

Report

- i) Issues Paper 1: Waste Minimisation, re-use and recycling and market development

- 3.1 This indicates that in 2002, 3.2 million tonnes of waste were produced in Surrey. Of this, 18% was municipal solid waste (MSW), 23% was commercial and industrial (C&I) and 59% construction and demolition waste (C&D).
- 3.2 The paper draws attention to the National Waste Strategy for England, 'Waste Strategy 2000' which sets out the relevant targets for the UK in relation to the European Landfill Directive, which are as follows:
- to reduce the quantity of biodegradable waste disposed of to landfill to 75% of 1995 levels by 2010;
 - to reduce the quantity of biodegradable waste disposed of to landfill to 50% of 1995 levels by 2013; and
 - to reduce the quantity of biodegradable waste disposed of to landfill to 35% of 1995 levels by 2020.
- 3.3 To achieve this will require significant change to waste management. The Government has introduced the Landfill Allowance Trading Scheme (LATS) which only allows disposal authorities to landfill a certain amount of biodegradable municipal waste each year. Whilst these allowances can be traded with other authorities, there will be fines for those authorities that landfill waste in excess of their allowance. The scheme starts in April 2005.
- 3.4 The paper emphasises the waste hierarchy and preferences from reducing, re-using, recovery, to disposal and outlines the need to develop a culture of waste minimisation. Draft policies are set out which promote waste minimisation, re-use and recycling including working with the business community.

3.5 **Comment**

The targets set by the EU Landfill Directive will be very difficult to achieve but the consequences of failure to comply with the LATS will be substantial financial penalties. Whilst these will be imposed on the disposal authorities (County Council) there will be substantial pressure on waste collection authorities (Boroughs and Districts) to minimise the amount of waste collected.

- 3.6 ***The targets will only be met by the disposal authorities developing sites for other forms of disposal, treatment or recycling rather than landfill, and collection authorities reducing waste entering the waste stream through waste minimisation and recycling.***

- ii) Issue Paper 2: The Proximity Principle and Development Control

- 3.7 The proximity principle is applied through 'Waste Strategy 2000' and requires waste to be managed as near to its place of origin as possible. There are a range of balances in this. A large number of smaller, local sites may be encouraged, but there may be economies of scale with a larger plant. A longer transport distance by rail or water may be preferred over a shorter distance by road.
- 3.8 The paper raises a number of issues that are used to judge planning applications set out in a range of Government guidance. It draws attention to the Regional Waste Management Strategy 2004 which does not preclude waste-related development in the Green Belt where this is consistent with the proximity principle. The paper specifically indicates that 'open windrow composting' has the characteristics of agricultural activity. It can be suitable for location in the Green Belt without adversely affecting its openness.

- 3.9 A series of draft policies are set out safeguarding sensitive designated sites and reducing pollution. Policy 5 suggests that within the Green Belt permission can be given (inter alia) for identified preferred sites, development at landfilling or landraising sites, and open windrow composting.

3.10 Comment

Whilst this Council objected to the Regional Waste Strategy's inference that waste development in the Green Belt might be acceptable (effectively 'appropriate') development as of right, it has to be accepted that the policy is now contained within the Regional Strategy, with which the County Waste LDF must conform. However, sites within the Green Belt can only be accepted where there is a clear demonstration that there are no alternative sites in the urban area, and that environmentally, they are the least worst sites within the Green Belt.

- 3.11 ***There are serious concerns about the comments on windrow composting. The experience with the former facility at Lyne is that there are a range of facilities required to support the use (buildings, plant etc.,) and that the facility caused major issues of smells which the site owner failed to resolve over a period of several years, despite guidance from the Environment Agency. These need to be fully evaluated in any new proposals.***

- 3.12 ***Proposed Policy 5 effectively indicates that a range of waste related development in the Green Belt would be acceptable and therefore appropriate. This is contrary to National Policy in PPG2 : Green Belts. Such facilities are not appropriate and could only be acceptable if there were sufficient special circumstances to outweigh the harm that they cause.***

iii) Issues Paper 3: Landfill

- 3.13 The paper gives the following data relating to annual material generated and landfilled in Surrey:

