

Development of Surrey Material Recycling Facility (MRF)

Did you use the EIA Screening Tool?

Yes

1. Explaining the matter being assessed

This is a:

- A new function

Summarise the strategy, policy, service(s), or function(s) being assessed. Describe current status followed by any changes that stakeholders would experience.

Surrey residents produce approximately 120,000 tonnes of Dry Mixed Recycling (DMR) a year. DMR is a mix of paper and card, glass packaging, plastic packaging, and steel and aluminium cans separated from the black bag waste by householders. The district and boroughs as the Waste Collection Authorities (WCAs) are responsible for collecting this material from households. Currently, the collected DMR is either transported directly by the WCAs to third party Material Recycling Facilities (MRFs) within Surrey or is bulked by SCC's contractor SUEZ at various waste transfer stations (WTS) in the County and subsequently delivered to MRFs outside of Surrey. The current waste services contract for DMR ends in 2029 and the Resource & Circular Economy (RCE) service is exploring the opportunity to develop a MRF at Trumps Farm (owned by SCC) in Runnymede to coincide with the end of these contracts.

The MRF will be an active waste processing site that will not be open to the general public, with blanket restrictions on public access to the facility. The only change to stakeholders using the service will be the location of where DMR is tipped; all other elements of the current service will remain the same. There are however considerations required for staff employed to operate the MRF, therefore this EIA will be limited in scope to solely address this (section 3).

There are no foreseeable indirect impacts on the public or employees either working at the MRF or those employed by the WCAs. The operation of the MRF will be a discrete contract let as part of RCE's wider procurement for services in 2029 and while it is possible that the same contractor operating the MRF operates other waste infrastructure on behalf of SCC, any impacts on protected characteristics are mitigated as per section 3.

As part of the pre-planning application process, a public consultation was undertaken between December 2023 and March 2024. A comprehensive stakeholder mapping exercise was carried out at the outset of the project to identify all relevant stakeholders, including elected members of SCC, Runnymede Borough Council and Chobham Parish Council, site neighbours, local businesses, local public facilities, and community groups.

The engagement activities undertaken by SCC included:

Equality Impact Assessment

- Pre-application information sharing and pre-submission engagement on the proposals between 21 December 2023 and 5 March 2024.
 - Pre-application information sharing with SCC began on 21 December 2023, with SCC making a Pre-Application Advice Request to the Planning Authority (SCC).
- An engagement flyer (sent to 502 properties), and introductory emails (sent to 52 stakeholders) were shared by SCC ahead of the engagement period.
- The public engagement period ran from Monday 5 February to Friday 1 March 2024 via a bespoke project virtual room and two in-person public engagement events held on
 - Friday 9 February at Lyne Village Hall in Chertsey; and
 - Sunday 11 February at Virginia Water Community Association.

9

The virtual room provided detailed information about the proposals, as well as an interactive feedback form. Paper versions of the feedback form were also available on request and at the in-person events with a freepost addressed envelope available on request to return the completed form. Members of the public could contact the project team to ask questions through a variety of methods including the dedicated project email address, by contacting SCC's contact centre and by freepost addressed envelope on request.

SCC is committed to ongoing engagement with the local community, through to planning determination and beyond. The SCC website will be updated with any news of progress on the planning application and key stakeholders will be notified. Following the submission of the Outline Planning Application (December 2024), SCC will undertake a statutory consultation with residents and stakeholders, who will have the opportunity to view the planning application documents and submit comments to SCC via its planning portal. Subject to securing planning consent, SCC's application team will continue to work with key stakeholders and local people to discuss the proposals and inform the scheme's development.

How does your service proposal support the outcomes in [the Community Vision for Surrey 2030](#)?

This work relates to the following 'Place' ambition:

'Residents live in clean, safe and green communities, where people and organisations embrace their environmental responsibilities.'

Are there any specific geographies in Surrey where this will make an impact?

- Runnymede

Equality Impact Assessment

Assessment team – A key principle for completing impact assessments is that they should not be done in isolation. Consultation with affected groups and stakeholders needs to be built in from the start, to enrich the assessment and develop relevant mitigation.

- Surrey County Council
 - Nick Wallace-Jones, Strategy & Policy Officer and RCE Equalities Champion
 - Main author
 - Dr Jade-Ashlee Cox-Rawling, Head of Strategy & Policy, RCE
 - Reviewer and Project Lead
 - Joe Osborne, Strategic Lead - Policy & Strategy
 - Reviewer

2. Service Users / Residents

Who may be affected by this activity?

The MRF will be an active waste processing site that will not be open to the general public, with blanket restrictions on public access to the facility. There is no impact on or need for the acknowledgement of any protected characteristic or any group and there are no foreseeable indirect impacts on the public. As part of the pre-planning application process, a public consultation was undertaken between December 2023 and March 2024, with a statutory consultation occurring as part of the planning process following submission of the Outline Planning Application. Subject to securing planning consent, SCC's application team will continue to work with key stakeholders and local people to discuss the proposals and inform the scheme's development.

3. Staff

All protected characteristics and vulnerable groups

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

The MRF will be an active waste management site, the primary purpose of which is to sort DMR into separate material streams through predominantly mechanical means. To manage this operation, there will be numerous staff required, however as the facility is not yet built there is no data available. It should be noted that the construction and operation of the MRF will be delivered through a private sector operator, secured through a competitive procurement process.

