		Fines		0		0	358	358
Other		Other		0		0	145	145
Mixed household	Residual	1	1	1,127	1,127			
<b>Total weight</b>		100	100	<b>131,598</b>	<b>131,598</b>			

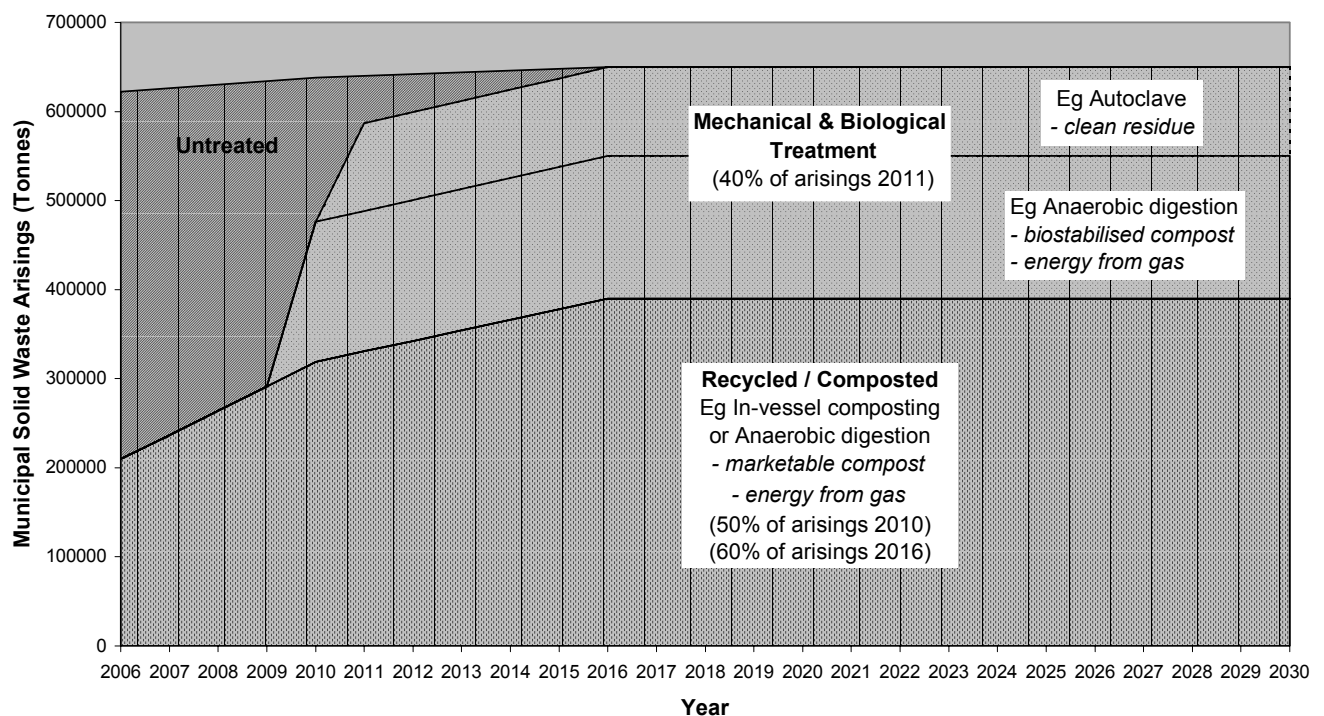
### Appendix 3:

#### How Much Waste?

Possible Target for Growth in Municipal Waste in Surrey: Arisings Capped 2016

(Assumes no material exported to Allington for incineration. Under the eport ot Allingotn scensrio there would be more time to bring treatment facilities on stream)

#### Indicative Waste Management Methods for Surrey



## How Much Waste?

There are encouraging signs that the rate at which municipal waste arisings are increasing is slowing down. As awareness about waste increases and waste minimization measures start to have greater impacts upon producers and consumers, further reductions in the rate at which waste is generated should be possible.

GAIN submits that a reasonable ambition would be to work towards a levelling of municipal waste generated in Surrey from 2016 onwards (see Appendix 3). This gives ten years for waste minimization policies to impact on behaviour. Using Entec's figures produced for the SLGA, this would mean working towards Surrey's municipal solid waste reaching a plateau at about 650,000 tonnes by 2016. If the number of households in the county continues to increase, this stand-still target would represent a marginal reduction in waste generated per household. This compares with Entec's proposal to plan for 705,000 tonnes of waste by 2030.

## Is GAIN's proposal reasonable?

A comparison with the recycling targets may be useful. At the time Surrey's contract with Sita was drawn up, a 12.5% recycling figure was considered ambitious. Now far higher figures are being achieved and planned for. Waste minimization policies and legislation will mean nothing and will have failed if in ten years time we are unable to achieve modest per household reductions in the amount of waste generated.

## Waste Prevention Targets:

Government is consulting over the possibility of introducing waste prevention targets. GAIN's assessment is that Surrey would be unlikely to achieve a 60% recycling and composting target without making some progress on waste growth rates. Residents will have become much more waste conscious and packaging directives will have started to take effect. Already, with a national recycling figure of 23.5% (2004-5), Defra is observing that the rate at which waste is being generated is slowing.

## Planning for Waste Prevention

GAIN is supporting the assumption in the draft Waste Disposal Plan, that for the next 10 years the amount of waste generated per person will fall by 0.84% overall. This equates to a fall of 0.08% per person per year. During that period, a prime focus will be getting recycling and composting targets up. However, GAIN is suggesting that during the following 10 years (2016 to 2026), slightly more progress should be being made in reducing very gradually per capita waste generation. Obviously Surrey does not want to undersize its waste facilities. GAIN is proposing a very modest per person reduction in waste generated of 4.76% between 2016 and 2026. This would mean an average fall in the waste generated per person of 0.49% per year for ten years. GAIN is working on the assumption we will need a residual capacity of 260,000 tonnes.

