

Surrey County Council Waste planning

Surrey Waste Local plan

2018–2033

Regulation 18

Consultation:

Interim Summary Report

Version 0.1

April 2018

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Abbreviations and Acronyms

AMR	Annual Monitoring Report
AD	Anaerobic Digestion
AGLV	Area of Great Landscape Value
AHAP	Areas of High Archaeological Potential
ALC	Agricultural Land Classification
AONBs	Areas Of Outstanding Natural Beauty
AQ	Air Quality
AQIA	Air Quality Impact Assessment
AQMA	Air Quality Management Area
C,D & E	Construction, Demolition and Excavation
CRC	Community Recycling Centre
CSAI	County Sites of Archaeological Importance
DtC	Duty to Cooperate
DPD	Development Plan Document
EA	Environment Agency
EfW	Energy from Waste
EU	European Union
GIS	Geographic Information System
HRA	Habitats Regulation Assessment
LAA	Local Aggregates Assessment
LACW	Local Authority Collected Waste
LNR	Local Nature Reserve
MBF	Materials Bulking Facility
MGB	Metropolitan Green Belt
MRF	Materials Recovery Facility
MSW	Municipal Solid Waste

mtpa	millions tonnes per annum
NNR	National Nature Reserve
NPPF	National planning Policy Framework
NPPW	National planning Policy for Waste
RBF	Recyclables Bulking Facility
SAC	Special Area of Conservation
SFRA	Strategic Flood Risk Assessment
SPA	Special Protection Area
SPZ	Special Protection Zone
SSSI	Site of Specific Scientific Interest
STW	Sewage Treatment Works
SWLP	Surrey Waste Local Plan
tpa	tonnes per annum
WCA	Waste Collection Authority
WDA	Waste Disposal Authority
WFD	Waste Framework Directive
WPA	Waste planning Authority
WTS	Waste Transfer Station
WWTW	Waste Water Treatment Works

Executive Summary

- Between 1 November 2017 and 7 February 2018 Surrey County Council consulted on a draft Surrey Waste Local Plan (SWLP) and a number of supporting documents in accordance with Regulation 18 of the Town and County planning Regulations 2012.
- The Regulation 18 consultation on the draft SWLP was the main opportunity for stakeholders to influence the content of the new SWLP 2018. The draft SWLP sets out the strategic (spatial and policy) context for waste management and outlines the overall scale of need for additional waste management facilities in Surrey over the plan period.
- A wide range of media (newsletters, website, and twitter), correspondence and meetings was used to inform individuals and organisations about the new SWLP and seek their comments.
- Approximately 1,800 individuals and organisations were notified about the consultation by either letter or email.
- The responses were received as a mix of on-line responses, letters and emails.

Consultation results

- A total of 322 responses were received during the consultation: 266 responses submitted by individuals and 56 by organisations (waste industry, county, district & borough and parish councils, government bodies, community and environmental organisations).
- Generally, respondents supported the draft vision and the principles set out in the draft objectives. There was a recognition of the importance of waste management in supporting a healthy economy in Surrey and there was support for the aim of net self-sufficiency. There was particular support for the aspiration to increase prevention, re-use, recycling, and recovery of waste to minimise the amount of waste sent to landfill, though some felt the plan did not go far enough and there were concerns about management of waste by incineration.
- Support was expressed for policies in the plan. Amendments to the wording of policies were suggested by some respondents, including some Surrey districts and borough councils. Such amendments are sought to ensure the policies are effective and consistent with national policy.
- Comments that were made on the proposed sites in the plan mostly related to concerns on the potential impact of waste related development on residents, their quality of life and the environment. These included impacts on transport (in particular increased HGVs, noise, congestion, vehicle and pedestrian safety), visual intrusion, flood risk and air quality, as well as impacts on habitats and biodiversity.
- Concerns were raised that sites are situated within the Green Belt and highlighted the importance of adhering to national policy and the need for any development to demonstrate 'very special circumstances'. In addition, the deliverability of some of the sites was questioned.
- There was a strong desire for the county council to identify which facility types might be suitable at specific allocated sites. There was also a desire that the county council considers

the potential impact of any development at allocated sites in-combination with other types of proposed development nearby.

- Ten additional sites were nominated for inclusion in the plan and are listed in Appendix 3. All but one of these sites had previously been considered and rejected in the site identification and evaluation process. Following further consideration it is likely that none of the sites nominated will be carried forward for inclusion in the plan.
- There was strong support for partnership working including between Surrey County Council, district and borough councils and other authorities.
- Several Respondents noted that the plan seemed thorough and sound, though there were concerns that the documents were complex and that there was a large volume of content.

Next steps

- All the comments made have been considered and the plan will be refined in the light of these where appropriate. The next iteration of the SWLP, called the Submission Plan, will be produced for submission to the secretary of state in autumn 2018. A further round of consultation will be undertaken in autumn 2018 on the content of the Submission Plan accordance with Regulation 19 of the Town and Country planning Regulations 2012. An updated final version of this report will be published at that time.

If you have any questions about the consultation or you are having difficulty in accessing the documents please contact Surrey County Council:

Contact Us



Phone: 03456 009 009



Email: wasteplan@surreycc.gov.uk



**Letter: planning and Development Service,
Room 385 County Hall, Penrhyn Road,
Kingston upon Thames, KT1 2DW**

1 Introduction

1.1 Preparing a new surrey waste local plan

- 1.1.1 Waste management infrastructure is essential to support a modern economy. It is crucial that we plan for waste related development to ensure there are sufficient facilities to manage waste sustainably.
- 1.1.2 Waste local plans set out the planning framework for the development of waste management facilities and are used in determining planning applications for waste facilities. The current Surrey Waste Plan was adopted in 2008. Since it was adopted in 2008 a number of new challenges have arisen, including:
- Changes in the policy landscape and approaches to plan-making.
 - Evolution of waste management technologies and approaches.
 - Current and emerging local conditions including pressure to release allocated waste sites to alternative development.
 - Changes in patterns of waste production.
- 1.1.3 It is essential that the waste local plan is kept up to date to provide a robust policy framework to support the sustainable management of waste. The new Surrey Waste Local Plan (SWLP) will cover the period from 2018 to 2033 and will help to ensure that Surrey is able to provide sufficient waste management capacity and ensure waste is managed in the most sustainable way.

Figure 1 Key stages in delivering the Surrey Waste Local plan 2018 – 2033



1.1 Issues and Options Consultation

- 1.1.1 Between 2 September and 25 November 2016 Surrey County Council consulted on an 'Issues and Options Paper' as part of the preparation of the new Surrey Waste Local Plan.
- 1.1.2 The Issues and Options Paper sought views on the strategic context, the vision and the objectives for sustainable waste management in Surrey. These views were incorporated into the plan making process, and a Draft SWLP was produced.

1.2 Draft Surrey Waste Plan Consultation

- 1.2.1 Between 1 November 2017 and 7 February 2018 Surrey County Council consulted on a 'Draft Surrey Waste Local Plan'. The consultation sought views on the vision and objectives, spatial strategy, policies, sites and site identification process, environmental and sustainability report and on the WPAs Duty to Cooperate update statement. The Draft SWLP was comprised of the following main documents:
- Surrey Waste Local Plan: Draft Plan
 - Draft Waste Local Plan Annexe 1 - Shortlisted Sites
 - Draft Plan Non-Technical Summary
- 1.2.2 The main documents were supported by a number of background documents which were also made available on the council's website. These included:
- Types of Waste Management Facilities - Non Technical Explanation
 - Background Policy Paper No 5: Waste Needs Assessment
 - Background Policy Paper No 6: Site Identification and Evaluation Report
 - Background Policy Paper No 7: Delivery of Waste Management Capacity in Surrey 2008 - 2017
 - Background Policy Paper No 8: Duty to Cooperate Evidence of Engagement
 - Preferred Options - Vision and Objectives
 - Preferred Options - Spatial Strategy
 - Preferred Options – Policies
 - Issues and Options Summary of Responses Report
- 1.2.3 A second 'Search for suitable land' was carried out during the same period as the on the Draft SWLP consultation, which gave landowners and operators the opportunity to propose land that might be suitable for waste management, for allocation in the SWLP.
- 1.2.4 This document provides a **summary** of the responses received to the Regulation 18 consultation on the Draft SWLP. This is in accordance with the council's Statement of Community Involvement (adopted in 2015) (see Section 4.3).
- 1.2.5 This document sets out officers' initial views on the responses submitted and how the plan will be amended in the light of these. Fuller responses will be prepared in

light of further evidence gathering currently being undertaken and these will be published in an updated version of this document alongside the submission version of the new SWLP.

2 Summary of consultation undertaken (Draft SWLP)

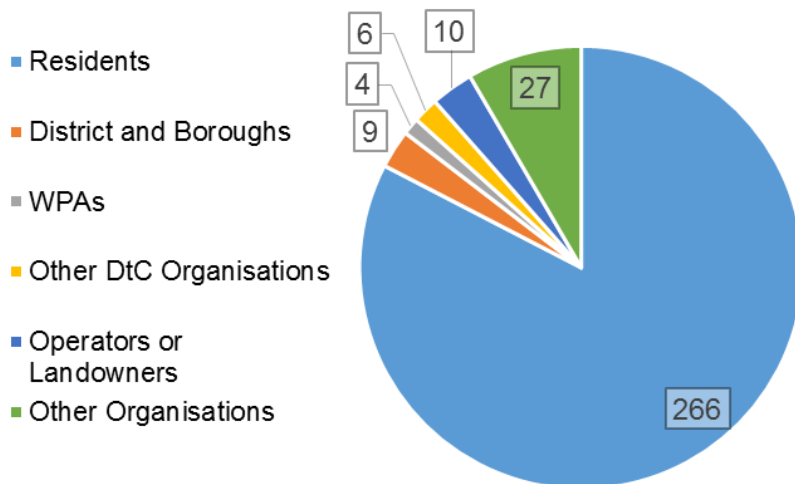
- 2.1.1 Surrey County Council used a wide range of media (newsletters, website, and twitter), correspondence and meetings to inform individuals and organisations about the Draft SWLP and to seek their comments.
- 2.1.2 The council's website supported the consultation through a dedicated webpage, including links to PDF copies of documents and a link to the online survey.
- 2.1.3 Notification was made at the start of the consultation to a wide range of individuals and organisation by either email or letter. Printed copies of the documents, along with flyers, were provided in the district and borough council offices and libraries.
- 2.1.4 Presentations were given at meetings with planning policy officers from Surrey's districts and boroughs.

3 Consultation Results

3.1 Overview

- 3.1.1 A total of 322 responses were received during the consultation; of which 266 were from the public (see Appendix 3 for a Map showing responses per borough and district).
- 3.1.2 Fifty six of these responses were received from organisations. This included 19 Duty to Cooperate (DtC) bodies and other agencies include; Historic England, Natural England, Transport for London (TfL), Surrey Hills Area of Outstanding Natural Beauty (AONB) Management Board, Thames Water, four Waste planning Authorities (WPAs) and nine Surrey district and borough councils. The list of those DtC bodies (and other Agencies) who responded is included in Appendix 2.
- 3.1.3 Ten responses were received from waste site operators and/or landowners. Fourteen parish councils and/or residents associations responded. The full breakdown of responses received by type of respondent is shown in Figure 2 below.

Figure 2 Number of Responses received by type of Respondent



- 3.1.4 The responses received during the consultation are set out in **Appendices 4 to 11**, alongside the response to each comment and any actions arising from these.