A key component of the procurement criteria will be to ensure that the successful bidder is fully compliant with Section 149 (Public Sector Equality Duty) of the Equality Act 2010 and is an accredited 'equal opportunities employer'. These criteria will be listed as part of the method statement submission requirements with bidders obliged to detail:

- How they are and will be compliant with the Equality Act 2010
- All company policies and procedures on:
 - Recruitment,
 - Training and retention
 - Bullying and harassment
 - Supply chain management etc.
- Their accreditation as an equal opportunities employer
- Track record on equality from previous projects
- Any case studies on rectifying / furthering equal opportunities in their company / operations

In addition to evidence provided as part of their submission that bidders have satisfied the points listed above, the key practical implications for the facility will be the provision of adequate welfare / washroom facilities suitable for all sexes / genders and disabled parking and access (most likely for visitors). This will form part of the design process that will feed into the operation, and the procurement process will allow bidders to confirm how they will deliver these, balancing compliance with the Equality Act 2010 and the practical operation of an active waste management facility.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

In addition to the requirements listed above, significant focus will be given to what Social Value the bidders can deliver for the project. The procurement process will include significant engagement with the bidders, with Social Value forming a key component of discussions to ensure bidders are clear on SCC's aims and aspirations for the project as well as providing forums to discuss how equality considerations can be harnessed to deliver Social Value in Surrey, particularly through recruiting from marginalised / under-represented groups, for example.

Equality Impact Assessment

The RCE service's most recent procurement for residual 'black bag' waste has secured exceptional Social Value benefits for the term of the (minimum) 10-year contract and RCE would seek to use this as a template to refine with procurement colleagues to maximise the Social Value opportunity provided by this facility, with equality at the forefront.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None

Any negative impacts that cannot be mitigated?

None

9

4. Recommendation

Based your assessment, please indicate which course of action you are recommending to decision makers. You should explain your recommendation below.

- **Outcome One: No major change to the policy/service/function required.** This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken
- **Outcome Two: Adjust the policy/service/function** to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
- **Outcome Three: Continue the policy/service/function** despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:
 - Sufficient plans to stop or minimise the negative impact

Equality Impact Assessment

- Mitigating actions for any remaining negative impacts plans to monitor the actual impact.
- **Outcome Four: Stop and rethink the policy** when the EIA shows actual or potential unlawful discrimination. (For guidance on what is unlawful discrimination, refer to the [Equality and Human Rights Commission's guidance and Codes of Practice on the Equality Act](#) concerning employment, goods and services and equal pay).

Recommended outcome:

- **Outcome One: No major change to the policy/service/function required.** This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken

Explanation:

The MRF will be an active waste processing site that will not be open to the general public, with blanket restrictions on public access to the facility. There is no impact on or need for the acknowledgement of any protected characteristic or any group within the public.

For staff operating the facility, we will deliver a compliant and considered procurement process that:

- Engages with bidders to inform and refine the process
- Emphasises bidder adherence to the Equality Act 2010
- Allows bidders to detail case studies and provide accreditation on their approach to equality
- Gives appropriate weighting to Social Value to mitigate and counterbalance equality challenges posed by an active waste processing facility

We believe this approach takes all reasonable measures to mitigate the risk of discrimination and / or negative impacts, promoting equality wherever possible.

5. Action plan and monitoring arrangements

Item	Initiation Date	Action/Item	Person Actioning	Target Completion Date	Update/Notes	Open/Closed
1	22/01/25	Liaise with SCC planning to establish statutory consultation process	JACR	February 2025		Open
2	22/01/25	Develop equalities and social value elements of procurement strategy	JACR / Harriett Harvey / NWJ	May 2025	Procurement strategy to be developed following Cabinet approval of scheme	Open
3	22/01/25	Update EIA as required	NWJ	To FBC – Oct 2026	Rolling reviews to occur to FBC	Open

Page 170

6a. Version control

Version Number	Purpose/Change	Author	Date
v00.01	First draft	Nick Wallace-Jones	08/01/25
v00.02	Updated in light of JO comments	Nick Wallace-Jones	22/01/25

The above provides historical data about each update made to the Equality Impact Assessment.

Equality Impact Assessment

Please include the name of the author, date and notes about changes made – so that you can refer to what changes have been made throughout this iterative process.

For further information, please see the EIA Guidance document on version control.

Equality Impact Assessment

6b. Approval

Secure approval from the appropriate level of management based on nature of issue and scale of change being assessed.

The level of EIA sign off will depend on who the change affects. Generally speaking, for strictly internal changes, Head of Service/ Exec Director sign off should suffice. For changes affecting residents, the Cabinet Member is required to approve completed EIAs.

Approved by	Date approved
Head of Service	
Executive Director	
Cabinet Member	
Directorate Equality Group/ EDI Group (If Applicable) (arrangements will differ depending on your Directorate. Please enquire with your Head of Service or the CSP Team if unsure)	

9

Publish:

It is recommended that all EIAs are published on Surrey County Council's website.

Please send approved EIAs to: equalityimpactassessments@surreycc.gov.uk

EIA author:

6c. EIA Team

Name	Job Title	Organisation	Team Role

If you would like this information in large print, Braille, on CD or in another language please contact us on:

Tel: 03456 009 009

Textphone (via Text Relay): 18001 03456 009 009

SMS: 07860 053 465

Email: contactcentre@surreycc.gov.uk