(NOTE: GAIN's figures use the county's estimate of 1.188 million residents in Surrey by 2026)

## Appendix 4:

### Examples of Letters Sent by Residents to Surrey CC Seeking to Engage in Development of Waste Policies

Letter Signed by 1638 Residents Concerning the SLGA Waste Strategy

Dear Cllr Stevens

#### BIOLOGICAL BREAKDOWN: BETTER THAN BURNING

This letter is my response to the Joint Municipal Waste Management Strategy (JMWMS) consultation.

I note with very great interest that it is possible to deal with Surrey's waste remaining after 60% recycling and composting in a way that:

- avoids incineration or other combustion
- meets targets and leaves flexibility for future progress
- fares well in cost and environmental assessments
- generates energy and
- enjoys the support of several Districts and Boroughs in Surrey.
- I call on Surrey to pursue an incinerator-free approach and support GAIN's incinerator-free hybrid option, involving biological breakdown of waste remaining after minimisation, recycling and composting.

I ask Surrey County Council to drop its plans to build two incinerators by 2009 and to develop instead two facilities based on Anaerobic Digestion by 2010-11 (with gas used for energy and residue cleaned and bio-stabilized).

I also ask for:

- county-wide kerbside collections of separated materials for recycling, including food waste
- civic amenity sites to be upgraded as recycling centres
- local in-vessel compost facilities using food and garden waste to produce premium compost and energy from gas
- incentives for separating waste and reducing the amount produced
- a recycling and composting target of 60% by 2010/11 (Slyfield is achieving 60%) and
- a target to level off residual waste at no more than 260,000 tonnes by 2016
- an end to all untreated, unsorted landfill but greater scope for cleaned, bio-stable landfill

The public has taken the trouble to submit over 85,000 objections to incineration in Surrey and strongly supported feasible incinerator-free approaches. I am delighted that some Surrey Districts and Boroughs support an incinerator-free strategy. Partnership with residents, who would be motivated by an undertaking to avoid incineration, is surely the best way to meet waste targets and to avoid paying penalties for sending dirty, unsorted waste to landfill.

The questionnaire uses the word incineration (albeit dressed up as energy recovery), recognizes that this technology has a poor reputation with some people, and acknowledges that some authorities would prefer to see biological breakdown of waste instead of burning. In these respects the questionnaire is more open than previous consultations. However, in the previous JMWMS consultation in 2003 residents were offered an incinerator free option (option h) which they overwhelmingly supported. It is wholly unacceptable that Surrey CC, as Disposal Authority, is not offering a worked up incinerator-free option this time, especially given the feasibility of such an approach. I cannot support a plan which commits to providing waste treatment facilities without saying what they would be, when I know the County's preferred option is incinerators.

I am deeply concerned that anyone relying on the current questionnaire will not realize that Surrey County Council plans to:

- burn most of Surrey's waste out of the county for the next few years, then
- burn 44%, and later 40%, of our waste in two Surrey incinerators as soon as they are built.

Crucially, they will not realize that the County Council sees this questionnaire as the last public consultation hurdle before pressing ahead with applications for two incinerators via its waste contractor, SITA.

The public should be:

- alerted that the key issue to be resolved in this JMWMS consultation is whether the community endorses Surrey CC's plan to build two incinerators or would prefer an alternative approach
- invited to comment on Surrey's Waste Disposal Plan to burn our residual waste,

- informed that Surrey considered six residual waste options involving burning waste but did not consider one incinerator-free option that included harnessing energy from gas, and
- made aware that incineration does not come out as the best option in assessments.

I am concerned that Surrey seems to be going to great lengths to try to marginalize the responses of residents who take the trouble to respond to waste consultations. I note with interest that the Government's guidance on Waste

Strategies advises:

- Engagement with the local community should be an important and integral part of the decision making process
- Authorities should engage the local community innovatively and actively at an early stage.
- Appropriate consultation should be continued throughout the Strategy development process.
- Strategies should reflect both community aspirations and ensure cost-effective compliance.

Surrey County Council's approach of promoting only incineration does not inspire confidence that genuine partnership with the community is sought.

Please enter the following answers from me under the appropriate questions in the questionnaire:

I would like to sign up to the Surrey waste minimisation pledge.

Q1. The 3 most important factors that would allow me to contribute to waste minimisation are:

Information,

Incentives,

Other (less packaging on products designed to last, be updated or be repaired)

Q2. The 3 following facilities would most assist me to increase my recycling and composting efforts:

Improved recycling facilities at Civic Amenity Sites

Improving range of materials collected at kerbside

Other (packaging and products designed to be recycled or composted)

Q4. The 3 most important criteria in determining the process used to treat residual waste are:

Other (avoid combustion impacts)

Other (health and environmental impacts and risks)

Other (flexibility to recover more materials over time, rather than burning them)

Q5. My comments on the best way to deal with waste left over from minimisation, recycling and composting are:

**Biological breakdown not burning.** I support GAIN's **incinerator-free** hybrid option: Anaerobic Digestion with Energy from Gas, and potentially Autoclave, with residue cleaned and bio-stabilized.

I do not support Surrey County Council's draft Waste Disposal Plan. I support the Boroughs and Districts that are working for an incinerator-free approach.

Yours sincerely...

---

Michael Jennings  
 Head of Policy and Development  
 Surrey County Council  
 County Hall  
 Penrhyn Road  
 Kingston Upon Thames  
 Surrey  
 KT1 2DT.

Dear Mr Jenning

Surrey Waste Plan 2006 Consultation

I wish to register the following concerns about the Surrey Waste Plan 2006.