3.2 Vision, Objectives and Spatial Strategy

- 3.2.1 Comments made on the Vision, Objectives and Spatial Strategy of the SWLP related to:
 - Support for the county council's collaboration with relevant authorities, organisations and the local communities but some concern that it could do more.
 - Support for pushing management of waste up the waste hierarchy, including setting ambitious but realistic targets for recycling.

- Support for zero waste to landfill, where this does not increase waste managed by energy from waste (EfW) sites unnecessarily.

3.2.2 Further detail on the comments made on the vision, objectives and spatial strategy and the response to them are set out in Appendix 5.

3.3 Sites proposed for allocation

3.3.1 The SWLP proposes sites for allocation that are considered suitable for some form of waste related development. The comments made on these sites included concerns regarding:

- Potential detrimental impacts on the areas surrounding the sites resulting from waste related development. This included impacts on areas designated as being of environmental importance, schools and other sensitive receptors.
- Impacts on air quality, the transport network, visual amenity, flood risk, noise pollution, public health and general amenity in the area of the sites.

3.3.2 Comments supporting sites were also received.

3.3.3 Further detail on the comments submitted for the sites that are proposed for allocation in the SWLP and the response to these comments are set out in Appendix 6.

3.4 New sites

3.4.1 A second call for sites was undertaken concurrently with the Regulation 18 consultation on the Draft SWLP, where any respondent could nominate an area of land that they considered might be suitable for some form of waste management related development.

3.4.2 Ten sites were nominated during this second call for sites by landowners, operators and members of the public as land that should be considered for allocation in the SWLP. These are set out below.

1. Kitsmead Recycling Centre, Trumps Farm, Kitsmead Lane, Longcross, Chertsey
2. Homefield Recycling and Recovery Facility
3. Land at Addlestone Quarry, Byfleet Road, New Haw, Addlestone
4. Hirthermoor, Stanwell Moor, Stanwell, near Staines, Middlesex
5. Hays Bridge Farm, Brickhouse Lane, South Godstone
6. Britaniacrest/Little Orchard Farm - 26 Reigate Road, Hookwood,
7. Land adjacent to the A25 and A22 next to Streets Court
8. Dunsfold Park, Stovolds Hill, Cranleigh
9. Old Brick Works Capel
10. Land at the former airfield, Wisley

3.4.3 Each of these sites have been considered for allocation in the SWLP but at this stage are not proposed to be carried forward for inclusion in the plan. Further detail on each of the sites and the response to these nominations are set out in Appendix 7.

3.5 Policies

- 3.5.1 Comments made on the policies contained in the SWLP relate to:
- The specific wording of policies, including their effectiveness, with suggested amendments, additions and/or requests for greater clarity;
 - The preamble text for policies, specifically suggesting further detail be added;
 - Support or opposition for specific policies
- 3.5.2 Further detail on comments made on the Policies in the draft SWLP and the response to these comments are set out in Appendix 8.

3.6 Site Identification and Evaluation document

- 3.6.1 The Draft SWLP allocates sites that are considered suitable for some form of waste related development. The Site Identification and Evaluation document sets out the process that was used to identify and evaluate sites for inclusion in the Draft SWLP.
- 3.6.2 The comments made on the Site Identification and Evaluation document relate to:
- Specific sieves that were used to filter out unsuitable sites, particularly Sieve B – Established Industrial Estates and Business Parks and Sieve E – Former & Operational Mineral Workings and Land Allocated for Mineral Working Sites.
 - Specific issues that it was felt were left unconsidered during the Site Identification and Evaluation process.
- 3.6.3 Further detail on comments made on the Site Identification and Evaluation document and the response to these comments are set out in Appendix 9.

3.7 Views on the duty to cooperate

- 3.7.1 Section 33A of the planning and Compulsory Purchase Act 2004 (as amended) places a duty on local planning authorities (LPAs), in preparing local plans, to “engage constructively, actively and on an ongoing basis” with other relevant organisations to maximise the effectiveness with which plan preparation is undertaken.
- 3.7.2 Methods of implementing the duty to cooperate (DtC) are set out in both the National planning Policy Framework (NPPF) (2012) and the national planning Practice Guidance (nPPG) (2014). Under the DtC, local planning authorities are expected to work ‘collaboratively with other bodies to ensure that strategic priorities across local authority boundaries are properly coordinated and clearly reflected in local plans’ (paragraph 179 of the NPPF).
- 3.7.3 The DtC applies to specific bodies as set out in the relevant legislation and guidance. Section 110 of the Localism Act 2011, places a legal duty on local planning authorities to cooperate with one another; county councils and other prescribed bodies. Those prescribed bodies are identified in identified in Regulation 4 of The Town and Country planning (Local planning) (England) Regulations 2012 (as amended).

- 3.7.4 As part of preparing the new SWLP, the county council is seeking to take account of, and as appropriate align with, other planning policy (including emerging and updated). This includes minerals and waste plans from adjoining authorities, changes to national planning policy and other local (district or borough council and neighbourhood) plans.
- 3.7.5 In order to demonstrate how the council is discharging its duty, a 'Duty to Cooperate Evidence of Engagement' document was published for consultation alongside the Draft SWLP. This built upon the 'Duty to Cooperate Scoping Statement', which was consulted upon during the Issues and options Consultation between September and November 2016. The 'Duty to Cooperate Evidence of Engagement' document sets out the strategic matters on which Surrey County Council has identified during the preparation of the draft SWLP, how it has engaged with who, and when this took place. This document is being continuously updated and will be submitted to the Secretary of State alongside the submission version of the SWLP.
- 3.7.6 Further detail on comments made on the DtC and the response to these comments are in Appendix 4.

3.8 Other background documents

- 3.8.1 Comments were made on the following background documents which support the SWLP:
- Draft Plan Non-Technical Summary
 - Types of Waste Management Facility – A Non-Technical Explanation
 - Waste Needs Assessment
 - Preliminary Environmental and Sustainability Report
- 3.8.2 Further detail on comments made on the background document and the Waste Needs Assessment and the response to these comments are set out in Appendix 11.
- 3.8.3 Note that the comments made on the Preliminary Environmental and Sustainability Report are being analysed and will be published alongside the revised version of the document that will form part of the Submission Plan.

4 Consultation equality and diversity

4.1 Operators and landowners

- 4.1.1 Ten responses were received from site operators and/or landowners on the Draft SWLP.

4.2 Residents

Statement of Community Involvement

- 4.2.1 The Statement of Community Involvement (SCI) sets out how and when stakeholders can influence the content of new planning policy documents. The SCI sets out guiding principles for public engagement, including:
- Trying to involve everyone who may be affected by planning decisions
 - Using a range of methods to make it easy for people to respond
 - Having an open and transparent process
 - Managing expectations and providing feedback to respondents
- 4.2.2 The council identified a range of organisations and people who may be affected by planning decisions in Surrey in the SCI. These groups were contacted by email or letter, to all statutory organisations and other organisations or groups on our minerals and waste database.
- 4.2.3 The details of the consultation were widely distributed by a range of print and digital media to make sure that any organisations who did not receive a letter would be aware of the consultation. Any new organisations or individuals identified through the Draft SWLP Consultation will be added to the database where they have indicated they wish to be contacted in future.
- 4.2.4 The Draft SWLP Consultation was held between 1 November 2017 and 7 February 2018, a period of 12 weeks (including additional time for Christmas bank holidays). This is in line with the published SCI.
- 4.2.5 The SCI requires that consultation documents are published on the council's website with details of where and when paper copies of consultation documents can be viewed. The documents were published on a webpage for the new SWLP and made documents available at district and borough council offices.
- 4.2.6 Finally, the SCI requires the council to publish a summary of the results of consultations on our website. This document provides this summary and outlines the key issues and how the council has, or is, addressing them. Fuller responses will be prepared in light of further evidence gathering currently being undertaken and these will be published in an updated version of this document alongside the submission version of the new SWLP.

4.3 Overview of consultation equality and diversity

- 4.3.1 Over 300 representations were received in response to the public consultation.
- 4.3.2 The responses received were a mix of on-line responses, letters and emails. The majority of responses (96%) were submitted via the online consultation portal or by email, with only 4% of responses submitted in paper form.
- 4.3.3 There was a relatively even split between respondents in the age categories 35-49, 50-64 and >64. Fewer responses were received from the age groups <35.
- 4.3.4 The majority of respondents preferred not to disclose their gender (66%), however of those that did, 55% identified as male and 45% as female.

- 4.3.5 The ethnicity of the majority of respondents was White or White British (36%), followed by Asian or Asian British (2%). The remainder of respondents preferred not to indicate their ethnicity.
- 4.3.6 Disabled respondents made up 3% of the total responses. 37% responded indicated they did not have a disability and the remainder preferred not to say.
- 4.3.7 The majority of respondents indicated that they lived in Tandridge District, followed by Spelthorne Borough, then Reigate and Banstead Borough and Woking Borough. For a geographical distribution by borough/district see Appendix 3.
- 4.3.8 The next stage of the plan will update the equalities impact assessment to better understand the implications of the plan for different groups of the population.

5 Actions arising

- 5.1.1 Following close consideration of each of the comments received during the consultation on the Draft SWLP, appropriate changes that should be made to the SWLP and the need for further action has been identified. Appendices 4 to 11 document both the comments made and the resulting actions.
- 5.1.2 The SWLP will be revised in the light of these comments; the Waste Needs Assessment and Environmental and Sustainability Report will also be refreshed. This will result in a 'submission' version of the plan which will be taken to Cabinet for approval, and then submitted to the Secretary of State.
- 5.1.3 Technical assessment work is being undertaken to better understand the likely impacts of different types of waste related development at each of the sites allocated in the SWLP. This document will be updated to a final version once the assessment work is complete.
- 5.1.4 The consultation process, including the communications and publicity strategy, will be reviewed and the process of publishing the submission SWLP will take this into account.

