



OFFICER REPORT TO EXECUTIVE

**THE SURREY WASTE PLAN
THE PREFERRED PLAN 2005**

27 SEPTEMBER 2005

KEY ISSUE/DECISION:

The preferred options for the Surrey Waste Plan have been prepared, together with supporting documents.

The Executive is asked to approve the policies and proposals of the plan, including the selection of sites, as preferred options of the council and agree to a formal public consultation (proposed for the six-week period 31 October to 11 December 2005).

BUSINESS CASE:

- 1 In June 2003, the Executive agreed to recommence the preparation of a Waste Plan to include sites for waste management facilities and making use of outside consultants.
- 2 During 2004 changes to the planning system were brought in by the Planning and Compulsory Purchase Act 2004. Plans are now required to be in the form of a suite of documents, which can be prepared and reviewed at various times, and which together make up a local development framework. The Council agreed a Local Development Scheme which set out the documents making up the Surrey Minerals and Waste Local Development Framework, and the timetable for their preparation. That Scheme has been approved by the Secretary of State, and cannot be varied without his consent. The Scheme came into effect in April 2005.
- 3 Thus, the preparation of the plan is a statutory requirement, to a fixed timetable. However, the plan is urgently required because of the need to provide waste management facilities in Surrey, for all types of waste, and move away from the reliance on landfill.
- 4 An informal 'Issues and options' consultation was held from November 2004 until end of February 2005. There were also subsequent informal consultations on the assessment of additional sites. The next formal stage in the process is for the Council to consult on its preferred options prior to preparation of the final documents for submission to the Secretary of State. This is what is now proposed.

THE SURREY WASTE PLAN

- 5 Four Waste Development Documents have been prepared:
- The Core Strategy
 - Waste Development (including site specific proposals)
 - Waste Development Control Policies
 - Proposals Maps
- 6 Between them they cover the majority of policies and proposals for waste (a later document on the particular requirements for processing construction and demolition waste will be prepared alongside minerals development documents). For convenience, these four have been put together within a single document, with supporting material, and called the Surrey Waste Plan – Preferred Plan 2005. It is proposed that the plan as a whole sets out the preferred options of the Council, with an appendix which discusses the choice of options.
- 7 The consultation is proposed for 31 October to 11 December. It is a statutory period of six weeks, although copies will be sent out in advance to assist consultees and a workshop with key stakeholders is arranged in October to facilitate their involvement.
- 8 The Surrey Waste Plan provides for the sustainable management of Surrey's waste to achieve net self sufficiency. This includes reducing provision for London's residual waste. Under the new legislation this is a spatial plan as opposed to a narrower land-use plan, which allows the consideration of a wider range of policies. In particular it contains policies related to supporting wider objectives of waste minimisation and recycling.
- 9 Central to the plan is the concept of the waste hierarchy. Waste should be managed as high up the hierarchy as possible: at the top by reducing its creation, then reusing it, then recycling and composting, then energy recovery and finally at the bottom of the hierarchy, disposal (generally landfill). However, it recognised that not all waste can be dealt with towards the top of the hierarchy and all levels of processing and appropriate technologies need to be provided for.
- 10 For the avoidance of doubt, it is not for the Waste Planning Authority to propose any particular form of waste treatment. It is for others to bring forward specific proposals. Rather, the WPA must make reasonable provision for policies and sites to support the waste hierarchy and to enable proposals coming forward to be assessed in an appropriate planning context.
- 11 The plan identifies sites based on detailed assessment of the most suitable sites in Surrey, but also provides a policy framework for the assessment of other sites that may come forward during the plan period. The current Surrey Waste Local Plan 1997, which this new plan will replace, was criticised by the Inspector for not including sites, so it has been important to address that issue.