I would like to see policies on waste separation in the Surrey Waste Plan based on data on waste composition. Such an approach is advocated in the SE Waste Plan.

I do not accept that the draft Waste Plan is “technology neutral”. Nor would I want a Plan that is “technology neutral”, where Surrey provides sites for all technologies and leaves it to applicants to determine which technologies are proposed. This could lead to nothing but incinerators for residual municipal and commercial and industrial waste. I want a Plan that shapes decisions on waste facilities in Surrey to ensure that they are as environmentally benign as possible and avoid burning waste.

The Plan as drafted invites and enables incineration:

Regarding Municipal Waste - The Plan includes an appendix which states that incineration is Surrey County Council's preferred option for residual waste. This takes no account of the environmental sustainability appraisal which raised air quality issues in relation to incineration. Under the terms of the contract, Surrey Waste Management has the right to Surrey's municipal waste. Surrey County Council is asking Sita UK to build two incinerators in Surrey under the contract. This Contract for two incinerators is effectively the real Waste Plan for municipal waste. If the applications planned are for two incinerators it is somewhat meaningless to try to claim that the Waste Plan is technology neutral.

Regarding Commercial and Industrial Waste – Decisions on residual treatment technology will be left with applicants. They are likely to be influenced by the statement that incineration is Surrey County Council's preferred option for residual municipal waste. The proposal by KTI Energy for an incinerator at Wisley taking commercial and industrial waste and imported municipal waste demonstrates that Surrey can anticipate speculative incinerator proposals as a result of its so called “technology neutral” Plan.

I wish to see Policy WD5 changed so that it no longer states that, subject to conditions, “Planning permission for development involving the thermal treatment of waste will be granted...” There should be a much stronger presumption in favour of non-combustion processes for residual waste.

Policy WD2 on non-thermal processes takes inadequate account of the different site requirements of various types of process and of the nature of the waste to be treated. These factors have major implications for the suitability of any location. A resource recovery park using Mechanical and Biological Treatment has different land use needs from an in-vessel compost facility for local food and garden waste. Policy WD2 also fails to take full account of the potential for recovering energy from gas.

I am concerned that policy WD6 could lead to a proposal to co-incinerate sewage and other waste at sewage treatment sites such as Slyfield. This policy needs clarifying to eliminate this possibility.

Policy WD4 sets out how Open Windrow Composting “will be granted”. This is in spite of serious problems with this technology in Surrey. Sita UK has failed for seven years to provide such a facility even though this was required under the 1999 contract and two facilities in Surrey provided by other operators are recognised as environmentally unacceptable. One has been closed down. Surrey County Council's Select Committee inquiry into waste concluded there were problems with this technology and that composting should be undertaken in-vessel as advocated by GAIN. This has the important added advantage that the gas can be captured and used for energy. So why invite applications for Open Windrow Composting in the Plan?

A so-called technology neutral approach lacks credibility, does not reflect Surrey's needs or aspirations and does not draw on the environmental assessments in the Sustainability Appraisals.

I submit that the Surrey Waste Plan needs to give a much clearer steer that, for residual municipal and commercial and industrial waste:

- Surrey wishes to avoid combustion processes for treating waste
- Surrey wishes to encourage in-vessel biological breakdown of waste with gas captured for energy
- Surrey wishes to phase out the use of landfill for unsorted, untreated waste. Landfill capacity should only be planned for material that is a safe, bio-stable residue from treatment processes that involve cleaning and separating waste and maximising recycling, composting and bio-mechanical breakdown.

This approach would fit well with the various environmental assessments and consultations undertaken for the Plan.

Yours sincerely

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Surrey Waste Plan,  
Freepost SEA 12430,  
Thornton Heath,  
CR7 7XT

Dear Sir/Madam,

### **Surrey Waste Plan: Preferred Options Consultation**

Please treat the following short answers as a response to the questionnaire "Let's Not Bury the Problem..." and my further comments as a response to the more detailed consultation on the Surrey Waste Plan, Preferred Options.

Question 1: My answer is NO

I do not support the emphasis on "making provision for treatment in other ways" because this would largely mean incineration. I do not support the use of thermal treatment in Surrey.

I believe Surrey should meet waste targets by minimisation, sorting, recycling, composting and other biological treatment. Energy could be generated from biogas produced during biological treatment rather than from burning waste as proposed. The greatly reduced amount of waste remaining after maximum recycling, composting and biological treatment should be sorted and pretreated to make it as benign as possible in landfill.

Given that 80% of our waste can potentially be recycled or composted, that over 60% of our waste is biodegradable and that the remainder would be ill-suited to burning, I do not believe incinerating waste meets Surrey's needs. I wish to avoid the emissions that are an inevitable part of even modern incinerators and find it unacceptable that incinerators produce toxic waste from the burning process itself that has to be disposed of in hazardous landfill sites.

I am anxious that Surrey's Waste Contract for two incinerators is skewing the Waste Plan towards favouring incineration even though DEFRA advises that contracts that are incompatible with modern waste targets should be reviewed and changed.

I support GAIN's proposal for a policy in the Plan to indicate that Surrey will be particularly interested in proposals that meet high environmental standards and employ non-thermal methods of waste treatment. I also consider the Plan should be geared to the Regional 60% recycling and composting target.

Question 2: My answer is NO

I do not support the first priority of identifying sites for waste facilities in industrial and urban areas because this could mean putting incinerators and other thermal treatment close to many residents. I would not support incineration in any of the proposed locations. Surrey is too densely populated to use thermal waste technologies or large facilities that make bad neighbours. I support a major improvement in Civic Amenity Sites, accessible to every urban area in Surrey.

Questions 3 and 4: My answer to both of these is NO

I do not support the second and third priorities for developing waste facilities in the countryside because they do not distinguish between different types of facility and different types of waste. Different waste collection and treatment facilities have different impacts. I would support closed vessel compost plants with gas capture accessible to major communities across Surrey.