Appendix 1 – Types of Consultees

Table 1 Types of consultees

Stakeholder type	Examples of who this included
Duty to Cooperate Bodies	<ul style="list-style-type: none"> • Surrey District and Borough Councils • Adjoining Local Authorities • Clinical Commissioning Groups • Other Waste planning Authorities • National Bodies and the Mayor of London • Transport bodies • Historic England • Natural England • The Environment Agency • Local Enterprise Partnerships • Surrey Local Nature Partnership
Other organisations	<ul style="list-style-type: none"> • Other Government Organisations • Surrey Wildlife Trust • National Trust • The Canal & River Trust • AONB Management Boards • Airports • Water Companies
Operators and Landowners	<ul style="list-style-type: none"> • Operators at existing sites • Any landowners who are interested in waste sites
Businesses	<ul style="list-style-type: none"> • Surrey Businesses
Residents	<ul style="list-style-type: none"> • Residents Associations • Neighbourhood planning groups • Voluntary organisations • Action Groups • Residents who previously responded to the

Issues and Options Consultation

- Residents who live within close proximity of a proposed site
- Sussex and Surrey Associations of Local Councils (SSALC)

Appendix 2 – Duty to Cooperate Bodies and other Organisations

Table 2 Duty to Cooperate Bodies who responded to the Regulation 18 Consultation

Organisation/Authority

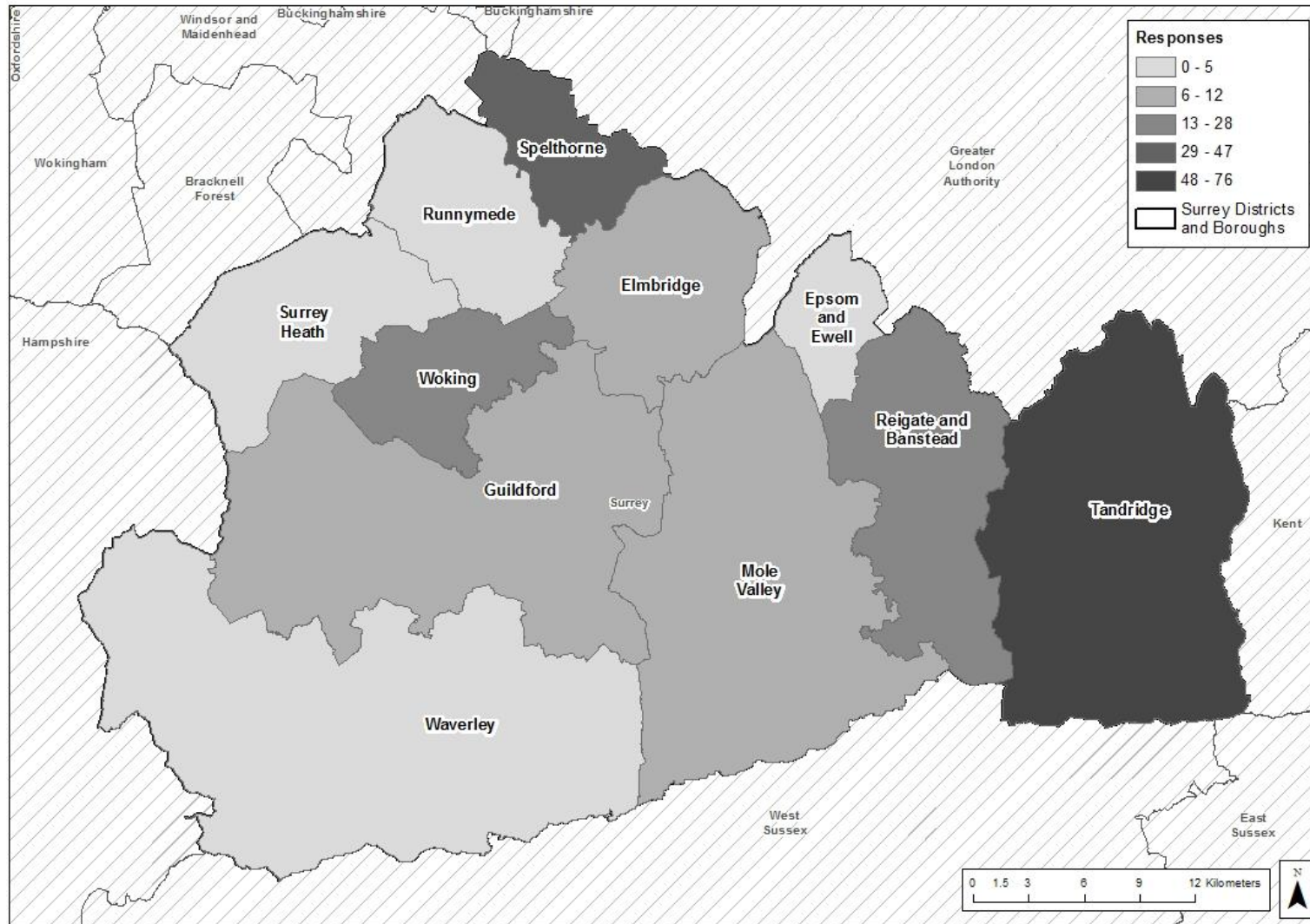
Coast to Capital LEP
East Sussex County Council
Elmbridge Borough Council
Gatwick Airport Limited
Guildford Borough Council
Hampshire County Council
Historic England
Kent County Council
London Borough of Richmond upon Thames
Mole Valley District Council
Natural England
On behalf of the Surrey Hills AONB Board
Reigate and Banstead District Council
Runnymede Borough Council
South London Waste Plan (LBs of Croydon, Kingston, Merton, Sutton)

Spelthorne Borough Council
Surrey Heath Borough Council
Surrey Nature Partnership
Tandridge District Council
Thames Water
Transport for London
Woking Borough Council

Table 3 Other organisations who responded to the Regulation 18 consultation

Surrey Hills AONB Board

Appendix 3 – Map of Resident Responses



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Appendix 4 – General Comments on the SWLP

Theme	Summary of Comments	Raised by	Response	Any action arising
Whole plan - General Comments	Concern that the plan should cover Surrey's waste, not imports from other areas	Residents and Lambs Holdings Ltd	As part of the Spatial Strategy, Surrey is aiming for net self-sufficiency in terms of waste treatment and disposal and as a result flows of waste will need to flow in and out of the county. Net self-sufficiency accepts that it is not practical to deal only with waste produced in Surrey and that cross-boundary waste movements, including those from London, will be necessary to support the viability and efficient operation of waste management facilities. (7.1.1)	No action arising
	Concern that the plan should make more reference to "sustainable economy"	Resident and Coast to Capital LEP	This suggestion is acknowledged. The vision incorporates sustainable waste management and sustainable development (5.2.2.) Under 8.2 Sustainable Waste Management, 8.2.2. describes a resource efficient economy as one where fewer resources are used to produce more, making the most of those resources by keeping them in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life.	Amend text in vision: "To enable sufficient sustainable waste management capacity to support Surrey's nationally important economy."
	Concern that the plan gives no indication of cost - so cannot be fully considered	Claygate Parish Council	To be found sound the plan must be 'deliverable' - amongst other things this means that its policies and proposals cannot impose such a financial burden that they would make it too expensive for development to come forward. This element of deliverability (as well as others) is tested through consultation with the waste industry.	No action arising
	Argue that the plan lacks consultation/transparency	Residents	This concern is acknowledged and would reassure residents that it is the council's priority to ensure local communities and members of the public are kept informed and are fully engaged throughout the preparation of the plan. We are reviewing how we engage with residents over consultations and will consider these comments in that process.	Review how we engage with residents over consultations.
	Argue for driving waste management up the waste hierarchy	WT Lamb Holding and EGAP Recycling	The plan's strategy is one of encouraging waste management further up the waste hierarchy (4.4.6). The SWLP provides updated targets for sustainable management of waste for the period up to 2033 which reflect the plan's vision and strategic objectives. These targets determine what type of waste management will be needed in the future. The targets encourage the management of waste further up the waste hierarchy (4.2.3).	No action arising.
	Development should follow a plan led system	W T Lambs Holding Ltd	This comment is acknowledged. Preparation of this plan will help enable development to follow a plan led system	No action arising.

Theme	Summary of Comments	Raised by	Response	Any action arising
	Concern that this plan has been prepared out of sync with district plans that are still being prepared and government policy e.g. NPPF	Cappagh Group Ltd and Residents	This plan has been prepared with cooperation of the district and borough councils who have clarified their expectations with regard to development in their areas - this collaborative working has been undertaken with the express intention of ensuring that there is no conflict between this plan and the district and borough local plan. At all stages of the plan we make sure we are following government policy.	Ongoing discussions with district and borough councils
	Concern that the plan is unsustainable and environmentally unsound	Resident	The plan has been drafted to be consistent with national policy concerning sustainability and protection of the environment. The plan is subject to sustainability appraisal (see draft Environmental and Sustainability Report) and takes account of any recommendations from this process.	No action arising
	Concern that the plan is unsound, is lacking in vision and will be ineffective in delivering its objectives	Cappagh Group Ltd and resident	This comment is acknowledged. It is considered that the policies of the plan (as amended) will be effective in ensuring the objectives are delivered.	The plan is being reviewed in the light of comments made in the consultation (Reg 18).
	Support for the plan - believe it is thorough	Surrey Nature Partners	The support for the draft plan is acknowledged.	No action arising
	There is a lack of consideration for the impacts that the plans will have on the local communities.	Residents	This concern is acknowledged and takes the impacts on local communities as a great importance. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc. The plan has been subject to SEA/Sustainability Appraisal. The site selection process considers a wide range of factors including community impact. Further assessment is being carried to establish the types of waste management facility that might be suitable for development at any of the sites proposed for allocation.	Assessment work and SEA/Sustainability Appraisal is being carried out to highlight any potential impacts on local communities. This work will highlight any negative impacts on local communities, which can then be addressed/mitigated.
	It was stated that some respondents could not find the documents.	Resident	It is s acknowledged that some respondents had difficulty locating the documents on our webpages. The council will look into this and try to improve the layout of our documents online to make it easier to identify each document. Surrey County Council will also remind respondents how they can contact the county council if they have any questions or difficulty accessing the documents.	Re-visit the webpages and try to put the documents into a clear layout to make the documents more accessible. Reiterate how respondents can contact Surrey County Council if struggling to open or locate the report.
	Concern that the plan does not comply with the NPPF	Resident	This concern is noted. The NPPF and National planning Policy for Waste (NPPW) is adhered to through the preparation of this plan. It provides guidance on how strategic planning matters should be addressed in local plans. Throughout the plan documents, the NPPF is referred to showing Surrey County Council has complied with the document. he plan will be publicly examined independently in due course to test compliance with national policy, and this must be demonstrated by the Council.	Evidence throughout all of the documents to show the NPPF has been referred to.

Appendix 5 - Vision, Objectives and Spatial Strategy

Theme	Summary of Comments	Raised by	Response	Any action arising
Section 9 Engagement / Strategic Objective 8 / 9.4 Community Engagement	Concern that there is not enough mention of engagement with the corporate community	Resident	This suggestion is acknowledged. The Statement of Community Involvement (SCI) sets out how Surrey County Council will involve local residents, local businesses and other key organisations and stakeholders in the plan-making process and in the determination of planning applications. Also see Policy 16. (9.4.1)	
Section 9 Engagement / Strategic Objective 8 / 9.4 Community Engagement	Supports the need for collaboration between authorities - there is a need for The council to work with its partners, borough and parish councils to consult with local communities	WT Lamb Holding Ltd, Hampshire County Council, Bisley Parish Council, London Borough of Richmond and South London Waste Plan	It is agreed and acknowledged that the support for this element of the draft plan	No action arising
Strategic Objective 2	Concern that no provision is made for further allocations in respect of construction, demolition & excavation (C,D & E) waste recycling facilities	EGAP Recycling Ltd	The plan states "the SWLP is generally supportive of C, D & E recycling in conjunction with operational mineral workings (4.5.3)... No allocations are proposed for C, D & E recycling facilities. This is because historically those facilities have come forward as temporary facilities in line with operational mineral workings. The council believes that this is likely to continue (4.6.3). Policy 3 addresses proposals for C&DE recycling and is appropriately supportive of such facilities.	No action arising.
Strategic Objective 2 / Strategic Objective 3	Oppose any additional incineration capacity, especially if the energy (heat) is not utilised	Residents and WT Lambs Holding Ltd	This comment is acknowledged. Incineration (with energy recovery) is an effective and widely used method of waste management. The plan states...policy is not technology specific so that the SWLP is able to react to new technologies that be developed in the future (8.2.5)...Generally the county council is supportive of recycling and recovery operations where it can be demonstrated that facilities will not have adverse effects of amenity or environment. The types of waste technology that will be suitable will depend on the nature and scale of the proposed scheme and the characteristics of the site and its surroundings (8.2.6).	Amend policy 1 to make it clear that proposals for recovery will need to include heat recovery unless there are special circumstances
Strategic Objective 2 / Strategic Objective 3	Disposal of non-inert waste to landfill should be explored further	Resident	The Disposal of non-inert waste has been adequately considered and is specifically addressed in the Waste Needs Assessment and covered by Policy 6.	No action arising.
Strategic Objective 2 /	Supports moving towards zero waste - but do not agree that additional incineration	Residents	This concern is noted. However, energy from waste is one of the waste management methods that the council have to plan for. Once full assessment work and modelling	Sites allocated in the plan are undergoing assessment work to