Material	Tonnes Produced	% Landfilled	Tonnes Landfilled	Overall % of Landfill
Municipal Waste	580,000	81.5%	472,700	29%
Commercial & Industrial Waste	740,000	57%	421,800	26%
Construction and Demolition Waste	1,900,000	38%	722,000	45%
	3,220,000		1,616,500	

- 3.14 Previous studies have indicated that availability of landfill void will begin to fall short after 2007 and there will be shortfall between demand and availability after 2013/14. Whilst landfill will increasingly be the last preferred option in the waste hierarchy, there will still be a need to dispose of residual wastes and therefore new sites will be needed in the future.

- 3.15 The paper suggests policies requiring that permission only be granted for landfill or land raising where the waste cannot be reused, recycled or processed, that finished levels are compatible with the surrounding area and there is long-term aftercare of the restored site.

3.16 Comment

These statistics emphasise that it is the construction and demolition waste stream that is the largest removed to landfill. However the LATS targets apply to Biodegradable Municipal Waste only. The policies to grant permission for new landfill sites only where essentially required and with environmental controls are supported.

iv) Issues Paper 4: The Identification of Sites Appropriate for the Development of Waste Related Activities

3.17 This paper outlines the methodology used to identify sites with potential for development of waste management facilities, aimed to achieve self-sufficiency within the County. Both the Regional Waste Management Strategy and the Structure Plan recognise the need to identify sites, and indeed the lack of this in the existing Waste Plan was criticised by the Planning Inspector.

3.18 The site assessment work included a desktop study and site visits.

The list of criteria included:

- Site area;
- Surrounding Uses;
- Traffic and Transport;
- Planning Policy
- Planning History;
- Landscape Designations;
- Ecology and Nature Classification;
- Agricultural Land Classification;
- Groundwater Quality;
- Surface Water Quality;
- Flooding;
- Historic Environment;
- Recreation Activities;
- Air Quality/Noise/Environmental Nuisance;
- Proximity to Waste Arisings;
- Proximity to Existing Waste Management Facilities; and
- Visual/Landscape Impact.

3.19 The site visits enabled potential opportunities and constraints to be recognised, and enabled the context of each site to be better understood, including:

- setting of the site;
- site access;
- relationship with neighbouring uses; and
- existing use or condition of the site.

The assessment considered what impact the development of a waste facility would have upon each criterion at that specific site.

3.20 Some 56 urban sites/industrial estates were initially assessed, then some 33 were selected for detailed assessment to identify those that could be suitable for development. A further report looked at 7 additional sites selected for detailed assessment.

3.21 Suggested policies in this paper indicates a presumption in favour of granting planning permission for various facilities at yet to be specified sites.

3.22 Comment

It is inevitable that new facilities will be required, and proper that sites are identified following a detailed analysis of the merits of the sites both individually and comparatively. This will give greater certainty to the Development Control process in dealing with individual planning applications.

3.23 *However, as a number of the sites will be in Green Belt locations, policies cannot presume in their favour as this would make them appropriate development. The policies should be separated between those sites in the urban area and those in the Green Belt, and be differently worded to reflect the designations and general planning policy.*

v) Assessment of the best Practicable Environmental Option for Waste Disposal

3.24 This is a detailed assessment of the various options for each of the waste streams to be able to meet the targets for the diversion of waste from landfill. The options are as follows:

Municipal Solid Waste

Name	Description
Option 1	Mixture of a high recycling and composting rate, two Energy from Waste (EfW) facilities, and landfill
Option 2	Mixture of a high recycling and composting rate, two Mechanical Biological Treatment (MBT) facilities, and landfill
Option 3	Mixture of a high recycling and composting rate, two autoclaving facilities, and landfill
Option 4	Mixture of a high recycling and composting rate, two Anaerobic Digestion (AD) facilities, and landfill
Option 5	Mixture of a high recycling and composting rate, five AD facilities and landfill
Option 6	Mixture of a high recycling and composting rate, ten smaller AD facilities and landfill
Option 7	Employs a hybrid approach, involving a mixture of a high recycling and composting rate, a combination of EfW and autoclaving treatment, and landfill
Option 8	Employs increased recycling and composting (to 55%), AD, and landfill

