

Surrey Waste Plan

Topic Paper 4 Errata and Minor Changes

Comments by GAIN - Respondent Number 212

GAIN accepts that some of the changes proposed are minor. However, it submits that others are not. GAIN considers that those relating to impacts on Habitats Directive Sites, consideration of Flood Risk in site selection and identification of sites for Hazardous Waste Management are all significant matters with potentially fundamental implications for the Plan as a whole.

Rather than replying to each proposed change individually, GAIN is responding thematically on the proposed changes relating to these three significant topics.

Impact on Habitats Directive Sites:

GAIN has consistently, since 2000, advised Surrey that impact on Habitats Directive Sites should be taken into account in the selection of waste technology and of sites in Surrey. In particular, GAIN has expressed concern at the wisdom of adopting technologies that could have adverse impacts on air quality and in turn on the habitat of internationally protected species. This concern was raised as an issue by the first Sustainability Appraisal which was replaced by Surrey.

GAIN submits that it would not be sound to leave it to an Appropriate Assessment at the Project Level to assess the air emissions and noise from a thermal treatment proposal. GAIN considers that this issue needs to be addressed at the more strategic Plan Level. This is because the Plan has been prepared in anticipation that several sites will be developed for incineration. If it were established on a site by site basis that incineration would have an unacceptable impact on Habitats Directive sites, it is not clear that the Plan minus these sites would provide an adequate strategy for enabling an appropriate waste infrastructure to meet Surrey's waste treatment needs.

It is noted that the Executive of Surrey is to consider removing a significant number of sites from the list of sites previously identified under policy WD5 as suitable for incineration as a result of new advice on the potential impact on Habitats Directive sites. This confirms and reinforces GAIN's concern that it is not sound to prepare a plan which purports to be technology neutral yet in practice assumes that applications will be submitted for the "preferred technology" of incineration. There are sound reasons associated with air quality and impact on Habitats Directive Sites, for saying that the Plan should encourage non combustion technologies where these would be more appropriate in Surrey. To be sound, the Plan needs to establish whether the identified sites provide an appropriate mix of locations and site sizes for a less incinerator-reliant strategy. It is far from clear that they do.

Sites Subject to Flood Risk

GAIN does not consider it to be sound to rely in a Plan on sites that are subject to flood risk. Again GAIN considers this to be a matter to be addressed at the more strategic Plan level not left to the site assessment level. Surrey has been advised that this is an issue for its Waste Plan since 2000. Whilst PPS25 has only recently been issued, the significance of this issue for Surrey's Waste Plan sites has been manifest from the outset of the consultation process. Given the potential impact of flooding on such strategic waste sites, and the risks and consequences of flood events of various magnitudes, GAIN considers more rigorous flood risk assessment to be required before any potential waste site in the flood plain is listed. When waste sites have flooded, pollution impacts have been significant. There is also the consideration of disruption to essential services. Mitigation may not be an adequate response. In some cases, increasing flood risk may make earmarking a site for waste use at all unwise.

Identification of Hazardous Waste Sites

GAIN does not accept that "Sites suitable for managing non-hazardous waste would also generally be suitable for facilities for hazardous waste management, as the land use implications are similar". It is not clear what assessment has been undertaken in order to substantiate this. A reason for separating out hazardous waste, in planning and regulation, has been to give greater recognition to the need to take greater care in the handling of hazardous materials. At some of Surrey's existing waste sites, the way in which materials which are now classified as hazardous are handled has left much to be desired. A careful assessment needs to be undertaken to establish whether both existing and new sites are well suited to handling hazardous material. Containment of spills, seepage into ground water and escape of dust into the air are examples of issues needing to be addressed. Proximity of water courses, proximity to residents, the probability and consequences of a flood and the nature of surface/lining material are factors that will affect any risk assessment. It would not be sound to work on the assumption that planning for hazardous waste sites is no different from planning for non hazardous waste.

Public confidence is an important factor. Eleventh hour changes, such as this, undermine public confidence and understanding. There is a desire to locate some appropriate waste facilities, such as in-vessel compost facilities, close to centres of population. If there is a perception that once a site is used for garden or food waste, it could be used for hazardous waste too, this will increase public resistance to any type of waste facility close to communities.

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