Surrey Waste Plan 2008

Self-assessment of consistency and compliance with:

- 1 National Planning Policy Framework (NPPF) 2012
- 2 National Planning Policy for Waste 2014
- 3 EU Waste Framework Directive 2008

1 Consistency with NPPF¹

1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to	Relevant questions	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences?
deliver its objectives			Do they affect your overall strategy?
Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15). The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)	Does the plan positively seek opportunities to meet the development needs of the area? Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)? Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development?	The vision (Para B3) Objectives (Para B4) and Policies CW1 and CW4 cover the principles of sustainable development. Policy CW4 is based on the principle of net self-sufficiency. Policies CW4 and WD1 – WD7 are positively framed. The plan sets out how the assessed waste management needs can be met in urban areas on land in industrial or storage use or allocated for these purposes, and on identified sites outside urban areas.	The plan sets out in a positive way how the waste management needs of the area can be met and is therefore in accordance with the NPPF.

¹ This assessment is based on the questions set out in the Planning Advisory Service Local Plans and the NPPF Self-Assessment Checklist¹. The NPPF contains new or significantly different elements from previous national policy. Only those which are considered relevant to the Waste Plan are addressed. The NPPF does not contain any specific waste policies. National waste planning policy is published separately.

1B: Delivering sustainable development

Building a strong, competitive economy (para 18 - 22)			
What NPPF expects local plans to include to deliver its objectives	Relevant questions	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences?
deliver its objectives			Do they affect your overall strategy?
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	In supporting economic development, to what extent does it take into account the matters raised in paragraph 21 of the NPPF? This includes • setting criteria for and identifying strategic sites for inward investment and • meeting anticipated needs; supporting existing business sectors and new/emerging sectors.	The plan identifies potential strategic sites for a range of waste management uses and technologies. The plan is technology neutral and remains relevant for more recent emerging technologies such as anaerobic digestion (AD) and gasification.	Plan positively promotes the development of appropriate waste management facilities in accordance with principles in the NPPF

Promoting sustainable transport (paras 29-41)			
What NPPF expects local plans to include to deliver its	Relevant questions	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences?
objectives			Do they affect your overall strategy?
Policies that facilitate sustainable development but also contribute to wider	Have you worked with adjoining authorities and transport providers	WD1 – WD7. A full range of waste management solutions is provided for.	Fully conforms with NPPF
sustainability and health objectives (29).	on the provision of viable infrastructure?	B4. The proximity principle is included as one of the plan's strategic objectives.	
Different policies and Different policies and different communities and opportunities to maximise sustainable transport solutions will vary from		Policy CW5 – Location of waste facilities gives priority to urban areas above greenfield land. The plan emphasises the importance of locations well served by the strategic road network or accessible by alternative means of transport – particularly or larger waste management uses.	
urban to rural areas (29).		No reference but little potential for alternative modes of transport as recognised in B15	

	Protecting Green Belt land (paras 79-92)			
	What NPPF expects local plans to include to deliver its objectives	Relevant questions	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences?
				Do they affect your overall strategy?
	The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)	If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy?	The strategic objectives of the plan seek to protect the green belt but in doing so recognise the particular locational needs of some waste management facilities (B4)	The plan is consistent with NPPF Green Belt policies.
Tage / y	Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).		The Plan seeks to meet identified need by allocating potential waste sites. Most of these sites are in the Green Belt – and are identified on the basis that there may be special circumstances relating to the sites that in combination with need would amount to the <i>very special circumstances</i>	
	Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)		needed to justify inappropriate development in the Green Belt. There is nothing in the NPPF which suggests any change to this approach.	

Meeting the challenge of climate change, flooding and coastal change (paras 93-108)			
What NPPF expects local plans to include to deliver its objectives	Relevant questions	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).	Does the plan positively promote the generation of energy from renewable or low carbon sources? Have you planned new development in locations and ways which take account of flood risk and reduce greenhouse gas emissions?	Policy DC3 covers greenhouse gases, drainage and flood risk Sustainable waste management is supported in objectives and Policy CW1 Waste minimisation and Policy CW3 Waste Markets. The Plan seeks to significantly improve the infrastructure for waste management by using waste as a resource and driving waste up the waste hierarchy. This includes deployment of energy from waste technologies where appropriate. The selection of sites was informed by a comprehensive site assessment undertaken by consultants ERM in 2004. The criteria used included consideration of the 'proximity principle' and the proximity to existing waste management sites as well as flood risk and transport links. There are a number of detailed reports and, of course, the Inspector's report into the Public Examination of the Local Plan in 2007.	Although there is no specific climate change reference the plan is consistent with NPPF policies.

Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	Relevant questions	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Local Plans should: Plan positively for the development and infrastructure required. (para 157)	Have you objectively assessed development needs and planned for them? If you can't meet them in your area, have you cooperated with others on meeting them elsewhere? (para 182)	In line with national policy the plan seeks to meet assessed need on the basis of net self-sufficiency. In addition the Plan seeks to meets the need to provide for a declining amount of waste exported from London. Sufficient land is identified to accommodate the capacity to meet this assessed need. Cooperation with adjoining authorities is ongoing.	Consistent with NPPF expectations

Using a proportionate evidence	base (paras 158-177)		
What NPPF identifies in relation to the development of local plans	Relevant questions	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Ensuring viability and deliverability The sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (173)	To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements? In so doing to what extent has it taken into account the normal cost of development and on-site mitigation and provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (173)?	The Plan is predicated on proven technologies and is not technology specific. There have been advances in AD, pyrolysis, gasification etc but this is covered by relevant policies. Evolving technologies (e.g. more intensive recovery) may no longer be considered as 'bad neighbour uses' but may increase opportunities for new sites – particularly in urban industrial areas – in accordance with plan policies. Four of the Plan allocated waste sites accommodate operational waste management facilities. Only one allocated site has been lost to nonwaste related development (Heather Farm, Horsell).	The Plan continues to facilitate the delivery of a range of waste management facilities and therefore meets NPPF expectations

2 Consistency with National Planning Policy for Waste

An assessment of the consistency of the Surrey Waste Plan 2008 (the Plan) with the National Planning Policy for Waste issued October 2014 (NPPW) has been undertaken. Each main section of the NPPW has been considered and summarised in the table below. The assessment of the Plan's consistency with each section is also set out below. The findings indicate the Plan is broadly consistent with the NPPW.

Introduction (Para 1)		
Requirement	Assessment of Consistency	
Delivery of sustainable development and resource efficiency by driving waste management up the waste hierarchy	Vision (B4) includes for providing sustainable development by driving waste management up the waste hierarchy and addressing waste as a resource.	
Ensure waste management is considered alongside other spatial planning concerns.	The Plan emphasises the importance of Waste Management with Policy DC1 safeguarding existing and proposed sites. A comprehensive <u>site</u> <u>assessment</u> process was undertaken with consideration of a range of other spatial planning issues.	
Provide framework in which communities and businesses are engaged with and take more responsibility for their own waste or for mixed MSW from households it is recovered in line with the proximity principle	Policies CW1 and CW3 provide for improving awareness of sustainable waste management. Plan prepared on basis of Surrey Structure Plan DN18 proximity principle.	
Help waste management without endangering human health and without harming environment.	Policy DC3 seeks to protect people and the environment. Planning permission will only be granted if the impacts of a development can be controlled to achieve levels that will not significantly adversely affect people, land, infrastructure and resources.	
Ensure design and layout of residential and commercial and other infrastructure facilitate high quality collections.	The Plan does not contain any specific policies relating to residential design – but this is an issue for borough and district councils.	

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In preparing Local Plans: Using a proportionate evidence base (Para 2)		
Requirement	Assessment of Consistency	
Plan new capacity and its spatial distribution based on best data and an appraisal of options.	Full evidence base presented at public examination of the Plan. <u>Issues and options</u> consulted on November 2004 to February 2005 and July to August 2005. Comprehensive <u>site assessment</u> undertaken. A full list of <u>supporting documentation</u> is available online. Evidence base is reviewed through the AMR and has recently been updated.	
Work jointly and collaboratively with other planning authorities taking account of arisings forecasts and proportion to be	Work took place collaboratively through SERTAB (now SEWPAG).	
recycled.	Provision made in Policy CW4 for contribution to meet declining landfill needs of London.	
	Recycling and composting targets set out in Table 2.1. Arisings projections set out in Table 2.2. These are updated in the AMR and have been subject to recent review.	
Ensure waste management needs considered alongside other spatial planning concerns.	Policy DC1 – Safeguarding Sites – seeks to ensure that the need for waste management infrastructure is taken into account in considering other possible uses of a site.	
In preparing Local Plans: Identify need for waste management facilities (Para 3)		
Undertake engagement with communities so that plans reflect collective vision.	Engagement was extensive – including three key stakeholder workshops and over 42 community workshops during May to October 2004. Two consultations on issues and options followed by a preferred plan consultation in 2005.	