THE PREPARATION OF THE PLAN

- 12 Most of the technical work for the plan has been undertaken by independent consultants, some of which has already been published. Key reports are an Assessment of Need by Babtie Group, a Sustainability Appraisal Report and a Site Assessment Report prepared by ERM.
- 13 The Sustainability Appraisal Report incorporates the requirements for a Strategic Environmental Assessment. It tests the Plan against a series of criteria that reflect relevant sustainable development policy objectives. The Plan and its alternatives were tested to enable the identification of a preferred option in the light of the knowledge of the potential impacts on relevant sustainable development policy objectives.
- 14 The consultation on Issues and Options has been carried by Dialogue by Design. Technical work to assess the availability of landfill sites has also been the subject of an informal consultation.
- 15 The summary of the results of the Issues and Options consultations and the response to those results by ERM/SCC are available in four volumes and a copy is available in the Members' Reading Room with a set of the supporting documents. These and all the technical reports are also available on the County Council's web site. A summary of the main issues arising from the consultations is set out in **ANNEX A**.
- 16 ERM undertook the initial drafting of the Surrey Waste Plan, taking account of the technical reports, the result of the consultations, and the Sustainability Appraisal. However, the drafting has since been taken over by officers who have produced the current preferred option. Many of the changes are stylistic and for clarification, but substantial changes have been made to reflect:
- Changes to national and regional planning guidance which took place after the initial drafting by ERM
 - Consideration of Green Belt issues not adequately covered by ERM
 - Additional information on specific sites, notably an additional report on visual impact commissioned from Bell Fischer and further consideration of traffic issues
 - The legal requirements of the documents,

These changes are considered below.

THE DEVELOPMENT OF THE CORE STRATEGY

- 17 In July 2005 the Government published revisions to the Waste Strategy 2000 and Planning Policy Statement 10: Planning for Sustainable Waste Management. That was issued in July 2005 and has now been incorporated in the waste plan. Much of this is a reiteration of the central importance of the Waste Hierarchy and sustainability principles around which the Core Strategy was originally drafted by ERM,
- 18 However, a major change is the abandonment of the Best Practicable Environmental (BPEO) concept which, in future, should be subsumed into the Sustainability Appraisal process. The proximity principle is no longer used as a term in the Waste Strategy or PPS 10 and instead the guidance reiterates

the European Waste Framework Directive which means enabling waste to be disposed of, 'in one of the nearest appropriate installations' and also a more general requirement to meet the needs of communities. The objectives and principles of the Waste Strategy are set out in paragraph A15 of the Surrey Waste Plan and members are advised to give substantial weight to these objectives and principles.

- 19 The approach to Green Belt has also been reconsidered. PPS10 states, 'protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and in determining planning applications, that these locational needs...are material considerations that should be given significant weight'.
- 20 The Proposed Modifications to the Regional Waste Strategy have also just been published for consultation and when this is finalised it will be incorporated into the South East Plan and form part of the development plan that needs to be considered alongside the Waste Plan when considering planning applications, eventually replacing the Surrey Structure Plan. The Proposed Modifications require authorities to plan for net self-sufficiency through provision for management capacity equivalent to the amount of waste arising and requiring management within their boundaries. Where appropriate they should also provide capacity for waste from London and from adjoining sub-regions. However provision for London should only be made where there is a proven need with demonstrable benefits to the region.
- 21 The approach in the Regional Waste Strategy to Green Belt suggests that waste management facilities should not be precluded from the Green Belt where this is consistent with the proximity principle, where there are no alternative sites and provided that the development would not cause harm to the objectives of the designation. This wording is still subject to consultation and may need to be adapted to reflect PPS10 (for example, the reference to the proximity principle appears incompatible with PPS10). The final version will be published in time to be incorporated into the next stage of the Waste Plan.
- 22 The drafting of the Waste Plan has reflected the national policy and the draft regional waste strategy by subsuming the BPEO assessment into the Sustainability Appraisal, which has also been carried out by the consultants ERM to cover Strategic Environmental Assessment requirements.
- 23 The locational strategy of the plan also reflects the final version of PPS10 and does not rely on the proximity principle. However, the strategy also reflects the limited choice of sites in Surrey, and the limitations imposed by Green Belt policy.
- 24 Government and regional policy on Green Belt recognises the need to make provision in the Green Belt, but does not remove the need to test for very special circumstances before development is permitted. It is therefore not possible to put forward preferred sites in the Green Belt, but to identify sites in the Green Belt which should be safeguarded for a waste use and define the factors which could constitute very special circumstances. This approach has been supported by counsel's opinion.

