

6. Comments

- 6.1** *The Plan fails to identify the amount of waste related development required to provide for the County's needs over the Plan period. Clearly, the capacity of different facilities will vary, as it will with a range of processes. Only two sites are suggested as preferred options, but it is not clear whether, if they both come forward, this will satisfy the overall need for the County, or whether other sites would also be required. This leads to a fundamental ambiguity in terms of capacity and what this means for sites to come forward.*
- 6.2** *The Plan seems to over-emphasise thermal treatment and incineration. Indeed, this is the County's preferred option. This is an approach which is contrary to the principles of the Integrated Waste Management Strategy adopted by the SLGA.*
- 6.3** *Whilst it remains to be seen whether incineration is the most "practicable, financially viable and sustainable approach", its preference would be likely to reduce the likelihood of other forms of treatment to come forward. It is therefore recommended that incineration merely be set alongside other forms of treatment to be considered on its own merits. Whatever the technical merits, it remains a fact that public acceptance of incineration remains a problem, and could be an overriding barrier to development of waste treatment facilities locally.*
- 6.4** *Whilst incineration is promoted, there is no reference as to how the hazardous waste which remains at the end of this process, is to be disposed of. The Plan states that there are currently no facilities for hazardous waste disposal in the County. This issue should be specifically addressed in the documents*
- 6.5** *There will still be a need for some landfill capacity in the County, both prior to facilities being made available and also to deal with residual waste after treatment. The documents make no reference as to where this will be, what capacity will be required, nor what is available, either currently, or in the future.*
- 6.6** *Given the previous pollution and odour difficulties with the former green composting facility at Lyne Lane, Lyne, the policy that only limited scale open windrow composting or in-vessel or within building composting would be promoted, is welcomed.*
- 6.7** *Whilst the document suggests that very special circumstances will need to be demonstrated before Green Belt sites come forward (in accordance with Planning Policy Guidance Note 2 : Green Belts) many of the identified sites do lie within the Green Belt. A number of industrial and urban sites are identified, but much of the urban area is dismissed as not being available or too expensive due to competing uses. It is considered that the document is too ready to identify Green Belt sites, and an objection should be made to what is tantamount to promotion of inappropriate development, which by definition is harmful to the Green Belt and should be refused without very special circumstances.*
- 6.8** *Equally, it is not considered acceptable that a policy should identify very special circumstances (Policy CS6). Effectively this is seeking to make inappropriate development appropriate, which is contrary to*

national policy. Very special circumstances will have to be identified on an individual site basis as any planning application for waste related development comes forward.

- 6.9 There is ambiguity over the term 'safeguarded' sites. Given that they are within the Green Belt, they are unlikely to be used for any other inappropriate development. If they are 'preferred' sites, they should be described as such.**
- 6.10 The document states that site availability is a key factor in terms of delivery. However, it is not stated in relation to each site as to if and when it is available. Equally, it is not clear to what extent sites have been identified/safeguarded on the basis of their availability rather than environmental merit.**

Sites in Runnymede

- 6.11 Two 'safeguarded' sites are identified, the first being the former compost site in Lyne Lane, Lyne. This is safeguarded for limited scale waste development, excluding thermal treatment, subject to demonstration of very special circumstances.**
- 6.12 This site was previously used for open windrow composting, including the provision of a large building on the road frontage, although the site has now been restored to open land. The open windrow composting caused a significant nuisance to local residents as a result of odours from the site to the extent that the Environment Agency had prosecuted the operator of the site.**
- 6.13 The "Evaluation of Site Options" carried out on behalf of Surrey County Council in September 2005 recognised concerns about the potential visual impact of waste development on this high level land. It confirmed that any development would have to be relatively low level and be able to justify the very special circumstances for development in the Green Belt.**
- 6.14 In responding to the earlier issues and options consultation in January 2005, this Committee agreed the following comment in relation to this site:**

"The green composting site use has now ceased and is in the process of being restored, and the temporary planning permission shortly will expire. To describe it as having an established waste use is therefore overstated. Nevertheless, its past history as a waste facility has to be acknowledged and its location, central within the Borough, would accord with the proximity principle in relation to the three main Runnymede settlements. Clearly, as a Green Belt site it would have to be demonstrated that other urban or less harmful Green Belt sites were not available, and there would be a need to fully assess the environmental impact of any new facility (to ensure that past problems and nuisances from use of the site are not repeated). However, subject to this, the use of the site might be accepted as the Best Practicable Environmental option in the Borough, should it satisfy the SA/SEA requirements".