In preparing Local Plans: Identify need for waste management facilities (Para 3)		
Requirement	Assessment of Consistency	
Drive waste management up the waste hierarchy and adequate provision made for waste disposal.	Driving waste management up the waste hierarchy is a strategic objective of the Plan. The SWP seeks to divert waste from landfill and the sites identified provide sufficient potential capacity to manage the anticipated tonnage of waste arisings across waste streams. Provision for some disposal capacity is also accounted for.	
Identify tonnages and percentages of municipal and C & I requiring different types of management.	Comprehensive Need assessment was undertaken across all waste streams Tonnages of waste to be managed set out in Table 2.2 based on apportionment in the SE Plan. Recent assessment shows that overall tonnages to be managed have fallen across municipal and C& I waste streams since adoption but remain broadly of an equivalent magnitude to those in the adopted plan. Recycling and composting targets are set out in Table 2.1. Policies WD2, WD3, WD4 and WD5 provide flexibly for different types of waste management.	
Consider need for additional waste management capacity of more than local significance.	Policy CW4 (and Para B33) makes provision for declining landfill needs of London.	
Take account of waste arising in more than one waste planning authority.	See above. Monitoring takes account of waste imports and exports and the availability of appropriate management facilities elsewhere with the aim of net self-sufficiency.	
Work collaboratively with other waste planning authorities through DtC.	Plan predates DtC requirements. SCC is a member of SEWPAG and wide ranging notification and consultations took place with other waste planning authorities in the preparation of the Plan. Cooperation is an ongoing basis.	
Consider how existing capacity would satisfy future need.	Existing capacity and its ability to meet future need was assessed at the time of plan preparation and is monitored through the AMR	

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In Local Plans: Identify suitable sites and areas (Paras 4-6)		
Requirement	Assessment of Consistency	
Identify types of waste management facility that would be appropriately located not stifling innovation.	The Plan identifies a range of potential waste management facilities (Waste Development section). The Plan is not technology specific and is designed to be able to accommodate new technologies that are developed.	
	The continued deliverability of allocated sites is monitored through the AMR.	
Plan for disposal and recovery of mixed municipal waste in line with the proximity principle.	A range of Civic Amenity Sites (known as Community Recycling Centres) are identified, safeguarded and Policy WD1 encourages their improvement and the provision of new sites.	
	The Plan seeks to increase the recycling of municipal waste through the provision of sites for recycling, storage, transfer and materials recovery. Recycling rates for municipal waste are monitored through the AMR and exceed the current Plan target.	
	The Plan allocates sites which provides capacity for additional facilities for energy recovery	
Consider on-site management of waste.	Plan indicates on-site management should take place wherever possible (Para B9). The Surrey Joint Municipal Waste Management Strategy complements the SWP in seeking to encourage such measures as home composting.	
Consider broad range of locations including industrial sites looking for opportunities to co-locate with complementary activities. Low carbon energy recovery facility to be located so as to enable utilisation of heat.	Potential urban sites and industrial estates are set out in table 3.1. Advantages of co-location of waste facilities are acknowledged in the Plan (Paras C2 and C9). The potential of the recovery of heat from thermal treatment facilities is acknowledged in the Plan (Para C21).	