Commercial and Industrial Waste

Name	Description
Option 1	A 'do nothing scenario' with a stable recycling and composting rate of 32%, the additional recovery rate remains at 11%, and remaining waste sent to landfill
Option 2	Employs an increased composting and recycling rate (43% by 2015), and increasing recovery rate to 15%, and a subsequent reduction in waste landfilled. This option represents the C&I waste targets outlined in Waste Strategy 2000.
Option 3a	Employs a higher recycling and composting rate (to 60% by 2020), 21% recovery (EfW), and subsequently a large reduction in waste deposited to landfill. This option represents targets set out in the Regional Waste Management Strategy 2003.
Option 3b	As Option 3a except that MBT is used as the recovery technology as opposed to EfW.
Option 4	Represents a very high level of diversion from landfill, above any of the national or regional targets, with a recycling and composting rate reaching 60% by 2020, the additional recovery rate rising to 23% and remaining waste disposed of to landfill.

Construction and Demolition Work

Name	Description
Option 1	A 'do nothing scenario' with a stable recycling rate 43% and there is no reduction in waste going to landfill
Option 2	An increased recycling rate (50% by 2020) and reduced tonnage disposed of to landfill. This option meets the long-term Regional Waste Management Strategy targets.
Option 3	A higher recycling rate (to 60% by 2020) and waste going to landfill is reduced down to 11%. This option goes beyond targets set out in the Regional Waste Management Strategy.

3.25 Comment

Whichever option or options is eventually chosen, it is important that the reasons for selection are clearly set out and to ensure that they have been subject to a thorough Sustainability Appraisal and Strategic Environmental Assessment.

4. Individual Site Assessments

- 4.1 This section of the report indicates only those sites within Runnymede which have been analysed for potential waste related development.
- 4.2 The first assessment looked at urban sites and industrial estates. Two were in Runnymede, Thorpe Industrial Park and the Fordwater Trading Estate in Chertsey. In both cases, no sites were available for use and although the Thorpe Estate was thought to potentially offer suitable plots in the future, neither site was considered appropriate to investigate further.
- 4.3 The second assessment looked in detail at the three Runnymede sites, all in close proximity to each other:
- Lyne Lane, Chertsey (Civic Amenity Site)
Lyne Lane, Chertsey (former compost site)
Lyne Lane, Chertsey (sewage treatment works)
- 4.4 The first site is clearly in use as a waste facility, but the site is small and the assessment concludes that it offers no potential for any further development.
- 4.5 The second site lies on the western side of Lyne Lane and was, until recently, occupied as a green waste composting site operating under a temporary planning permission which expires in 2005. The assessment concludes that it has an established waste management use and should be available for redevelopment, and therefore should be safeguarded for future waste development.
- 4.6 The sewage treatment works is owned by Thames Water who have no plans to discontinue operations at the site. The assessment concludes that the site does not offer potential for development within the plan period, although notes that being allocated as a Major Development Site in the Green Belt, if it became available in the future, it offers good potential for waste management development.

4.7 Comment

It is agreed that the Civic Amenity site offers no potential for further expansion (the land to the east is farm land critical to the viability of the adjoining farm) but is a very useful local facility and needs to be safeguarded to retain its use.

- 4.8 ***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 prominent 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.***
- 4.9 ***Whilst it is accepted that the sewage treatment works is a previously developed site, its designation as a Major Developed Site in the Green Belt by the Local Plan Inspector did come with the caveat that this designation might be reviewed if it ever became vacant. However, as the site has been discounted from consideration for the purposes of the present plan period, this is an issue for the future.***
- 4.10 The third assessment identified land adjacent to Trumps Farm, Kitsmead Lane, Longcross for consideration. This is land immediately south of the M3 Motorway and immediately north of the Trumps Farm Landfill site. The site is described as being despoiled and at a lower land level than adjoining land. As it is near to the former DERA MoD facility, which is designated as a Major Developed Site in the Green Belt, the assessment suggests that 'the principle of development is accepted within this locality'.