Question 6:

I oppose any of the sites being "preferred" or "safeguarded" for "energy recovery/thermal treatment". I oppose Slyfield being one of only two "preferred" sites for major waste facilities in Surrey. The Sustainability Appraisal advises that there should be a larger number of smaller sites, which would reduce the burden on Slyfield. Slyfield cannot be expected to accommodate an overly large facility with all the traffic, landscape and pollution impacts this would involve. I am also anxious that the Plan could allow incineration at the sewage works at Slyfield and about the overall bias towards incineration in the Plan, which could result in proposals for incineration at Slyfield.

### **Statement of Community Involvement**

Please treat the following as a response to the Statement of Community Involvement Consultation and as comments on the way the consultation on the Waste Plan is being conducted.

I would like to register a formal complaint about the way in which the Waste Plan consultation is being conducted.

I think Surrey is muddling its planning and waste disposal roles.

I am very unhappy that there is no clear statement about incineration in the questionnaire. Previous waste consultations have disguised incineration as "recovery" and "energy from waste". Now it is being called "treatment in other ways". Surrey has a contract to build two incinerators, incineration is the Council's preferred option for residual waste and some very dubious weightings in the background reports favour incineration. The consultation should make it much clearer that if I support the approach of Surrey's Waste Plan I will be voting for incineration.

The Statement of Community Involvement should ensure the Waste Plan consultation delivers honest and transparent questions on the place of incineration in Surrey. It should also deliver answers to the 85,000 objections to incineration in Surrey. I feel Surrey is ignoring the concerns of many residents regarding its approach to waste. For example, it seems that the views expressed in over 1,500 responses to the pre-consultation are being largely ignored. A Statement of Community Involvement requires the Council to listen, and also to respond as to how the views of the community have been taken into account.

I am concerned that County Councillors are not being given the opportunity to enter into dialogue with the community and community groups over the approach to be taken to waste in Surrey. The Statement of Community Involvement should make provision for enabling our elected County Councillors to be more accessible to the community.

Yours faithfully,

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Response to Surrey's Rebuttal Letter:

Many residents wrote to Surrey expressing concerns about the way Surrey's Waste Plan consultation was being conducted. They thought the new "Statement of Community Involvement" should set high standards for dialogue with the public. There was therefore concern that Surrey was

- disguising incineration as "treatment in other ways",
- muddling its waste disposal and planning roles
- not committed to responding to views expressed by residents in consultations (for example, little account was taken of the views expressed by many thousands of residents that they wished to see provision for an incinerator-free option), and
- providing little opportunity for dialogue with Councillors on the waste issue.

Rather than taking account of residents' concerns, Surrey has issued a rebuttal which yet again appears dismissive of the issues raised.

I support the following observations on Surrey's response:

Question 2:

The concern that Surrey muddled its waste disposal and planning roles remains. The Waste Plan should not be driven by the facts that Surrey, as disposal authority, currently has a preference for incineration of residual waste and has a contract for two incinerators. The Waste Plan should be a framework for making waste decisions that can accommodate an evolving suite of contracts and changing targets and approaches to waste treatment. There is supposed to be a "Chinese Wall" between waste planning and waste disposal at Surrey and the public needs to be confident that the distinction between the two roles is always clear.

Question 3:

Yes, the consultation covers the whole plan. But the first consultation question asked whether people supported "treatment in other ways" without making it clear that the other way preferred by the Council is incineration. It was therefore not a transparent question. This follows other questionnaires, at other stages of the Waste Plan, where the word incineration has been avoided, for example by using the term "recovery". Anyone relying on the questionnaire to understand the question, would not have known they were being invited to support an approach involving incineration by agreeing with the Council's objectives in the first question. It is well known questions shape answers in questionnaires. There was ample scope to set out the key information on the question that most people saw.

If Surrey wants to reach new audiences, for example by asking consultation questions on beer mats, it needs to be able to frame fair questions.

Question 4:

The public perception is that 85,000 objections to incineration deserve more than the brief consideration given in the draft Waste Plan. The public has tirelessly responded to consultation after consultation and is troubled and disappointed that concerns expressed and suggestions made are insufficiently acknowledged. The commitment to feedback is welcome. However, there needs to be provision for dialogue, and adapting policy in the light of consultations and not just for rebutting public opinion.

Question 5:

Many residents have taken the trouble to tell the county they feel there are inadequate opportunities for dialogue with Councillors over important issues such as waste. It would be disappointing if this message was disregarded. Relying on Committee reports for dialogue with the community on such important matters does not address concerns.

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Surrey County Council Consultants,  
Dialogue By Design,  
Ambassador House,  
Brigstock Road,  
Thornton Heath,  
CR7 7JG

Dear Sir/ Madam,

**SURREY COUNTY COUNCIL CONSULTATION ON THE ISSUES AND OPTIONS PAPERS  
- A WASTE DEVELOPMENT FRAMEWORK FOR SURREY**

I would like my comments to be taken into account in Surrey's Waste Local Development Framework Consultation by means of this letter rather than by having to register to send my comments in online. You may treat my letter as a response to Issues Paper 4 Question 9 ("What modifications, if any would you like to see in Policy 5") for inclusion in the relevant comment box.

I am particularly concerned by the proposed policy 5 in Issues Paper 4 which says that thermal treatment (such as incinerators) will normally be permitted subject to some conditions.

I do not support the recommendation that it would be the best option for Surrey to incinerate waste, and possibly also waste pellets. I am very troubled that this recommendation is buried in background papers (A BPEO report produced by consultants used by Surrey Waste Management and which GAIN considers appears to change the weightings used to favour incineration).