Theme	Summary of Comments	Raised by	Response	Any action arising
Strategic Objective 3	capacity has a part to play in this/ should not be based on incineration		has been carried out, the council will have a better picture of what the likely impacts would be of a worst case scenario waste facility at each site. This will enable us to see what types of waste facility will be suitable at each site. Once this stage has been reached, further information will be available about what waste facility could feasibly go at each site. The plan states...policy is not technology specific so that the SWLP is able to react to new technologies that be developed in the future (8.2.5)...Generally the county council is supportive of recycling and recovery operations where it can be demonstrated that facilities will not have adverse effects of amenity or environment. The types of waste technology that will be suitable will depend on the nature and scale of the proposed scheme and the characteristics of the site and its surroundings (8.2.6).	understand the impact of locating waste management facility types at each allocated site and whether EfW would or would not be suitable.
Strategic Objective 2 / Strategic Objective 3	Argues that there is an unnecessary emphasis on "zero waste to landfill" - risks pushing us towards incineration and that more consideration should be awarded to the biodegradable fractions of waste streams	Resident and Guildford Residents Association	The council acknowledge this concern. Zero waste to landfill is a target to ensure that waste to landfill is a last resort, once all other options have been exhausted. Incineration is an effective widely used type of waste management that must be considered. The plan states...policy is not technology specific so that the SWLP is able to react to new technologies that may be developed in the future (8.2.5)...Generally the county council is supportive of recycling and recovery operations where it can be demonstrated that facilities will not have adverse effects of amenity or environment. The types of waste technology that will be suitable will depend on the nature and scale of the proposed scheme and the characteristics of the site and its surroundings (8.2.6). Biodegradable waste is a component of household waste and commercial and industrial waste and is considered as part of the strategy for managing these waste streams. Proposals for separate management of food waste by composting and/or anaerobic digestion would be encouraged by Policy 1 of the plan.	No action arising.
Strategic Objective 1	Supports the goal of net self sufficiency	Resident, South London Waste Plan, East Sussex Council and Hampshire County Council	The support for this element of the draft plan is acknowledged.	No action arising.
Strategic Objective 2 / Strategic Objective 8	Argue that targets for recycling should be higher and the council should be issuing more encouragement. Concern over whether EU targets will still be in place post Brexit/ will we still be	Residents, CPRE Surrey, Capel Parish Council and Residents	This concern is acknowledged. However, recycling targets must be achievable and consider that current targets are also ambitious. The plan states: "Targets for recycling, recovery and composting are set out at EU level in the WFD (2008/98/EC), the European Commission Circular Economy Package. At the national level targets are referred to in the Waste Management Plan for England. Local targets include those in the JMWMS (Joint Municipal Waste Management Strategy). The draft version of the SWLP has calculated the need for waste infrastructure using	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	interested in following their directives		<p>targets which are the same or more ambitious than those above" (6.2.2).</p> <p>The policies (specifically Policies 2, 3, 4, 5) "contribute to sustainable development by helping minimise waste pollution by encouraging sustainable waste management in line with the waste hierarchy" (6.2.5).</p> <p>"To implement the SWLP the county council will work with its partners to support initiatives that help meet local targets for prevention and re-use, recycling and recovery and prioritise development of facilities which allow management of waste further up the waste hierarchy" (6.7.2).</p> <p>It is acknowledged that Brexit creates a degree of uncertainty with regard to targets and directives. However, until more information is available we are unable to incorporate potential changes to targets and directives in our plan.</p>	
Strategic Objective 4	Concern at the prospect of sites being extended or expanded	Resident	Where appropriate the extension and expansion of existing sites is generally more efficient than developing new facilities. All relevant policies of the plan apply equally to proposals for extended sites to ensure that unacceptable impacts will not occur.	No action arising.
Strategic Objective 4	Concern over strategic objective 6.3 and Policy 7 - is there a need to consider encroaching (non waste related development)	Hampshire County Council	Agree encroaching (non waste related development) should be considered.	Changes to text to be made to ensure that proposals (and decisions on them) for development proximate to a safeguarded facility take account of the existence of the facility.
Strategic Objective 4	Supports the safeguarding of existing waste sites against non waste development	EGAP Recycling Ltd and WT Lambs Holding Ltd	The support for this element of the draft plan is acknowledged.	No action arising.
Strategic Objective 5	Concern that inadequate consideration has been given to the Green Belt	Residents and Wonham Place RTM Ltd	The issue of development in the Green Belt is addressed by Policy 9, which states that proposals for new or improved waste management facilities will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist. The plan also states that: "It is not considered possible to meet the anticipated waste management needs of the county without developing waste management facilities on Green Belt land. The overarching need for waste management in Surrey combined with a lack of suitable alternative sites outside the Green Belt and the need to locate facilities close to sources of waste are reasons why it is considered that very special circumstances may exist allowing development within the Green Belt (8.7.4). Mineral development is not inappropriate development in the Green Belt, provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. Waste	No action arising.

Theme	Summary of Comments	Raised by	Response	Any action arising
			development which is related to the restoration of mineral sites can play a positive role in the objectives of the Green Belt. For example, restoration can result in a suitable after use of a site with opportunities for access to restored open countryside (8.7.5)."	
Strategic Objective 5	Concern over strategic objective 6.4 - It will be useful to have sites/areas identified - Perhaps reference Appendix 1 at this point	Hampshire County Council	Agree this objective needs to be reconsidered as it will be preferable to develop capacity on brownfield land outside the Green Belt than at the sites allocated in the Green Belt.	Amend Objective 5 and associated text.
Strategic Objective 5	Concern that not enough information has been provided on what will be going where and that existing sites are not necessarily suitable for new processes, thus it is important to determine what uses are proposed	Residents and CPRE Surrey	Once full assessment work and modelling has been carried out, the council will have a better picture of the types of facility that might be suitable for the sites proposed for allocation. This will enable us to see what types of waste facility will be suitable at each site. Once this stage has been reached, further information will be available about what waste facility could feasibly go at each site.	Carry out assessment work and updated Annex 1 to specify what types of facility would be suitable at each locations
Strategic Objective 5	Argues that objective 5 should be reworded to add "best and suitable" sites	Resident	The text of Strategic Objective 5 needs to be reconsidered in light of the fact that the majority of the allocated sites are within the Green Belt and it will be necessary for proposals for development in such locations to demonstrate that other non Green Belt sites, which would be more suitable, are not available.	Update text of Strategic Objective 5 and associated text
Strategic Objective 6	Concern that there is inadequate reference to landscape and environmental protection	Resident and Surrey Hills AONB Board	It is accepted that environmental protection is a key consideration. This is covered by Policy 14, which seeks to ensure that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and specifically references the appearance, quality and character of development in the landscape. Detailed technical assessment is being undertaken to better understand the likely impact of waste development at each of the sites and the potential implications upon the environment.	No action arising.
Strategic Objective 6	Concern that the plan is not workable when you consider issues surrounding the sites e.g. flooding, traffic, road disruption and proximity to houses	Residents	This matter is specifically covered by Policy 14, which seeks to ensure that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, including the general amenity. Policy 14 covers, flooding and proximity to houses. Further to this, Policy 15 covers traffic and road disruption.	No action arising.
Strategic Objective 6	Concern that air quality has not been given enough consideration	Residents	Air Quality considerations are covered by Strategic Objective 6 and addressed by Policy 14, which states that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, with specific reference to air quality.	No action arising.
Strategic Objective 6	Support the intention of objective 6 to achieve sustainable development of new waste management facilities and the specific reference to the historic	Historic England	The support for this element of the draft plan is acknowledged.	No action arising.

Theme	Summary of Comments	Raised by	Response	Any action arising
	environment in 8.9.4.			
Strategic Objective 6	Argue that more reference is needed to the Thames Basin SPA - particularly relevant due to their sensitivity to air quality	Guildford Residents Association	Habitats Regulation Assessment is being prepared that will take account of potential impacts on the Thames Basin Heath due to air quality. SPAs are covered by Policy 14, which states that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment and specifically highlights areas with biodiversity conservation interests, which SPAs would come under.	Update Annex 1 to reflect the outcomes of the Habitats Regulation Assessment
Strategic Objective 7	Concern that there are already too many HGV movement, any new development should have separate M25 access	Resident	This concern is acknowledged. Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Detailed Transport Assessment is being carried out, which will highlight specific issues regarding transport associated with development at any of the sites proposed for allocation.	Assessment work being carried out will highlight the potential impacts to traffic caused by development at the sites proposed for allocation.
Strategic Objective 7	Supports the use of rail networks over highways	W T Lamb Holding Ltd	The support for this element of the draft plan is acknowledged.	No action arising.
Vision	Argue that the vision needs supplementing with a fourth theme that treats waste as a range of resources	Guildford Residents Association	This is addressed in section 8.2 Sustainable Waste Management that states: "A resource efficient economy is one where fewer resources are used to produce more, making the most of those resources by keeping them in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life. This includes by preventing waste being generated in the first place (8.2.2)."	The authority will consider adding to the vision and make specific reference to waste being seen as a resource
Vision and Strategic Objectives - General	Argue that the scenario chosen is the worst for climate change and CO2 emissions	Residents and CPRE Surrey	However, this issue is addressed through Policies 13 and 15. Policy 13 states that planning permission for waste development will be granted where it can be demonstrated that development follows best practice for built design. And clearly sets out that all waste development should demonstrate that the development includes measures to minimise greenhouse gas emissions, including through energy efficiency and maximising the use of lower-carbon energy generation such as heat recovery and the recovery of energy from gas produced from the waste activity. Further to this, Policy 15 sets out that rail or water transportation should be considered and if unsuitable, vehicle movements associated with the development should be minimised, minimising emissions.	No action arising.
Vision and Strategic Objectives - General	Support the aims of the SWP	Ewhurst and Ellens Green Parish Council and Coast to	The support for this element of the draft plan is acknowledged.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
		Capital LEP		
Vision and Strategic Objectives - General	Concern that more regard needs to be given to the protection of AONB locations	Surrey Hills AONB Board	It is accepted that the protection of the AONB is a key consideration. This is covered by Policy 14, which seeks to ensure that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and specifically references the appearance, quality and character of development in the landscape, with regard to the AONB.	Surrey County Council will consider adding more reference to the AONB, specifically references to the appearance, quality and character of development in the landscape.
Vision and Strategic Objectives - General	Supports the goal to encourage residents and businesses to produce less waste, reuse, recycle and recover more waste	Woking Borough Council and Coast to Capital LEP	The support for this element of the draft plan is acknowledged.	No action arising.
Vision and Strategic Objectives - General	Argue that there has been little or no provision of how the vision/strategy will be maintained and not abused by other pressures	Resident	The vision and objectives are realised through implementation of the policies of the plan when decisions on planning applications for the development of waste management facilities are made.	No action arising.
Vision and Strategic Objectives - General	Argue that zero waste to landfill is unrealistic - vision should be reworded as a longer term strategy	Resident and WT Lambs Holding Ltd	This is deliberately aspirational. A component of the vision is 'to encourage residents and businesses to produce less waste and re-use, recycle and recover more waste'. The targets for diversion away from landfill shown in table 4, indicate 6%-0% by 2033 which is a longer term strategy. Para 8.5.1 recognises that Ddisposal of waste is "the least preferred option for waste management in the waste hierarchy, however it is an option Surrey County Council still need to plan for."	No action arising
Vision and Strategic Objectives - General	Argues that waste facilities are a vital provision for economic growth and the inclusion of them/plan for them is supported	WT Lamb Holding Ltd	The support for this element of the draft plan is acknowledged.	No action arising.
Vision and Strategic Objectives - General	Concern that one of the vision statements should be about environmental protection	Resident	This is covered by the third statement: To recognise the value of Surrey's environment and maintain the high standards of wellbeing enjoyed by our residents when permitting waste facilities.	No action arising.
Vision and Strategic Objectives - General	Concern over the third element of the vision - recognising the environment and maintaining the high level of wellbeing standards - how does increased pollution, fumes, HGVs, smell etc. lead to this?	Residents	This is addressed by Strategic Objective 6 and Policy 14 states that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment including the general amenity (covers fumes, smell etc.). This issue is also addressed by Policy 15, which states that planning permission for waste development will be granted where it can be demonstrated that vehicle movements associated with the	No action arising.