THE SELECTION OF SITES

- 25 The Executive should specifically note the detailed reasons for selecting particular sites set out in the report entitled 'Evaluation of Site Options'. ERM previously undertook a detailed assessment of 47 possible sites. Many were rejected as unsuitable by ERM. Others have been ruled out because there is no reasonable prospect of them being available. It must be recognised, however, that the availability of sites will change over time, and is one of the reasons why the list of sites needs to be as wide as possible, and even then the possibility of other sites coming forward cannot be excluded. Even so there are probably only just enough sites to meet the identified need for all waste streams, although industrial estates are listed where the Plan policies encourage waste development.
- 26 For the reasons given in paragraph 24 sites within the Green Belt have also been treated differently. This leaves only one site within urban areas, at Slyfield, Guildford, and one site in the countryside but not in the Green Belt, at Clockhouse Brickworks, Capel. All other sites identified are in the Green Belt.
- 27 The most difficult choices are over those sites which may be suitable for thermal treatment facilities. Thermal treatment includes forms of incineration and other forms of treatment such as pyrolysis and gasification. On a commercial scale they all require large buildings with a substantial flue or chimney.
- 28 ERM recommended that six sites were suitable for thermal treatment as follows:
- Clockhouse Brickworks, Capel
 - Slyfield Industrial Estate-land to the north east
 - Copyhold Works, Redhill
 - Randalls Road, Leatherhead
 - Martyrs Lane, Woking
 - Heather Farm, Horsell (subject to further assessment)
- 29 The recommendations in respect of Clockhouse Works are supported. However, in respect of Slyfield, a subsequent study of visual impact by Bell Fisher, consultants, suggests that thermal treatment facilities would have a substantial impact. Also, Guildford Borough Council have written to the County Council informing them that as owners of the site they would be opposed to any form of thermal treatment on the site. PPS10 advises authorities to avoid unrealistic assumptions on the prospects for the development of waste facilities having regard to any ownership constraint. However, Slyfield remains a suitable site for a range of other waste facilities. The Copyhold site has also been excluded. Officers consider that ERM have not taken sufficient account of visual impact and traffic, and this has been confirmed by the work of Bell Fisher on visual impact. Nevertheless, it remains a site which may be suitable for other waste uses.
- 30 The Clockhouse works at Capel is therefore the only site which is firmly proposed for thermal treatment. A very limited number of other sites may be required and therefore officers have identified which sites in the Green Belt may be suitable, subject to very special circumstance being demonstrated. These sites are proposed to be safeguarded. These are:

- Charlton Lane, Shepperton
 - Martyrs Lane, Woking
 - Randalls Road, Leatherhead
 - Land adjacent to Trumps Farm, Longcross
 - Land at former airfield, Wisley
- 31 Officers have put forward three sites initially not recommended by consultants for thermal treatment, at Charlton Lane, Shepperton, land adjoining Trumps Farm, Longcross and land at the former Wisley Airfield. Consultants consider that Charlton Lane has several suitable features but are concerned that the visual impact could not be adequately mitigated. The land is flat and with limited tree cover, hence the identification of a possible impact over a relatively wide area. On the other hand, almost all of the residential areas which may be affected are at some distance and it is difficult to assess the impact, particularly in the absence of an actual proposal. Hence, officers propose to include the site in the plan but with the caveat that planning applications must pay particular attention to visual impact.
- 32 On Wisley Airfield and land adjacent to Trumps Farm, ERM consider that these sites are suitable for waste development, but not for a thermal treatment facility. At Trumps Farm, ERM consider the local road network to be poor, but officers disagree. At Wisley Airfield, ERM's view is based in the visual impact within a rural area of the Green Belt. Officers accept that visual impact is an issue, as it is at Randalls Road. However large-scale development would impinge on relatively few houses at both Wisley and Randalls Road. Therefore officers consider these sites should be identified as potentially suitable for thermal treatment facility, albeit with a strong caveat on the need for satisfactory mitigation of the visual impact at Wisley and Randalls Road.
- 33 The result of these changes is one preferred site, and five sites safeguarded in the Green Belt. Officers judge that this gives a reasonable balance between ensuring a choice of sites, given the uncertainties about what proposals for development might come forward, and the need for all sites to be tested through the planning application process, set against the need to avoid unnecessary public concern if too many sites were included. Officers have also reviewed all of the other sites considered by consultants which were rejected as suitable for thermal treatment. Officers agree with the judgement of the consultants and do not consider any other sites are as suitable as those put forward above.
- 34 The suitability of a site at Heather Farm, Woking for thermal treatment is still under consideration. Woking Borough Council have proposed that the site may be suitable but technical work, particularly on visual impact, is not yet complete. This position is reflected in the plan.
- 35 ERM, and a sub-contractor, assessed 34 mineral working voids as to their suitability for potential non-hazardous landfilling. None of the sites were assessed as showing potential for waste disposal within the period of the Plan up to 2016. These assessments may have to be revisited, either in the submission phase of this Plan, or future reviews of the Plan.