We have had so many consultations on waste over the last few years. Each time there has been overwhelming public opposition in Surrey to incineration. There have now been over 80,000 objections to incineration in Surrey.

Many residents were heartened when Surrey's Districts and County offered us an incinerator free "option h". We were told it is feasible to deal with our waste without incineration. Surrey's lead Councillor, Andrew Crisp, gave interviews about avoiding incineration. Only a few weeks ago Surrey's new lead Councillor, David Davis, told a GAIN meeting that he did not believe we would have incinerators in Surrey, at least not for many years.

This makes it all the more bewildering that the Council has issued a statement saying incineration is its preferred option and is offering us a pro incinerator plan. It undermines the credibility of this consultation to tell us you intend to incinerate before you have heard our comments and in spite of all our unanswered concerns. I also think the Council should declare its preferred sites for incinerators as part of the consultation.

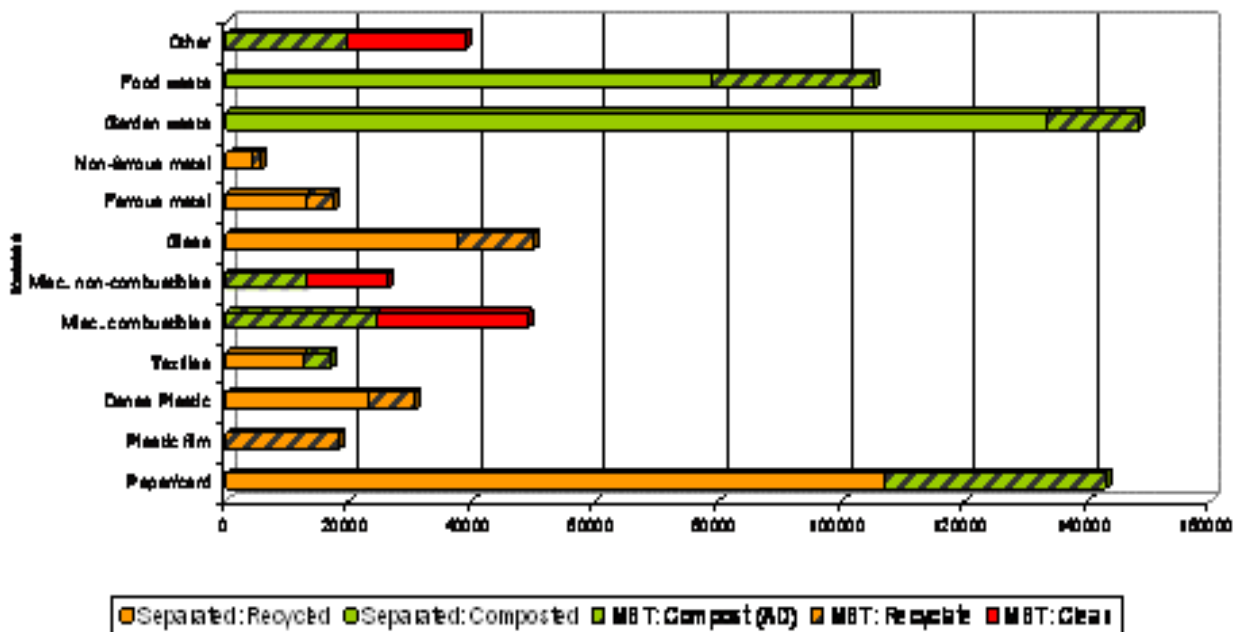
I remain opposed to incineration and to treatment that produces waste pellets for burning. I would like to support the feasible alternatives based on high recycling and composting with Anaerobic Digestion as part of Mechanical and Biological Treatment to reduce and make safe residual waste. I cannot support a Waste Framework that involves incineration and I am very disappointed that the Council does not appear to be listening to and working with residents who have worked so hard to try to make their views known in a constructive way.

Yours sincerely,

Appendix 5:

Composition of Surrey's Municipal Waste Matched to Treatment Option Types

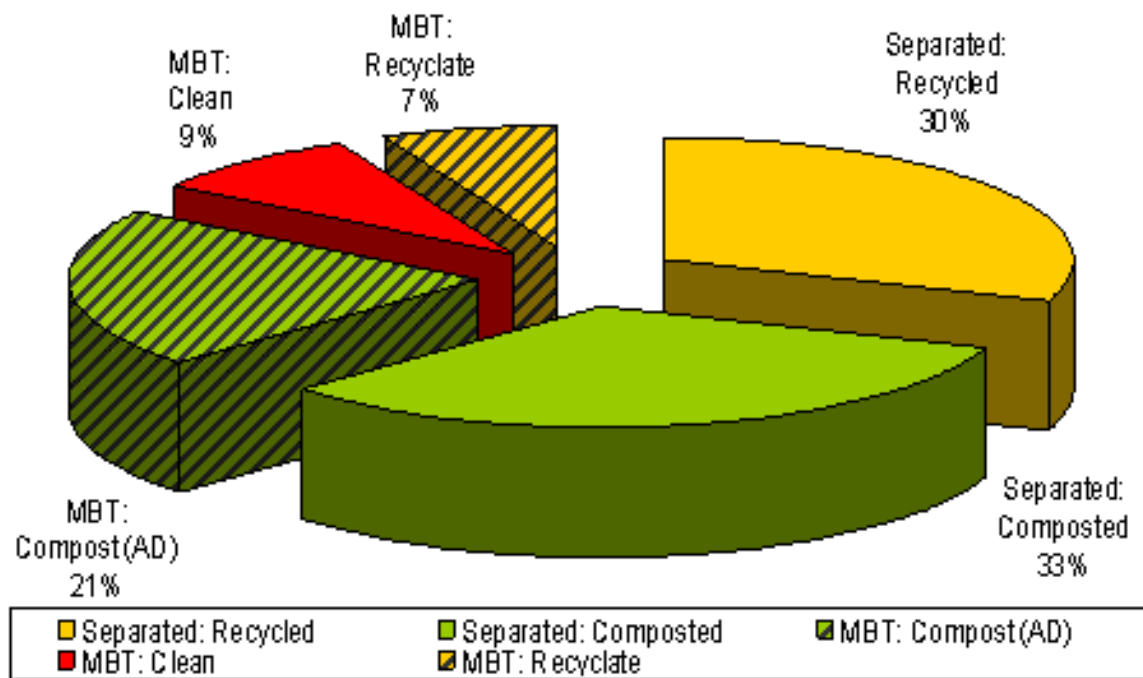
**Indicative Municipal Waste Scenario 2016-2030  
(Based on Composition in 2003)**