Theme	Summary of Comments	Raised by	Response	Any action arising
			development are minimised.	
Vision and Strategic Objectives - General	Argue that the revised vision is poorly structured	Resident	The council note this comment. The Vision is intended to set out the intended overarching outcomes arising from implementation of the plan.	No action arising
Vision and Strategic Objectives - General	Argue that the plan in its current state will not be able to "maintain the high standards of wellbeing enjoyed by its residents"	Resident	Unplanned development of waste management facilities would likely impact negatively on the high standards of wellbeing enjoyed by residents. The policies of the plan are drafted to ensure that communities are adversely impacted by waste development. Policy 14 states that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment including the general amenity (covers fumes, smell etc.). This issue is also addressed by Policy 15, which states that planning permission for waste development will be granted where it can be demonstrated that vehicle movements associated with the development are minimised.	No action arising.
Spatial Strategy	Concern over the spatial approach outlined in the SWLP and its inability to address Surrey's waste arisings, which are clearly not being met	Bridge Court Holding Ltd	It is noted that the spatial strategy reflects the geography of Surrey and of planning for waste on the basis of net self-sufficiency. The plan is intended to ensure that there will be sufficient capacity to manage an amount of waste that is equivalent to that arising in Surrey.	No action arising
	Concern that the plans are not consistent with government policies relating to the greenbelt	Residents	The approach to Green Belt is intended to be consistent with national policy.	Check that the policy is consistent with national policy on Green Belt.
	Concern that more should be being done to discourage single-use products and encourage reuse and recycling	Resident, CPRE Surrey and Guildford Residents Association	This comment is acknowledged and would like to provide assurances that it encourages reuse and recycling through its function as the Waste Disposal Authority for Surrey.	No action arising
	Supports the long term aims of the plan and suggests that they appear sustainable	Resident	The support for this element of the draft plan is acknowledged.	No action arising.
	Concern that there has not been enough mention or consideration of the AONB	Surrey Hills AONB Board	The protection of the AONB is a key consideration and this is covered by Policy 14, that seeks to ensure that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and specifically references the appearance, quality and character of development in the landscape, with regard to the AONB. [check consistent with proposed response to AONB board comments on policies]	Surrey County Council will consider adding more reference to the AONB, specifically references to the appearance, quality and character of development in

Theme	Summary of Comments	Raised by	Response	Any action arising
				the landscape.
	Concern that the report needs a well-structured summary	Residents	A separate non-technical Summary was provided.	Update non-technical summary
	Argues that existing sites should all be reviewed based on the consultation representations - in some cases there has been a change in circumstances (Sites Martyrs Lane)	New Zealand Golf Course	Each site is being reviewed with respect to consultation representations.	No action arising
	Concern that there has been no joined up thinking between the plans for housing and incinerators - Multiple sites where they could have been integrated within housing developments	Resident	Any proposals for waste management that would result in the utilisation of heat and energy in new housing development would be encouraged by policies of the plan.	Amend policy 1 to make it clear that proposals for recovery will need to include heat recovery unless there are special circumstances.
	Concern that there has been no specific allocation of sites for C,D and E recycling	Cappagh Group Ltd	Policy 3 addresses proposals for C, D & E recycling and states that planning permission will be granted where it meets certain criteria, and that development of new or improved C,D&E waste recycling operations located with other types of development will be supported where it can be demonstrated that there are benefits from the co-location. The SWLP is generally supportive of C, D & E recycling in conjunction with operational mineral workings (4.5.3)... No allocations are proposed for C, D & E recycling facilities. This is because historically those facilities have come forward as temporary facilities in line with operational mineral workings and the issue is also addressed in the council's adopted Aggregates Recycling Joint Development Plan Document. The WPA believes that this is likely to continue (4.6.3).	Provide a supporting document setting out the council's position on C,D & E waste
	Concern that relying solely on temporary facilities coming forward on mineral working sites is not considered a sound approach	Cappagh Group Ltd	No allocations are proposed for C, D & E recycling facilities because historically those facilities have come forward as temporary facilities in line with operational mineral workings and the issue is also addressed in the council's adopted Aggregates Recycling Joint Development Plan Document. The council believes that this is likely to continue.	No action arising
	Concern that there is no spatial strategy devised to take account of food waste	Resident	Food waste is a component of household waste and commercial and industrial waste and is considered as part of the strategy for managing these waste streams. Proposals for separate management of food waste by composting and/or anaerobic digestion would be encouraged by Policy 1 of the plan.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	Concern that there is no discussion of moving towards a circular economy	Resident	The plan recognises the EU Circular Economy Action Plan at paragraph 3.18. The plan is consistent with the Circular Economy principles.	Add text to show how the plan has a role in achieving a circular economy
	Argue that this document should be renamed and reformatted to become a 'County Resource Management Strategy' - less focused on disposal, more focused on recycling, reuse and prevention	Resident	The term 'resource' includes elements that the plan does not have a remit to plan for - for example minerals, water and energy - use of this term may therefore cause uncertainty regarding the scope of the plan.	No action arising
	Concern that there are significant flaws with the population projections for Guildford - there is a failure to include recordings of students returning home after their studies	Guildford Residents Association	The Waste Needs Assessment will be refreshed prior to the next stage of the plan to ensure that the data is as current as possible, a review of the methodology to ensure it is as robust as possible will also be undertaken.	Review population projections.
	Argue that waste streams need to be broken down by composition rather than simply origin	Guildford Residents Association	The approach of planning for waste based on its origin is consistent with planning Practice Guidance.	No action arising
	Concern that the plan is too focused on energy recovery rather than material recovery - Lack of attention/concern has been given to ensuring biodegradable material is directed to biological treatment	Guildford Residents Association	This is addressed by Policy 1 that is intended to ensure that waste is managed as far up the waste hierarchy as possible.	No action arising
	Concern that they would like to see a target of 100% biodegradable material/waste being reused or subject to biological treatment	Guildford Residents Association	This is addressed by Policy 1 that is intended to ensure that waste is managed as far up the waste hierarchy as possible.	No action arising
	Suggest that table 7 (4.4.2) should distinguish between thermal and biological recovery	Guildford Residents Association	The term 'other recovery' in this table encompasses biological treatment - this is explained in the text below the table.	No action arising
	Argue that they cannot accept that no sites are required for recycling	Guildford Residents Association	The Waste Needs Assessment established that sufficient recycling capacity exists. This takes account of the fact that some existing recycling facilities are not operating at full capacity. The development of new recycling capacity is supported by the plan.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	Argues that 6.2.7. should include an expectation that waste will be treated prior to landfill to ensure it is stable	Guildford Residents Association	This is addressed by paragraph 8.5.2 that states: "Sites for the disposal of non-inert waste to land are becoming more specialised. Waste sent to landfill should be the residue following other types of treatment such as recycling and recovery that cannot be dealt with in any other way" and Policy 6 that states: "planning permission for development involving disposal of waste to land operations will be granted where: i) The waste to be disposed of is the residue of a treatment process and cannot practicably and reasonably be re-used, recycled or recovered;"	No action arising
	Argue that the plan was not easy to understand	Residents	The council acknowledge this concern. We will review how we format and publish document, to avoid confusion in future consultations.	Review how we format and publish documents.
Spatial Context	Argue that figure 2 in the plan should show the Surrey Hills AONB	Surrey Hills AONB Board, Guildford Residents Association	The council welcomes this suggestion.	Add a layer to the map (Figure 2) to show the extent of the AONB in Surrey.

Appendix 6 – Sites proposed for allocation

Summary of Comments	Raised by	Response	Any action arising
Martyrs Lane			
Argues that the reuse or extension of an existing site (Martyrs Lane) is less likely to inconvenience nearby residents/businesses	Residents and Runnymede Borough Council	The council agrees and notes the support for this element of the draft plan	No action arising
Argues that Martyrs Lane is close to a town but away from most residential areas (out of the way)	Residents	The council agrees and notes the support for this element of the draft	No action arising
Concern that the Martyrs Lane site is within a rural setting and hence is inappropriate	Residents and New Zealand Golf Course	A desktop assessment of the site suggests that there are no features, that could be associated with the site's rural setting, that would be especially sensitive to development in this location however further assessment work is being undertaken to verify this position and to ensure that any development is of a scale, form and character appropriate to its location. Policy 14 of the plan states that planning permission would only be granted if it could be demonstrated that there would be no unacceptable impact on communities and the environment including on the landscape and any features that contribute to its distinctiveness; and on the natural environment, biodiversity and geological conservation interests including green infrastructure.	Update Annex 1 to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.
Concern that the Martyrs Lane site is within greenbelt and so is inappropriate	Residents, New Zealand Golf Course and The Chertsey Society	The Martyrs Lane site is located within the Green Belt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Green Belt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist. Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with	Annex 1 to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
<i>Martyrs Lane</i>			
		<p>Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.</p>	
<p>Concern that development at Martyrs Lane would create more traffic and move the existing road network even further over capacity and is too far from Junction 11 of the M25</p>	<p>Residents, Runnymede Borough Council, The Chertsey Society and Surrey Heath Borough Council</p>	<p>Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Before the draft plan goes any further, a detailed Transport Assessment will be carried out, which will assess the acceptability of the site, in terms of impacts on the highway network. This assessment will also highlight any concerns, which can then be addressed/mitigated against.</p>	<p>Annex 1 to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.</p>
<p>Concern that development at Martyrs Lane would result in a decrease in the quality of life of local residents</p>	<p>Residents</p>	<p>Any proposal for development of this site would need to be consistent with Policy 14 that seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health. Further assessment is being undertaken to assess potential for health impacts arising from development at this site.</p>	<p>Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.</p>
<p>Concern that noise pollution would occur if site were developed</p>	<p>Resident and New Zealand Golf Course</p>	<p>The relatively rural location of this site does mean that there are fewer receptors sensitive to noise which are proximate to this site. The potential for development at the site to cause nuisance due to noise would be considered and likely conditioned at the planning application stage. The potential for nuisance from noise is dealt with in Policy 14, which states that planning permission for waste development will be granted where it can demonstrate that there will not be an unacceptable</p>	<p>Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the</p>