It is recommended that these same comments be forwarded to Surrey County Council.

- 6.15 The second 'safeguarded' site is land adjacent to Trumps Farm, Longcross. It is identified potentially for waste development, including**

thermal treatment. The County's consultants document 'Evaluation of Site Options' September 2005 concludes:

"As well screened, previously developed and available land, this site is considered appropriate for waste related development".

- 6.16 The consultant concluded that thermal treatment should be excluded from the list of appropriate (sic) uses for the site due to the poor road network locally. However, Surrey County Council disagrees as it does not regard the local road network as poor.**
- 6.17 This site was previously used for motorway construction and maintenance. It is not considered that such temporary uses of land can be used to justify permanent, inappropriate development. Whilst the site is in some need of restoration, it is not visually prominent, and is well screened and could easily be restored to an attractive landscape.**
- 6.18 It lies adjacent to the Trumps Farm Site where landraising has taken place creating an alien landform. Land to the south has been identified for potential mineral extraction and the nearby former DERA site is likely to be redeveloped in the future. Rather than promote further development, the land should be retained as open, to help separate Virginia Water which lies to the north.**
- 6.19 A Landscape and Visual Impact Study carried out by consultants on behalf of Surrey County Council in 1995 and up-dated in 2005 looked at this site's capacity to provide large scale thermal treatment facilities. These were described as having a building footprint of 120m x 60m, a building height of 25-30m and a stack height of 60-80m.**
- 6.20 Given the proximity of residential development some 150 metres north of the site, and the Chobham Common Special Protection Area some 1.5km west of the site, such a development would have an unacceptable adverse impact on amenity in the area.**
- 6.21 Whilst the County Council obviously disagrees with its own consultants, the site could not possibly be described as 'well served by the strategic road network'. Access is via Windlesham to the west, Virginia Water to the east, and Longcross to the south. All of these routes are through rural, residential areas. It is recommended that strong objection be raised to the inclusion of this as a 'safeguarded' site.**
- 6.22 The Council reminds Surrey County Council (SCC) that as a result of the recent ECJ ruling dated 20 October 2005 in Case C-6/04 in respect of the application of the Directive 92/43/EEC - Conservation of natural habitats - wild fauna and flora, in the Conservation (Natural Habitats, & c.) Regulations 1994 (HR94) the impacts of SCC Waste Plan need to be assessed. In order to comply with Regulation 48 of the HR94, SCC will have to formally conclude that SCC Waste Plan as proposed will not adversely affect the integrity of any European sites either alone or in combination with other plans or programmes. This conclusion will also afford conformity with Runnymede's LDF Policies NE16, NE17, NE18 and NE20 and SCC SE5 and SE6.**

Summary of Representations

<u>Reference/Policy</u>	<u>Comment</u>
Spatial Strategy/Strategy Objectives	Objection is raised to the emphasis on incineration as a preferred approach. This is contrary to the principles agreed under the SLGA Integrated Waste Management Strategy which confirms that mass burn incineration should be avoided.
Policy CS5: Location of Waste Facilities	Objection is raised to this. It should make clear that waste related development is inappropriate development in the Green Belt and can only be permitted where very special circumstances are demonstrated.
Policy CS6 : Green Belt	Objection is raised to this. It is unacceptable for a policy to confirm what will constitute very special circumstances and is tantamount to suggesting appropriateness. The policy should be deleted.
Policy WD2: Recycling, storage, Transfer materials, recovery and processing facilities (excluding Thermal treatment WD5: Thermal Treatment Facilities and Policy DC1: Safeguarding Sites	Objection is raised to this. It is not confirmed what the sites are being 'safeguarded' against, nor is it clear whether these are preferred sites. This ambiguity needs to be addressed. The inclusion of land adjacent to Trumps Farm, Longcross would be contrary to Policies CS5, CS6, DC2 and DC3 and it should be deleted.
Policy WD7 : Disposal by Landfilling, Landraising or other engineering works	The amount of landfill capacity for the life of the WDF needs to be clarified and sites identified within the Plan.