**Appendix 6:**

**Treatment Option Types Matched to the Composition  
of Surrey's Municipal Waste**

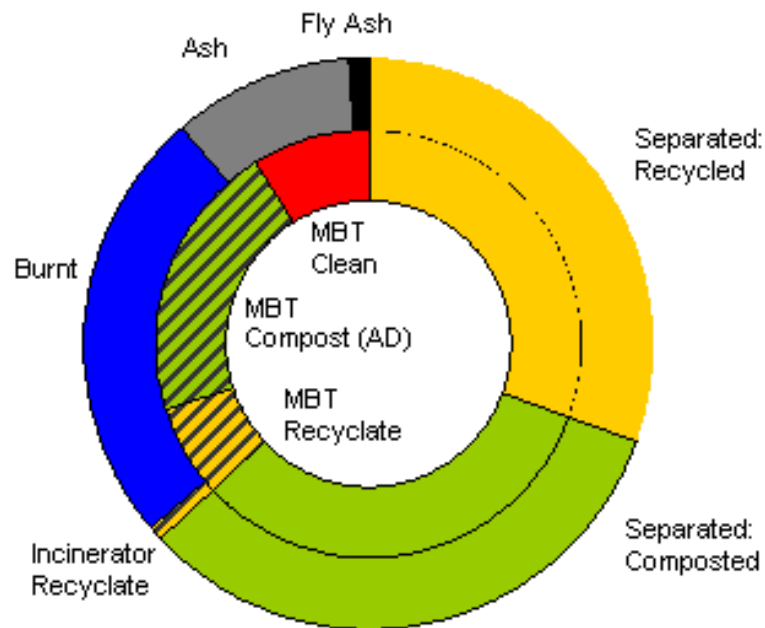
**Indicative Breakdown of Municipal Waste in Surrey  
2016-2030**



**Appendix 7:**

**Match between the Composition of Surrey's Municipal Waste and Treatment  
Non-Thermal MBT and Incineration Compared**

**Comparison of MBT and Incineration Strategies**



## Appendix 8

### UNANSWERED PROBLEMS WITH INCINERATION

- Even modern incinerators have a poor record on emissions
- Studies only look at ideal operating conditions at odds with reality
- NO<sub>2</sub> and NO<sub>x</sub> emissions tip Surrey above limits
- Hazardous landfill site needed in Surrey for toxic ash produced as result of burning process itself
- Waste drawn in from London
- Human body vulnerable to inhaled toxins
- 86,000 objections to incineration in Surrey
- Not well suited to Surrey's waste

## Appendix 9

### JMWMS RESPONSE BY GAIN JULY 2006

#### Summary of main points:

[1] GAIN supports the stated intention of SCC to achieve a 60% recycling and composting rate and wishes to see a concerted effort (including PFI investment) to achieve 50% by 2010/11 and 60% by 2016 not 2025.

[2] GAIN calls on Collection Authorities to work towards achieving 60% recycling and composting by 2016. To this end, GAIN calls for county-wide, kerbside collections of separated materials for recycling and composting, including most importantly food waste. (GAIN suggests that reducing the frequency of residual waste collection would meet less resistance if weekly collections of putrescible waste were available.)

[3] GAIN is pleased to see its suggestion that Civic Amenity Sites should be upgraded to Recycling Centres being taken forward. The importance of developing re-use on such sites should not be overlooked.

[4] GAIN attaches the greatest possible importance to the provision of facilities (especially at bring centres) for separating out potentially hazardous waste items such as batteries, old paint cans, treated wood and old household chemicals. It is vital to prevent such materials being mixed up in the general waste stream where they will cause pollution during mainstream waste treatment and contaminate any residues.

[5] GAIN welcomes the commitment in principle to produce premium compost from separated food and garden waste. GAIN calls for

- 200,000 tonnes of composting capacity (the tonnage currently proposed in draft Waste Disposal Plan would be inadequate to meet targets),
- all such processing to be "in-vessel" (be it aerobic or anaerobic),
- the gas to be captured and harnessed for energy and
- these facilities to be more dispersed around the county so that transport impacts are reduced and local communities can identify with and more readily use the energy from their neighbourhood facility

[6] GAIN suggests a target to level off residual waste at no more than 260,000 tonnes by 2016. After that GAIN advocates a modest 0.49% per annum reduction in waste generated per person for the next ten years. This does not seem unreasonable in a county that plans to be achieving a 60% recycling and composting rate. Defra has noted that the growth in household waste generated has slowed in recent years.

[7] GAIN would support an objective of ending all untreated, unsorted landfill in Surrey but suggests that the scope for cleaned, bio-stable landfill is not being recognized. It is noted that the South East Plan proposes 16% landfill by 2025 plus an extra landfill allowance for any residues from recycling, composting, biological breakdown or other recovery. Thus, a regional recovery target of 84% does not mean a landfill limit of 16%. The key thing is to ensure that any material sent to best practice landfill restoration has undergone cleaning and separation and is sufficiently bio-stable to avoid LATS penalties.