Summary of Comments	Raised by	Response	Any action arising
Martyrs Lane			
		impact on communities and the environment in terms of noise.	assessment, which will need to be taken into account in any planning application for development at the site.
Concern that any development at Martyrs Lane will increase undesirable smells in the area	Resident	Waste management facilities can be operated in a manner that ensures nuisance caused by odour does not occur. Policy 14 will ensure that any proposals for development at this site would demonstrate that the development would not result in an unacceptable impact on communities and the environment due to odour. District and Borough Council environmental health controls will also help ensure that nuisance caused by odour does not occur.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure odour does not cause a nuisance to local sensitive receptors.
The Martyrs Lane site is located within close proximity to Horsell Common	Residents, the RSPB and Surrey Heath Borough Council	Protection of Horsell Common is in part provided for by Policy 14, which only allows development where it can be demonstrated that there will be no unacceptable impact on the natural environment, biodiversity and geological conservation interests including green infrastructure. Horsell Common as a SSSI, will of course be protected and impacts will, once identified, be minimised, if development is deemed appropriate and permission is granted.	Assessment work is being carried out which considers the potential impact on the surrounding area, in terms of landscape and visual impact, impact of air quality and impact on flood risk. The need to ensure protection of Horsell Common SSSI has been included in the key development requirements associated with the site in the updated Annex 1.
Development at Martyrs Lane will have a detrimental effect upon air quality/pollution in the local area	Residents, Surrey Heath Borough Council, The Chertsey Society and the RSPB	Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.
Concern that the site is not deliverable because of its inclusion in the 2008 plan and that it has not been developed.	Cappagh Group	This site was identified following a thorough process of site identification and evaluation including a new call for sites (as set out in the Site Identification and Evaluation Report). There is no evidence to suggest that this site cannot be practically delivered over the life of this plan though this is subject to further detailed technical assessment currently being undertaken. The plan includes a range of deliverable sites to provide certainty and flexibility in ensuring that waste management capacity requirements can be achieved.	Further detailed technical assessment will help assist in establishing whether proposed sites will be deliverable over the plan period.

Summary of Comments	Raised by	Response	Any action arising
Martyrs Lane			
Concern that development should not be encouraged at Martyrs Lane because it is not an established industrial area	Resident	This site was identified following a thorough process of site identification and evaluation including a new call for sites (as set out in the Site Identification and Evaluation Report). The site identification process did not identify any suitable industrial areas where there was certainty that new strategic waste management capacity could be delivered. However it is noted that it is generally preferable to develop existing industrial sites and the plan will be updated to make this clear. Indeed, for a proposal to be acceptable in this location it would be necessary to demonstrate that alternative suitable industrial sites are not available.	Text of plan to be amended to confirm that, if possible and practicable, suitable industrial land should be developed in preference to greenfield sites.
Concern that the Martyrs Lane site is unsuitable due to the width of Martyrs Lane and other roads in the surrounding area (Holloway Hill), making it unsuitable for HGVs and the potential for the road to be used as a cut through	Residents, New Zealand Golf Course, The Chertsey Society and Cappagh Group	The waste planning authority note that the increase in HGVs as a result of the development of a waste facility is a key concern for residents, businesses and people who frequently use the local road network. This has been implemented via Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment, which will need to be taken into account in any planning application for development at the site.
Concern that the proximity to residential properties of the Martyrs Lane site might mean it will be inadequately screened and cause visual intrusion	Residents and New Zealand Golf Course	Detailed landscape and visual impact assessment is being carried out to assess the potential impacts on visual amenity resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment including general amenity. The policy specifically references how the appearance of any development needs to be taken into account in any proposal, however an amendment is proposed to make it clear that impacts on 'general amenity' include those associated with visual amenity.	Annex 1 to be updated to include any specific key development management requirements concerning mitigation of impacts on visual amenity, identified by the assessment, which will need to be taken into account in any planning application for development at the site. Protection of visual amenity to be strengthened by amendments to Policy 14.

Summary of Comments	Raised by	Response	Any action arising
Martyrs Lane			
Concerns over the proximity of Martyrs Lane to Longcross Garden Village	Runnymede borough Council and The Chertsey Society	It is accepted that this a concern for many. Policy 14 addresses this where it states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development (The Garden village Proposal). And, in Policy 15, that states, planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would take into account the cumulative impact of traffic from both the waste development and the Garden village proposal.	Assessment work is being undertaken to enable us to better understand the potential impact upon the local road network of the cumulative impacts of both the developments. The results of this work will inform the next stage of the plan and will give the council a better understanding of the likely impacts on the surrounding transport network. This will enable us to identify issues and attempt to resolve, limit and/or mitigate their presence. Furthermore, the implications of development for transport are required to be assessed at the application stage. Development that is permitted could be subject to conditions on opening times and/or vehicle movements, thus minimising the disruption to the surrounding road network.
Concern that any development at Martyrs Lane would lead to increased vibrations	New Zealand Golf Course	The waste planning authority accept that increased vibrations will be a concern of residents and businesses. Policy 14 of the plan is intended to ensure that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, and this includes impacts caused by vibration. Policy 15, concerning the transport of waste, is intended to ensure that the use of HGVs is minimised and does not cause unacceptable impacts.	No arising actions.
Concern that development at Martyrs Lane would adversely impact users of the New Zealand Golf Course	New Zealand Golf Course	The waste planning authority note that many local residents and businesses are concerned about how their home/business will be affected. This is implemented through Policy 14, which states that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment. Further detailed assessment work is being undertaken, to ensure that Surrey CC is able to fully appreciate the impacts a waste development will have and to conclude what is and isn't suitable at each site. Following this, when a better picture of the likely impacts can be identified, the council will be able to attempt to resolve any impacts/mitigate against them. Annex 1 will be updated to require that any proposals for waste development in this location take account of the need to ensure that this would not result in unacceptable impacts on the golf course and its users.	Annex 1 to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.
Concern that development at Martyrs Lane	Residents,	It is accepted that impact to birds and wildlife is a key concern of many	Annex 1 to include any specific key development

Summary of Comments	Raised by	Response	Any action arising
Martyrs Lane			
would adversely impact bird and wildlife species and habitats	Natural England, New Zealand Golf Course, Surrey Heath Borough Council and the RSPB	residents and public bodies. Policy 14 sets out that planning permission will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests. Detailed technical assessment is being undertaken to better understand the likely impact of a waste development at Martyrs Lane and the potential implications it will have on bird and wildlife species and habitats. This work should enable the council to better understand what the likely impact upon the bird and wildlife species and habitats will be. This work may include Habitats Regulation Assessment to assess the impact of development on any European designated sites, thus the potential impacts will be closely studied to ensure any issues will be addressed/mitigated.	management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.
Land east of Martyrs Lane is being considered by Woking BC for safeguarding in its Site Allocations DPD for development.	Woking Borough Council	This matter has been subject to DtC discussions between officers of the two councils. The landowner has made it clear that, in the event of the land to the east of Martyrs Lane being safeguarded by the borough council to meet long term housing needs, then this would in effect supersede the waste allocation such that they would no longer wish the site to be progressed as a waste site.	Continue to liaise with Woking BC regarding allocation of this site for housing in the Woking Site Allocations DPD.
Concern over the Martyrs Lane sites' proximity to ancient woodland	Natural England	The waste planning authority accept that some are concerned with Martyrs Lane and the sites proximity to ancient woodland. The avoidance of unacceptable impacts on Ancient Woodland is dealt with through Policy 14, which sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes Ancient Woodland.	Annex 1 will be updated to make specific reference to the Ancient Woodland as a key development management matter to which any proposal for development will need to have particular regard.
Concerns over the proximity of the Martyrs Lane site to Chobham Common SPA	Resident and The Chertsey Society	It is accepted that impact to birds and wildlife is a key concern of many residents and public bodies. This is implemented via Policy 14, which sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests.	Assessment work will need to be undertaken to better understand the likely impact of a waste development at Martyrs Lane, this will to some extent include potential implications it will have on bird and wildlife species and habitats. Assessment work is being undertaken, including Sustainability Appraisal and Strategic Environmental Assessment, which together will form the Environment and Sustainability report. This work should enable the council to better understand what the likely impact will be. Further to this, a Habitats Regulation Assessment will be required to assess the impact of

Summary of Comments	Raised by	Response	Any action arising
<i>Martyrs Lane</i>			
			development on a European designated site, thus the potential impacts will be studied. Annex 1 to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.
Concern that any development at Martyrs Lane might reduce Surrey's recycling capacity	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising
Concern that the Martyrs Lane site is within a proposed biodiversity opportunity area	Surrey Nature Partners	This concern is noted. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14, which sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Assessment work being carried out will enable the council to better understand likely impacts at each site. Annex 1 will be updated to make specific reference to the proposed biodiversity opportunity area as this is a key development management matter to which any proposal for development will need to have particular regard.

Summary of Comments	Raised by	Response	Any action arising
<i>Land to the north east of Slyfield Industrial Estate, Guildford</i>			
Concern over the resultant smell of any development at the Slyfield site	Residents	This concern is noted. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities and the environment and lists odour as a key consideration.	No action arising
Concern over the resultant noise from any development at the Slyfield site	Residents	The relatively rural location of this site does mean that there are fewer receptors sensitive to noise which are proximate to this site. The potential for nuisance from noise is dealt with in Policy 14, which states that planning permission for waste development will be granted where it can demonstrate that there will not be an unacceptable impact on communities and the environment in terms of noise.	Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.
Argues that the site description needs to be amended - currently claims that Slyfield is undeveloped land - Incorrect, it is zone 3b floodplain	Resident	The council note that the site is mostly undeveloped, but includes two areas previously used for the landfilling of a range of waste materials (as in Annexe 1). It is noted that the majority of the site is classified as Zone 1 for fluvial flood risk and the southern part of the site is underlain by a Zone 3 SPZ designation (as in the Environmental and Sustainability Report).	Update Annexe 1 to reflect that the majority of the site is located in Zone 1 for fluvial flood risk and the southern part of the site is underlain by a Zone 3 SPZ designation (to reflect the Environmental and Sustainability Report Annex C4.E.2.4)
Concern over the Slyfield site being located in the greenbelt	Residents and Guildford Borough Council	As set out in Annexe 1, the majority of the site is urban land. A small area of the allocated site is within land designated as Green Belt. Any application for land within the Green Belt will need to demonstrate very special circumstances. Any application should demonstrate how it complies with Policy 9 and the NPPF.	No action arising
Concern over the Slyfield site being located on a floodplain	Residents	This concern is noted. We have already considered the flood risk and do not consider it is sufficient at this site to discount the Slyfield site as unsuitable. The issue of flood risk is covered by Policy 14, which states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, specifically in terms of flood risk.	Annexe 1 will be updated with the outcomes of a Strategic Flood Risk Assessment.
Concern over the Slyfield site having limited access	Resident	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment, which will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
<i>Land to the north east of Slyfield Industrial Estate, Guildford</i>			
		have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	
Concern that any development at the Slyfield site might reduce Surrey's recycling capacity	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising.
Concern that the Slyfield site is being proposed on already contaminated land	Residents	As set out in Annexe 1, the majority of the site is undeveloped, but does include two areas of previously used for the landfilling of a range of waste materials. Any development would have to consider contamination as part of their proposal and application. Policy 14 sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact relating to contamination of land or groundwater.	No action arising.
Concern over the Slyfields sites' proximity to ancient woodland	Natural England	It is accepted that some are concerned with the Slyfield site and the sites proximity to ancient woodland. The avoidance of unacceptable impacts on Ancient Woodland is dealt with through Policy 14, which sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes Ancient Woodland.	Annex 1 will be updated to make specific reference to the Ancient Woodland as a key development management matter to which any proposal for development will need to have particular regard.
Argue that existing roads and junction surrounding the sites should be improved	Residents	The council acknowledges these comments and highlight that in some cases the road network around sites is improved to mitigate impacts of the development or s106 money is provided that can support the local road infrastructure. Policy 15 states that development must ensure: there is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have an adverse impact on the safety of the highway network;	No action arising.
Concern that with regards to the Slyfield site, no new roads should be built, especially not across greenbelt or on a floodplain	Resident	The plan is allocating Slyfield as suitable for waste development and does not propose any new access.	No action arising.
Concern that any proposed development at the	Resident	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an	Annex 1 to include any specific key development management requirements, identified by the