In Local Plans: Identify suitable sites and areas (Paras 4-6)		
Requirement	Assessment of Consistency	
Prioritise the re-use of pdl, employment land and redundant agricultural and forestry buildings.	The Plan makes this priority (Policies WD1, WD2, WD4, WD5 and Para B13).	
The suitability of potential sites should be assessed by: the extent to which the site supports other Plan policies; the physical and environmental constraints on development;	The Plan identifies the types of waste facility that will drive waste management up the waste hierarchy (Policies WD1, WD2, WD3, WD4 and WD5. In assessing the suitability of sites a full range of criteria were used including other Development Plan Policies (such as Green Bet and AONB) transport infrastructure and environmental constraints. See Site Assessment Reports	
the capacity of transport infrastructure and where appropriate use other modes than road transport;	The Plan sets out the key development criteria for considering the allocated sites including physical and environmental constraints, and transport infrastructure. The Plan indicates the County Council is committed to taking advantage of opportunities for alternative modes of transport (Para B40).	
the cumulative impact of existing and proposed waste facilities on the local community	Cumulative impacts are not covered per se. These can nevertheless be assessed at the planning application stage.	
Sites search should firstly look for sites and areas outside Green Belt.	The Plan prioritises the use of land outside the Green Belt but acknowledges that since much of Surrey is covered by the designation, it is expected that some development may occur within the Green Belt (Policy CW6 and Paras B13 and B41) if very special circumstances prevail.	

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When determining planning applications (Paras 7 – 8)		
Requirement	Assessment of Consistency	
Only expect applicants to show market need where proposals are not consistent with an up to date Local Plan.	The Plan does not require applicants to demonstrate need for new or enhanced waste management facilities. Update of arisings data should assist.	
Expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy	Proposals would be considered in terms of the visions and strategic objectives of the Plan (Paras B3 and B4) and should be in accordance with the Locational Strategy of the Plan (Section 2.1.1 and Policies CW5: Location of Waste Facilities and CW6: Development in the Green Belt (if applicable)).	
Consider the likely impact on the environment and amenity against criteria in Appendix B.	The Plan includes these criteria as key development criteria for sites allocated in the Plan. Development Control Policies DC2: Planning Designations and DC3: General Considerations require consideration of the likely impact against all the listed criteria.	
Ensure waste facilities are well designed.	The Plan indicates that a high quality of design and site layout is expected (Policy DC3 and Para D10).	
Implement the planning strategy in the Local Plan and not pollution control processes.	The Plan recognises the distinction (Para D8).	
Ensure land raising and landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards.	The Plan requires that such activities lead to a substantial improvement in the quality of the land (Policy WD7).	
Impact of proposed non-waste related development on existing and potential waste management sites.	Safeguarding of waste sites is provided for by Policy DC1.	

When determining planning applications (Paras 7 – 8)		
Requirement	Assessment of Consistency	
New non-waste related development makes provision for waste management, promotes good design and integration of waste management and minimises off-site disposal.	Mainly a responsibility for Surrey Districts. Policy CW1 promotes the principle of waste minimisation in construction projects.	
Note:		
The NPPW removed the previous guidance in withdrawn PPS10 that the locational needs of waste management, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.	The Plan is clear that all applications in the Green Belt have to demonstrate very special circumstances if planning permission is to be granted. The Plan indicates that these considerations may contribute to very special circumstances when considering applications in the Green Belt but does not suggest that significant weight should be given over and above other considerations. When read with the NPPW the SWP remains consistent with current policy.	
Monitoring and Report (Para 9)		
To inform the preparation of Local Plans and to inform the determination of planning applications, LPAs should monitor:	The Plan makes such provision (Section 5.1) and these issues are monitored through the AMR and updated in recent data reports.	
take up in allocated sites;		
Existing stock and changes in stock of waste management facilities;		
Amounts of waste recycled, recovered and disposed.		

3 Compliance with the EU Waste Framework Directive

The assessment addresses the criteria contained in the EU Waste Framework Directive (revised 2008) and addresses whether or not the Waste Plan remains consistent with these legislative requirements.

Checklist	Compliance Assessment
Does your local waste plan?	
 Set out how the key planning objectives in the waste hierarchy will be delivered 	One of the Plans strategic objectives is to help deliver sustainable development by driving waste management up the waste hierarchy (Para 2.1 B4)
 Provide an assessment of existing and future generation of waste arising over the plan period? 	Yes - Paras 1.2.1 and 1.3 cover arisings. The Annual Monitoring Report (AMR) monitors waste arisings.
 Identify where the waste will be managed? 	
 Consider and clearly identify waste management capacity from existing waste management facilities? 	Yes - the plan contains a spatial strategy (2.1) and more detailed development policies and allocated waste management sites
	Yes – clearly identified and monitored (B7).
 Consider and clearly identify future capacity from existing waste management facilities? 	Yes. Existing capacity is identified and with additional capacity encouraged.
 Identify the number and type of waste management facilities required – including existing facilities – along with specific sites or broad locations?; 	Yes – as. The Plan provides sufficient capacity in terms of sites and policies to facilitate the treatment of the equivalent of waste arising in Surrey part of monitoring process