[8] GAIN welcomes the statement that some Surrey Local Authorities would prefer an incinerator-free approach to the treatment of residual waste and favour biological breakdown with gas capture. Over 1,600 letters have been submitted by residents during the JMWMS consultation supporting this position.

[9] GAIN is deeply shocked that, in spite of this (and by contrast with the 2003 JMWMS consultation), no worked up incinerator-free option has been offered to residents during the current public consultation on the JMWMS.

10 GAIN is extremely surprised that the assessment of treatment technologies by Entec, commissioned by the SLGA, did not even include an incinerator-free option that would meet recovery targets (by recovering energy from gas). An incinerator-free approach cannot come out as the good option if it is not even considered. As part of the SLGA assessment, 6 options involving burning waste were assessed. Of the 2 other options, one was unsorted landfill, which is obviously not an option. The other was Mechanical and Biological Treatment without capturing gas to meet recovery targets. Even though it was not properly worked up to maximize potential for recovery, it was a very promising option that has been wrongly dismissed.

11 GAIN notes that Surrey County Council's Environment and Economy Select Committee held an inquiry into waste management which overlapped with the JMWMS consultation period. The most notable issue to emerge from this inquiry was the number of times the scope for moving away from incineration, towards biological treatment, emerged as the direction for the future. The Inquiry and draft Waste Disposal Plan lack credibility because, in spite of this finding, a worked up incinerator-free option with energy recovery has not even been

assessed. Yet Surrey agreed its contract variation and reaffirmed its commitment to incineration while the inquiry was taking evidence from expert witnesses. These witnesses were given no indication that Surrey had negotiated capacity for up to 120,000 tonnes a year of Surrey's waste to be taken to Kent for Incineration for the next 10 years.

12 GAIN highlights the fact that opting for incineration in Surrey has now become a matter of choice. It is possible to meet targets using established and fully feasible incinerator-free technologies. The argument that Local Authorities recognize that incineration is unpopular but there is no alternative, cannot be sustained. If Councillors opt to tie Surrey to incineration for the next 20 years, they will be positively and avoidably choosing those two incinerators. They will also be making the prospect of applications in the county for two incinerators for Commercial and Industrial waste more likely, having sent a signal that burning waste is the preferred strategy in Surrey.

[13] GAIN advocates a strategy for residual waste based on

- mechanical processing
- biological breakdown with gas capture
- and cleaning of residue

The following box sets out the specification for this incinerator-free approach that GAIN calls on the SLGA to develop:

**Specification for Incinerator- Free Residual Waste Treatment: Hybrid MBT**

**Configuration: Mechanical Processing and Anaerobic Digestion with energy from gas with cleaned (possibly autoclaved) bio-stable residue to landfill**

- Good match with so called "residual" waste input, namely unseparated waste remaining after 60% recycling and compositing achieved from householder separated waste. (Refer to detailed MEL data)
- No combustion or RDF
- Minimized emissions to air and land (negative pressure, continuous process or emissions contained during clean out)
- High separation of pollutants
- High performance in terms of LATS (ie bio-stable output, reduced volume and weight)
- High separation of biodegradable elements to achieve best possible compost quality from mixed waste input
- Temperatures reached adequate to sterilize bio waste
- High separation of potential recyclates to optimize potential for recycling, including potential to recycle more elements over time
- Harnessing of heat and gas
- Capacity to process 130,000 tonnes of waste on one site

A great advantage of this hybrid MBT approach is that the treatment can be well matched to Surrey's waste composition and that, because it is modular, new processes can be added in over time to further enhance material recovery.

[14] GAIN submits that this hybrid MBT model would not only meet targets now but also offer great flexibility to accommodate changes in waste treatment that are bound to arise over the next 20 years.

Our approach would satisfy the following key tests:

- Acceptable Cost

- Clean Landfill
- LATS Compliant
- Meets Recovery Targets
- Residue Safety
- Proven Technology
- Flexibility
- Community Partnership

15 GAIN observes that the phrase “MBT is an intermediate technology whereas incineration is a final solution” is being used. This does not stand up to scrutiny with the MBT configuration GAIN advocates. Incineration is only final in that it burns materials irretrievably. Ash needs to be transported away. Under GAIN’s hybrid MBT option, more materials would be salvaged for recycling and carbon sequestered, outputs would be greatly reduced compared with inputs and bio-stable, and combustion pollutants would be avoided.

[16] GAIN stresses that If Surrey opts for an incinerator-free approach, it can work in partnership with residents to achieve progressively better recovery of materials from our waste and there will be flexibility to adapt to changing waste needs.

[17] GAIN is heartened that the Select Committee Inquiry refers to, and does not come up with any substantive objections to, GAIN’s suggestion that an incinerator-free MBT option with Anaerobic Digestion and gas capture is run through the Entec model. GAIN invites SLGA partners to develop this option using the Entec assessment framework and to encourage Surrey to participate. The Sustainability Appraisal for the draft Waste Plan includes an assessment of Anaerobic Digestion without incineration which fares well. This further supports pursuit of GAIN’s incinerator free option. GAIN also notes that the Select Committee inquiry could not reach full agreement for the recommendation that Surrey pursues incineration.

[18] GAIN draws attention to the fact that incineration has not fared particularly well in assessments prepared for Surrey’s various waste plans. In the BPEO assessment, the weighting for practicality had to be doubled in order to elevate the performance of incineration and even then, when errors in the figures were corrected, incineration was not the best option. The Sustainability Appraisal states that EfW incineration “is a relatively poor performer in terms of the likely impact on air quality and potentially also on biodiversity”.