Summary of Comments	Raised by	Response	Any action arising
<i>Land to the north east of Slyfield Industrial Estate, Guildford</i>			
Slyfield site will increase congestion in the area		unacceptable impact on the surrounding road network. Transport Assessment will be carried out, which will assess the acceptability of the site, in terms of impacts on the highway network. This assessment will also highlight any concerns, which can then be addressed/mitigated against.	assessment, which will need to be taken into account in any planning application for development at the site.
Concerns over the limited space around the Slyfield site	Chambers Runfold Plc	It is noted this concern but notes that the site has been included for allocation as it is considered capable of delivering adequate capacity to be seen as a potential strategic site.	No arising action
Concern over the Slyfield site being located within a biodiversity opportunity area	Surrey Nature Partners	The council note that the location of the Slyfield site within a proposed biodiversity opportunity area will be a concern for some. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14, which sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Assessment work being carried out will enable the council to better understand the issues and adjust the plan accordingly. Annex 1 will be updated to make reference to the proposed biodiversity opportunity area.

Summary of Comments	Raised by	Response	Any action arising
<i>Land to the west of Earlswood Sewage Treatment Works, Redhill</i>			
Concern that the Earlswood site is not deliverable, as it was included in the 2008 plan and it is not yet in use	Cappagh Group	This site was identified following a thorough process of site identification and evaluation including a new call for sites (as set out in the Site Identification and Evaluation Report). There is no evidence to suggest that this site cannot be practically delivered over the life of this plan. The plan includes a range of deliverable sites to provide certainty and flexibility in ensuring that waste management capacity requirements can be achieved.	No arising action
Concern that the Earlswood site is too close to schools	Resident	Policy 14 that states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development (schools). Policy 15, states planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would include those crossing roads.	Assessment work is being carried out to enable us to better understand the potential impact upon the local road network, which will inform the next stage of the plan. Annex 1 to be updated to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site. Should any development be permitted it could be subject to conditions on opening times and/or vehicle movements, thus minimising the disruption to the surrounding road network.
Concern that the Earlswood site is too close to a major hospital	Resident	Policy 14 that states planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, this would include the hospital. It is also dealt with through Policy 15, which states that planning permission will be granted where it can be demonstrated that vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network, minimising the impact of any development on the vehicle movements to and from the hospital, including emergency vehicles.	No action arising
Concern that the Earlswood site is too small to make it feasible	Resident and Salfords and Sidlow PC	The Earlswood site has been subject to the same series of sieves as all other sites. The site is considered to be capable of delivering the capacity required of a strategic site.	No action arising
Concern over the suitability of the Earlswood site because it is not close to a major source of waste	Salfords and Sidlow PC	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. The Earlswood site is located within Reigate and Banstead district which is a key population area. The proximity principle, which this concern relates to, is	Assessment work being carried out will highlight potential impacts to traffic in the area. Annex 1 to be updated to include any specific key development management requirements, identified by the assessment, which will need to be taken

Summary of Comments	Raised by	Response	Any action arising
Land to the west of Earlswood Sewage Treatment Works, Redhill			
		dealt with by our spatial strategy, which states that development should consider key areas and centres of growth and addresses the polycentric nature of Surrey's settlements by including a range of locations. The nature of these settlements means that there is no one major source of waste arising. Therefore, good transport links might be more important than being located within geographic proximity to key centres. Thus, creating a need for a network of connected sites, able to enable the efficient management of waste.	into account in any planning application for development at the site.
Concern that with reference to the Earlswood site, the plan should clearly state that the site is directly adjacent to a site of Nature Conservation Importance and a Local Nature Reserve - any development should be designed not to have a negative impact on these designations	Reigate and Banstead District Council	The council note that the impact of the development on the environment is a key concern for many. This is dealt with through Policy 14, that sets out that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and specifically makes reference to minimising impact on the natural environment.	Assessment work being carried out will enable the council to better understand the issues and adjust the plan accordingly. Assessment work is being undertaken that should enable the council to fully understand the likely impact that a waste development will have on the surrounding area. Annex 1 to be updated to include any specific key development management requirements, identified by the assessment, which will need to be taken into account in any planning application for development at the site.
Concern that the plan should be more explicit that potential effects on nearby residents in terms of noise, air quality, odours etc. should not reach unacceptable levels for residents of nearby properties	Reigate and Banstead District Council	Assessment work will be carried out to identify potential impacts to nearby residents. Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include any specific key development management requirements to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.
Concern that the Earlswood site may have a negative impact on the surrounding area because of the visual intrusion it might cause	Resident	Work is being undertaken to assess the potential for impacts on visual amenity which will highlight any potential negative consequences, allowing them to be properly addressed/mitigated. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities and the environment, and specifically references the appearance of any development, thus aiming to minimise the extent of visual intrusion. Policy 13 is intended to ensure that development is of a scale, form and character appropriate to its location.	Update Annex 1 to reflect the outcomes from the Landscape and Visual Impact Assessment.
Concern that any development at the Earlswood	Residents	It is accepted that impact upon the environment is a key concern of many	Annex 1 to include any specific key development

Summary of Comments	Raised by	Response	Any action arising
Land to the west of Earlswood Sewage Treatment Works, Redhill			
site will have a negative impact on the Earlswood Lakes and the surrounding area		residents. Policy 14 sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests. Technical assessment is being undertaken to better understand the likely impact of a waste development at the Earlswood site and the potential implications upon the environment.	management requirements, identified by the assessment work.
Argue that the Earlswood site is a suitable location	Residents	The council agrees and notes the support for this element of the draft plan	No action arising
Concern that the development of the Earlswood site will have a negative impact upon air pollution and exacerbate an existing problem	Residents	Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site for different types and scales of development. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.
Concerns over any development at the Earlswood site that might result in an increase in cars/HGVs along Wood Hatch Road and Maple Road	Residents	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Transport Assessment is being undertaken, which will assess the acceptability of the site, in terms of impacts on the highway network. This assessment will also highlight any concerns, which can then be addressed/mitigated.	Annex 1 to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concern over development at the Earlswood site leading to an increase in the risk of an accident occurring/ a deterioration of safety	Residents	Policy 14 states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development. Policy 15 states planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would include those crossing roads.	A Transport Assessment is being undertaken, to enable us to better understand the potential impact upon the local road network. This work should enable the council to get a better understanding of what the likely impacts will be on the surrounding transport network. Update Annex 1 with the outcomes of the TA.
Concern that development on the Earlswood site would be inappropriate because of the sites	Resident and Salfords and	The Earlswood site is located within the Green Belt, however, development could be permitted here under 'very special circumstances'	Annex 1 to include any specific key development management requirements, identified by the

Summary of Comments	Raised by	Response	Any action arising
Land to the west of Earlswood Sewage Treatment Works, Redhill			
location within the Green Belt	Sidlow PC	<p>- in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Greenbelt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.</p>	assessment work that will need to be taken into account in any planning application for development at the site.
Concern that development on the Earlswood site would be inappropriate due to the proximity of the site to residential areas	Residents	Any proposal for development of this site would need to be consistent with Policy 14 that seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health. Further assessment is being undertaken to assess potential for health impacts arising from development at this site.	Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
<i>Land to the west of Earlswood Sewage Treatment Works, Redhill</i>			
Concern that development at the Earlswood site will create increased smells (both at present and in the future), which would be undesirable for local residents	Residents	Waste management facilities can be operated in a manner that ensures nuisance caused by odour does not occur. Policy 14 will ensure that any proposals for development at this site would demonstrate that the development would not result in an unacceptable impact on communities and the environment due to odour.	No action arising
Concern that the Earlswood site would be inappropriate due to poor access to the site	Resident, Cappagh Group and Salfords and Sidlow PC	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site for different types and scales of waste related development. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concern that any development of the Earlswood site would lead to increased noise pollution	Residents	The relatively rural location of this site does mean that there are fewer receptors sensitive to noise which are proximate to this site. The potential for nuisance from noise is dealt with in Policy 14, which states that planning permission for waste development will be granted where it can demonstrate that there will not be an unacceptable impact on communities and the environment in terms of noise.	Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application.
Concern that any development at the Earlswood site will lead to a detrimental decrease in house prices in the local area	Resident	Whilst the plan makes no provision to stop any house price decrease it does, through Policy 14, state that planning permission will only be granted where it can be demonstrated that there will not be an unacceptable impact on communities and environment, including a range of considerations, specifically the general amenity.	No action arising.
Concern that the proposed development at Earlswood might reduce recycling capacity	Residents	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the	No action arising.

Summary of Comments	Raised by	Response	Any action arising
<i>Land to the west of Earlswood Sewage Treatment Works, Redhill</i>			
		management of waste by increasing recycling.	
Concern that the proposed site at Earlswood is partly within a biodiversity opportunity area	Resident	This concern is noted. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Assessment work being carried out will enable the council to better understand the issues and adjust the plan accordingly. Annex 1 will be updated to make specific reference to the proposed biodiversity opportunity area as this is a key development management matter to which any proposal for development will need to have particular regard.

