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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 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.

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