19 GAIN is deeply concerned at the approach the Waste Disposal Authority is adopting towards consultation and calls on the Waste Collection Authorities to ensure community partnership and dialogue are achieved. We find it astounding that:

- The draft Waste Disposal Plan does not appear to have been open to influence by SLGA partners in that there has been no sign of any readiness to develop incinerator free options with energy recovery that several Local Authority partners have clearly been particularly interested in exploring.
- Rather than seeking to accommodate divergent views and explore win-win solutions, consent has been sought by the Disposal Authority from Defra to proceed with incineration regardless of disagreement by Local Authorities partners seeking to pursue an incinerator-free approach. (GAIN echoes the comments of many residents in thanking the Local Authorities that have questioned whether incineration is appropriate for Surrey’s waste needs.)
- A major contract variation that reaffirms Surrey’s intention to incinerate has been negotiated while the JMWMS is taking place and pre-empting the outcome of the JMWMS.
- The Waste Disposal Authority gave evidence to the Waste Inquiry to brief them on the JMWMS and made it very clear that it did not envisage any significant changes being made to the Waste Disposal Plan as a result of the public consultation. This makes it hard to have confidence that the Waste Disposal Authority intends to take full account of responses.

20 GAIN finds the way that Surrey has contracted for incinerator capacity at Allington in Kent wholly unacceptable. Exporting waste in this way could have been avoided if Surrey had managed the waste contract better since 1999 by delivering higher recycling rates from upgraded Civic Amenity sites, building composting facilities and developing appropriate infrastructure. GAIN does not accept the case for sending waste to Kent. GAIN’s proposed waste strategy aims for compliance without this. However, if Surrey does overcome the looming LATS penalties by exporting waste, any case for building incinerators rather than hybrid MBT plant in Surrey collapses. MBT would be far better matched to Surrey’s waste composition and to future needs.

[21] GAIN submits an alternative summary matrix of the Waste Disposal Action Plan, with proposed amendments in red, and hopes that the SLGA will find this helpful in developing an incinerator-free waste strategy for Surrey.

## Appendix 10

### Comments by GAIN on the BPEO Report:

The Assessment has continued to inform other assessments undertaken for the Plan

#### Waste Composition:

Surrey has excellent data on the composition of its waste. However there has been no matching between waste treatments proposed and the composition of the waste. The fact that 62% of Surrey's municipal waste is biodegradable is drawn upon to propose that composting and biological treatment alone will not deal with the county's waste. This misses the point that it is biodegradable, rather than all waste, that it is so important to divert from landfill. Landfill may be a good option for certain non- biodegradable, non-reactive waste. Conversely, the wisdom of burning biodegradable waste, from which material could have been recovered and biogas captured, is not considered an issue in the report when incineration is proposed.

#### Selection of technology options:

Option H, which was an incinerator-free option favoured in joint consultation by Districts and the County in the insital phase of the JMWS is ignored and not related to the options developed.

Closed Vessel Compost plants are not considered. There is a reference to 11 compost facilities under all options. Insufficient account is taken of the potential for gas capture under biological processes.

#### Impacts of options:

##### Emissions to air are considered under three headings:

- air acidification
- greenhouse gas emissions
- health effects

If the scores of these three impacts are combined, emissions to air can be seen as the biggest concern. If these three impacts are considered together, rather than separately, then a ranking of the technologies emerges based on the impacts of greatest concern. Anaerobic digestion fares well and incineration badly on health effects.

##### Air acidification:

SO2 emissions are used as a proxy for all acidifying gases. Yet NO2 emissions have been by far and away the biggest concern when considering the impacts of waste plant in Surrey because the county already has high levels for this pollutant in many areas. Previously proposed incinerators would have had significant impacts on NO2 levels. NO2 emissions would be a much more appropriate proxy. Incinerators do not fare particularly well with respect to NO2 and it will be important to assess how this compares with other waste technologies.

##### Real data:

The impact assessments are based on ideal/ normal operating conditions. It is crucial when considering the impacts of waste technologies, and in particular thermal treatment processes, that realistically achievable emission data is used. Waste can be a very variable fuel and process efficiencies fluctuate greatly. Impact assessments based on theoretically achievable outputs are not relevant. It is emissions and other impacts achieved in practice when operating waste plant that are relevant.

##### Ash impacts:

It is assumed that incinerator bottom ash will be recycled. This has not been achieved to date.

##### Compost impacts:

When considering the impacts of composting the reduced impacts of closed vessel systems and gas capture are not considered.

##### Landfill impacts:

The greatly reduced impacts of non- biodegradable, non- reactive landfill are not considered.

##### Valued performance data:

It is of interest that the incineration option fares badly in relation to health impacts, landtake, extent of public involvement, reliability of delivery and waste hierarchy ranking.

##### Weightings Consultation:

The consultation arrangements for establishing the weightings require further clarification. Only two organizations commented on the Strategic Environmental Assessment. Who decided the weightings? Was any account taken of community concerns?

Weightings:

The score for reliability of delivery appears to be increased from a value of 0 to a value of 0.1285 by multiplying 0 by a weighting of 0.129. (Elsewhere in the table a zero multiplied by a weighting is zero.) If the “weighted valued performance” for reliability of delivery of option 1 (table 3.31) is zero, the ranking of incineration is very different.

**Practicality vs Environmental Criteria:**

This is a curious section in which the weightings agreed at a workshop are overridden and the weighting given to practicality (cost plus reliability of delivery) is arbitrarily doubled to 44%? At this level it is claimed that incineration (rather than MBT to produce pellets) becomes the best option. Yet if the reliability of delivery figure should be 0 for incineration, doubling the weighting does not have the same effect.

**Landtake;**

To conduct a sensitivity analysis on the criterion considered to be the least significant seems curious. It is noted that excluding the land requirements of landfill associated with incineration elevates this option to rank second.