THE ALTERNATIVE OPTIONS

- 36 The attention of the Executive is specifically drawn to APPENDIX 1 of the waste plan, which sets out consideration of the possible alternative options to that put forward in the plan.
- 37 The choices available are very limited. The general approach and strategy reflects government policy and there would have to be overwhelming reasons for taking a different approach. Some representations from the public have suggested that particular technologies, such as energy from waste facilities, should be ruled out. National policy encourages efforts to treat waste towards the top of the waste hierarchy but there may be a need for residual waste to be treated by thermal treatment if landfill is to be avoided.
- 38 Locational choices are very much prescribed by the lack of suitable sites, and established planning policies such as the Green Belt. Some representations have emphasised the need for a spread of smaller facilities, directly serving local communities. However, while that has the benefit of emphasising the connection between waste arisings and waste disposal it is not practicable, the sites are not available and the environmental, planning and traffic impacts would not be any less than a fewer number of larger facilities.

FINANCIAL IMPLICATIONS

- 39 The County Council is committed to a timetable for production of the Waste Plan through the Minerals and Waste Development Plan Scheme and it could lose some Planning Delivery Grant through not meeting its milestones.

EQUALITIES IMPLICATIONS

- 40 No implications.

RISK MANAGEMENT

- 41 The County Council is required to produce an Annual Monitoring Report detailing progress against its milestones in terms of the scheme.

RECOMMENDATIONS:

- A) That the waste development documents in the Surrey Waste Plan - Preferred Plan 2005 be approved as the preferred options for the purposes of public consultation, along with supporting documents.
- B) That authority be delegated to the Head of Planning and Countryside to make any amendments following Executive consideration and minor amendments in consultation with the Executive Member for the Environment.

REASONS FOR RECOMMENDATIONS:

- A) To provide formally for public views to be taken into account in the preparation of the Surrey Waste Plan.
- B) To ensure Members' views can be appropriately accommodated.

WHAT HAPPENS NEXT:

A six week statutory consultation will commence on 31 October. Following this a final version of the waste development documents in the Surrey Waste Plan will be prepared. Subject to approval by the Council this will be submitted next year to the Government Office. The Secretary of State will hold an independent Public Examination before an inspector, scheduled for February 2007. Final adoption of the plan is scheduled for September 2007. The waste development documents in the Plan will form part of the Minerals and Waste Development Framework for Surrey.

Responsible: Hilary Herbert, Head of Minerals & Waste, Tel: 020 8541 9431

Accountable: Roger Hargreaves Head of Planning and Countryside Service

Consulted: Environment and Economy Select Committee
Executive Member Reference Group

Informed: Surrey County Council Members (Seminar on 19 September 2005)

Supporting documents

Sustainability Appraisal report, ERM August 2005

Site Assessment Reports, 1, 2 and 3, ERM 2004 and 2005

Review of Landscape and Visual Impact Study – Bell Fischer August 2005

Summary report of consultation on Issues Papers 1-4, Dialogue by Design 2005
ERM/SCC response to consultation responses on Issues Papers 1-4

Summary report of Consultation on Site Assessment report 2D -Dialogue by Design
September 2005.

SCC Evaluation of site options - September 2005

Other background papers

Draft Surrey Waste Plan, ERM August 2005
Statement of Community Involvement September 2005

Surrey Waste Local Plan 1997

Assessment of Need for Waste Disposal and Management Facilities in Surrey, Babbie Group, 2003