4.11 Comment

Whilst the land has been used by the Highways Agency in the past and has areas of hardcore, it is not considered that it would take a great deal to restore it to attractive open land. It is at a lower level from adjoining land as the County Council permitted land raising as part of the restoration of the adjoining former tip. The DERA Major Developed Site does not include this land and the site therefore cannot benefit from any concessions to Green Belt policy that such an allocation affords.

- 4.12 ***The fact that this area has already suffered severe environmental damage by the M3 to the north and the landraising to the south, together with the potential development in the future of the former DERA site and potential mineral workings at Trumps Farm, points to the need to safeguard remaining land for proper open Green Belt purposes rather than suggesting further development, and strong objection should be raised to its potential for waste development.***

5. Strategic Environmental Assessment and Interim Sustainability Appraisal

- 5.1 The purpose of a sustainability appraisal (SA) is "...to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans..."^[1] and is a requirement of the Planning and Compulsory Purchase Act 2004. Government guidance is that a SA should "incorporate the requirements of the Strategic Environmental Assessment (SEA) Directive"^[2]. The SEA Directive^[3] is transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004^[4].

- 5.2 Two reports have been supplied pursuant to the above regulations and guidance; Strategic Environmental Assessment of Surrey Waste Local Plan – Draft Final Environmental Report September 2004 (SEA-ER), and Interim Report of a Sustainability Appraisal of the Surrey Waste Development Framework (SA-IR), October 2004.

5.3 Comment

The SEA-ER, substantially meets the requirements of the SEA regulations, in both content and process. However, a number of points need to be born in mind:

- ***the SEA was carried out pre the release of the Consultation on PPS 10: Planning for Sustainable Waste Management, which effectively is recommending removal of the Best Practicable Environmental Option (BPEO) assessment from waste planning, and***
- ***there were a number of limitations on the assessment based on the lack of high resolution data.***

- 5.4 ***The SA-IR appears to be a first draft, therefore detailed comment on its content at this stage would probably add little to the evaluation of the appraisal. However, comment on the methodology used may be beneficial, and the following points may warrant consideration:***

- ***reliance on the BPEO work may need to be redressed within future iterations of the SA.***
- ***there does not appear to be any reference made to any assessment of compliance of the earlier SA of the Surrey Structure Plan (November 2002) which is used to discount consideration of 'Key Sustainability Issues',***

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks – Consultation Paper 7 September 2004.

² http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030923.pdf (pg.16)

³ http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_197/l_19720010721en00300037.pdf

⁴ http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_029731.pdf

- ***the final SA report will need to ensure that it can demonstrate that its assessment is based on the latest and most up-to-date information, so that it can emphasize its ability to provide an objective sustainability appraisal of the Surrey Waste Development Framework, and not simply a platform for the reiteration of other assessments and reports.***

5.5 Guidance also suggests that the; "SA is an iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined." [5] Whilst the SEA provides an important but individual component to the total SA process, it specifically focuses its assessment on what can be classified as 'environmental issues'. The SEA does not attempt to address in detail the three other components of sustainability, economic, social or resource use. Therefore, there is an expectation not only to see these components as comprehensively assessed within the SA-IR as the environmental component has been addressed within the SEA, but also for the appraisal to address the combined impact the plan has made towards the promotion of sustainable development through better integration of sustainability considerations into the preparation and adoption of the plan.

6. Conclusion

- 6.1** To comply with European Directives and UK legislation there is an urgent need to find alternative methods of waste treatment than landfill. The proximity principle means that it is most sustainable to treat or dispose of waste as close as possible to where it is generated. This would suggest a larger number of smaller facilities spread across the country.
- 6.2** There is concern that the consultation effectively promotes development within the Green Belt as being appropriate. Clearly, this approach is wrong in law, as such development is inappropriate, but may be acceptable where there are special circumstances to outweigh the harm caused. In this context, it may be that where it can be demonstrated that there are no alternatively available sites in the urban area, and what is being promoted is, environmentally, the least worst Green Belt site, then this may constitute special circumstances.

⁵ Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks – Consultation Paper 7 September 2004.