Article	Requirement	How it might look	Compliance Assessment
Waste hierarchy as a priority order in waste	Prepare and deliver planning strategies which drive waste management up the hierarchy, addressing waste as a resource	Driving waste management up the waste hierarchy is a strategic objective of the SWP (Para B4) and applicants will be expected to demonstrate how their proposals integrate into a sustainable approach to waste management in Surrey (Para B7).	
	and legislation	and looking to dispose as the last option.	Surrey County Council remains committed to achieving net self-sufficiency, enabling appropriate development that implements the waste hierarchy (Para B30).
			Waste development proposals reflect the waste hierarchy (Para C1). Policy WD5 states that permission for thermal treatment will only be granted if the waste to be treated cannot practically and reasonably be reused, recycled or processed to recover materials.
			Landfill is seen as an option of last resort and planning permission will only be granted for waste disposal by landfilling if the waste to be disposed of cannot practicably and reasonably be reused, recycled or processed (to recover materials; produce compost, soil conditioner, inert residues or to recover energy) or be required for the restoration of mineral workings (Para C28).
Article 13: Protection of human health and the environment	Ensure that any waste is handled in a manner which guards against harm to human health and the environment	Test the suitability of proposed sites for development against paragraph 7 of the NPPW and in doing so consider the factors set out in Appendix B.	All allocated sites have undergone exhaustive assessment. All proposals will be assessed for compliance against Policy DC3 that reflect the factors set out in Appendix B.
			Key Development Criteria identified for all allocated waste management sites.

Surrey Waste Plan Compliance with EU Waste Framework Directive 2008

Article	Requirement	How it might look	Compliance Assessment
Article 16: Principles of proximity and self- sufficiency	(As far as is practicable) establish an integrated and adequate network of waste disposal installations for the recovery of mixed municipal waste collected from private households The requirement to be self-sufficient in waste disposal is set out at national level,	A framework in which communities should take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities. (NPPW) Waste disposal facilities and facilities for the recovery of mixed municipal waste collected from households are appropriately sited. Joint working with other planning authorities to develop an extensive network of sites	Net self-sufficiency is a strategic objective of the SWP (Para B4). Policy CW4 seeks to provide enough waste management capacity to manage the equivalent of waste arising in Surrey. Policy WD1 complements the Joint Municipal Waste Strategy in encouraging the improvement or extension of civic amenity sites (known as community recycling centres) or the provision of new sites. The assessment and identification of allocated sites has regard to the proximity principle.
Article 28: Waste Management Plans	Local waste plan should show Details of existing major disposal and recovery installations An assessment of the need for the closure of existing waste management facilities and the need for additional waste installation infrastructure	Preparation of up-to-date local plans including A statement covering future requirements, including replacement of time limited facilities, should be included in the final version of the plan. Existing and proposed waste management sites on a geographical map	Assessments of existing capacity and need for new capacity to meet the equivalent of waste arising in Surrey has been undertaken. Assessments of capacity and need for C, D & E and Hazardous wastes have also been carried out. The Plan is supported by the Aggregates Recycling Joint DPD which provides opportunities for the increased recycling of C, D & E waste. Sites proposed for allocation shown in Key Diagram and in larger scale Site Maps. All existing sites listed and kept up to date through the AMR.

Article	Requirement	How it might look	Compliance Assessment
	Sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations	Annual Monitoring Reports to include: - The location of any proposal that has received planning permission, and which is operational. - the number of permissions granted and the capacity of those additional facilities, or extensions of existing facilities; - sites that have been closed or have reached the end of their lifetime.	The Annual Monitoring Report gives information on new sites granted permission including location and an assessment of existing management capacity.
Article 34: Periodic Inspections	Carry out appropriate inspections of waste management facilities	Inspections are likely to occur either as part of any wider inspection to check compliance with the terms of the planning permission, or as part of an investigation of any allegation of a breach of planning control such as a failure to comply with planning conditions	The county council undertakes regular inspections of waste management facilities to ensure compliance with the terms of planning permissions. Allegations of breaches in planning control on authorised sites and on other sites are investigated and enforcement action taken as appropriate.

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