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead</i>			
Concern over the deliverability of the Leatherhead site, as it was named in the 2008 plan and is not in use yet. Further to this, Sita and Grundons already have sites in the vicinity, raise the argument that Addlestone Quarry is a more deliverable site	Cappagh Group	This site was identified following a thorough process of site identification and evaluation including a new call for sites (as set out in the Site Identification and Evaluation Report). There is no evidence to suggest that this site cannot be practically delivered over the life of this plan though this is subject to further detailed technical assessment currently being undertaken. The plan includes a range of deliverable sites to provide certainty and flexibility in ensuring that waste management capacity requirements can be achieved.	Further detailed technical assessment will help assist in establishing whether proposed sites will be deliverable over the plan period.
Concern over what type of waste development is being proposed at the Leatherhead site	Mole Valley District Council	Once full assessment work and modelling has been carried out, the council will have a better picture of what the likely impacts of different types of development would be at each site. This will enable us to determine which facility types are likely to be suitable at each site and if appropriate, what development criteria should be set to help mitigate any impact.	Update Annexe 1 with the outcomes of assessment work.
Concern that the proposed site at Leatherhead would be unsuitable because of its location within the Green Belt	Residents	<p>The Leatherhead site is located within the Green Belt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Green Belt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p>	No action arising

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead</i>			
		b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.	
Concern that the proposed site at Leatherhead would increase carbon emission and air pollution in the area	Residents	Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from potential waste management development in this location. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated with the outcomes of the AQIA.
Concern that development at the Leatherhead site would lead to a deterioration in road surface quality due to an increase in HGV movements	Resident	This concern is noted. Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concern that any development at the Leatherhead site might have the negative impact of reducing Surrey's recycling capacity	Residents	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising
Concern that any development at the Leatherhead site might be inappropriate due to the proximity of the site to residential areas	Residents	Any proposal for development of this site would need to be consistent with Policy 14 that seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health. Further assessment is being undertaken to assess potential for health impacts arising from development at this site.	Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead</i>			
			management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Argues that development at the Leatherhead site would be favourable as it is an existing site and so should be less disruptive	Resident	The council agrees and notes the support for this element of the draft plan	No action arising
Concern that any development at the Leatherhead site may lead to a decrease in the air quality in the surrounding area	Residents	Air Quality Impact Assessment is being carried out to assess the likely impacts on air quality arising from emissions resulting from potential waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.
Concern that the development at the Leatherhead site would be inappropriate because of the site being adjacent to a biodiversity opportunity area	Natural England	This concern is noted. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Annex 1 will be updated to make specific reference to the proposed biodiversity opportunity area as this is a key development management matter to which any proposal for development will need to have particular regard.
Argues that more recycling would be preferable to development at the Leatherhead site	Residents	The Waste Needs Assessment identifies the need for different types of waste management facility in the county up until 2033 and identifies that there is no net capacity gap for recycling facilities. Regarding the suitability of particular sites for specific waste management facility types, the county council are assessing the suitability of each site for different types of facility and the next iteration of the plan will identify facility types that may not be suitable at particular sites. Lastly, the development proposals that come forward at any site will be market led.	No action arising

Summary of Comments	Raised by	Response	Any action arising
Land at Lambs Business Park, Terra Cotta Road, South Godstone			
Concern that the Lambs site is too near to the proposed "New village"	Residents and Godstone Parish Council	This is dealt with through Policy 14 that states planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, this would include the new housing development and any cumulative impacts resulting from both the housing and waste development. It is also dealt with through Policy 15, which states that planning permission will be granted where it can be demonstrated that vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network, minimising the impact of any development on the vehicle movements to and from the site and the cumulative amount of vehicles from both the housing and waste development. Any waste related development will be assessed in combination with other development, both as part of the Waste Local Plan and at the application stage.	Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site. Continue to liaise with Tandridge District Council.
Concern that the Lambs site will lead to increased traffic, potentially pushing the local road network over capacity	Residents, Wonham Place Ltd, South Godstone Residents Association, Godstone Parish Council, Oxsted and Limpsfield Residents Group, Tandridge Lane Action Group and Chambers Runfold Plc	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Transport Assessment is being carried out, which will assess the acceptability of the site, in terms of impacts on the highway network. This assessment will also highlight any concerns, which can then be addressed/mitigated against.	Transport Assessment of the site. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concern that any proposed development at Lambs might lead to increased air pollution in the area	Residents, South Godstone Residents Association, Godstone Parish Council, Oxsted and Limpsfield Residents Group and	Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.

Summary of Comments	Raised by	Response	Any action arising
Land at Lambs Business Park, Terra Cotta Road, South Godstone			
	Tandridge Lane Action Group	they do not cause harm to human health.	
Concern that development at Lambs might lead to increased noise pollution	Residents and Oxsted and Limpsfield Residents Group	The relatively rural location of this site does mean that there are fewer receptors sensitive to noise which are proximate to this site. The potential for development at the site to cause nuisance due to noise would be considered and likely conditioned at the planning application stage. The potential for nuisance from noise is dealt with in Policy 14, which states that planning permission for waste development will be granted where it can demonstrate that there will not be an unacceptable impact on communities and the environment in terms of noise.	Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Argue that Godstone shouldn't have to deal with waste from elsewhere at the Lambs site	Residents	This view is acknowledged, however, as part of the Spatial Strategy, Surrey is aiming for net self-sufficiency in terms of waste treatment and disposal and as a result flows of waste will need to flow in and out of the county. Net self-sufficiency accepts that it is not practical to deal only with waste produced in Surrey and that cross-boundary waste movements, including those from London, will be necessary to support the viability and efficient operation of waste management facilities. (7.1.1)	No action arising
Concern that any development at the Lambs site would be inappropriate because of the state of Tilburstow Hill Road and the assumption that it will only get worse with increased HGV movements	Residents, Wonham Place Ltd, South Godstone Residents Association, Godstone Parish Council, Oxsted and Limpsfield Residents Group and Tandridge Lane Action Group	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site for different types and scales of waste related development. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concern that the D395 (Lambs site) is an entirely	Residents	A transport assessment is being undertaken to assess the suitability of	Update Annex 1 with outcomes of Transport

Summary of Comments	Raised by	Response	Any action arising
Land at Lambs Business Park, Terra Cotta Road, South Godstone			
unsuitable road		accessing the site by road. The potential availability of rail access is an advantage and may need to be exploited to make any waste use acceptable in transport terms.	Assessment.
Concern over the suitability of the Lambs site because of its location within the Green Belt	Residents, Wonham Place Ltd, South Godstone Residents Association, Godstone Parish Council and Chambers Runfold Plc	<p>The site is located within the Green Belt, however, the whole site is identified by the district council for employment use in the Local Plan Site Consultation and would thus be taken out of the Green Belt.</p> <p>If retained in the Green Belt development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Green Belt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.</p>	<p>Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.</p> <p>Continue to liaise with the district council regarding the local plan site allocation for employment use.</p>
Concern over the deterioration of safety/ risk of accident occurring	Residents	This concern is acknowledged. Policy 14 states that planning permission will be granted where it can be demonstrated that there will not be an	A Transport Assessment is being undertaken, to enable us to better understand the potential impact

Summary of Comments	Raised by	Response	Any action arising
<i>Land at Lambs Business Park, Terra Cotta Road, South Godstone</i>			
		unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development. Policy 15 states planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would include those crossing roads.	of waste related development upon the local road network, which will inform the next stage of the plan. Update Annexe 1 with outcomes of TA.
Concern over the suitability of the Lambs site because of the rail line being overstretched and at capacity	Residents and South Godstone Residents Association	This concern is noted. Any application would be assessed against Policy 15, which states that planning permission will be granted where it can be demonstrated that where practical and economically viable, the development makes use of rail or water for the transportation of materials to and from the site or links are adequate to serve the development or can be improved to an appropriate standard and where this cannot be achieved road transport is considered.	The county council is undertaking Transport Assessment work for each of the allocated sites to better understand the impact of waste related development on the surrounding transport network. Update Annexe 1 with outcomes of TA.
Site Brief SPG (para. 4.2.13 Lambs Business Park) The site would depend on all waste being imported by rail, which means bulk delivery and links to railheads. This is not impossible, it is clear that access constraints would make this difficult and complicated to develop Lambs Business Park.	Chambers Runfold Plc	This comment is acknowledged. Transport Assessment is currently being undertaken to assess suitability of site for different types and scales of waste related development in transport terms.	Update Annex 1 to take account of findings of transport assessment and confirm the accessibility of the site by road.
Concern over the suitability of the Lambs site because of the risk of increased vibrations effecting local residents and businesses	Residents	Policy 14 of the plan is intended to ensure that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, and this includes impacts caused by vibration. Policy 15, concerning the transport of waste, is intended to ensure that the use of HGVs is minimised and does not cause unacceptable impacts. Any application would be required to demonstrate how they comply with these policies.	No action arising.
Concern over the proposed development at Lambs because of the risk of undesirable smells being generated	Residents	Waste management facilities can be operated in a manner that ensures nuisance caused by odour does not occur. Policy 14 will ensure that any proposals for development at this site would demonstrate that the development would not result in an unacceptable impact on communities and the environment due to odour. District and Borough Council environmental health controls will also help ensure that nuisance caused by odour does not occur.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure odour does not cause a nuisance to local sensitive receptors.
Concern over the suitability of the Lambs site	Residents,	The council note that impact upon the environment is a key concern of	Annex 1 to include any specific key development

Summary of Comments	Raised by	Response	Any action arising
Land at Lambs Business Park, Terra Cotta Road, South Godstone			
because of the fear that any development might result in a negative impact to the surrounding environment	Godstone Parish Council, Oxsted and Limpsfield Residents Group, Tandridge Lane Action Group and EGAP Recycling Ltd	residents. Policy 14 sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests. Detailed technical assessment is being undertaken to better understand the likely impact of a waste development at the Earlswood site and the potential implications upon the environment.	management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concern over any further development at the Lambs site because of the risk of visibility of said development either from surrounding properties or viewpoints	Residents and Oxsted and Limpsfield Residents Group	Work is being undertaken to specifically assess the potential for impacts on visual amenity which will highlight any potential negative consequences. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities and the environment, and specifically references the appearance of any development, thus aiming to minimise the extent of visual intrusion. Policy 13 is intended to ensure that development is of a scale, form and character appropriate to its location.	Assessment work being carried out will highlight the visual impact of any potential waste related development. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concern over the lack of reference to the Tandridge emerging plan and our recent Garden Village consultation, with regards to the Lambs site	Tandridge District Council and WT Lamb Holding Ltd	This concern is noted. We would like to reassure districts and boroughs that their plans have been taken into account and will continue to be taken into account.	Continue to liaise with Tandridge District Council and include appropriate wording in the new SWLP. Assessment work being carried out currently will enable the council to better understand the in combination impacts.
Concern that Lambs Business park should be trying to grow it's small business appeal	Resident	As the council does not own or run the site, it has no influence over the business intentions of the site, as it is market led.	No action arising.
Concern over the suitability of the Lambs site because it is supposed to be categorized for potential for further employment	Residents and Tandridge District Council	The site is identified as a Major Developed Site in the Green Belt in the adopted Tandridge District Core Strategy. It is further proposed to be allocated in the emerging local plan as a strategic employment site. In principal there is no conflict with a proposed waste use which is an employment use.	Continue to liaise with the district council.
Concerns over the prospect of development at the Lambs site because of the impact development might have on horse riders using the bridleways that are within close proximity to the site	Residents and Godstone Parish Council	This concern is noted. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc. Policy 14 also seeks to ensure that planning permission will be granted there it can be demonstrated that there will not be an unacceptable impact upon the natural environment, the appearance, quality and character of the landscape and on public open space, the rights of way network and outdoor	Assessment work being carried out will highlight the worst case scenario of any visual impact of any of the developments, which will inform the next stage of the plan. Assessment work will be carried out, specifically the Landscape and Visual Impact assessment, which will highlight any potential negative consequences, allowing them to be

Summary of Comments	Raised by	Response	Any action arising
Land at Lambs Business Park, Terra Cotta Road, South Godstone			
		recreation facilities (horse riding and bridle paths).	addressed/mitigated.
Argue that Bletchingley Railway tunnel, within 360m of the site - should any waste material get into the tunnel, it will have serious implications on the railway	Godstone Parish Council	These comments are acknowledged. This issue would be addressed at the planning application stage but waste transported by rail generally occurs in sealed containers.	No action arising
Concern that the railway bridge immediately adjacent to Lambs is a restricted bridge - over height vehicles can block it	Godstone Parish Council	These comments are acknowledged. Transport Assessment work being undertaken will address this issue. The Transport Assessment will give an indication of likely vehicle routing and will take into account that some routes may not be suitable for HGVs.	Update Annexe 1 with outcomes of TA.
Argue that proximity to houses and other activities should be considered further	Godstone Parish Council	The council acknowledges these comments and would suggest that policy 14 sufficiently covers the impact on residential and other activities.	Update Annex 1 to include mention of site specific matters that would need to be addressed at the planning application stage.
Concern that before any further development, the council must reinforce conditions placed on Operating Licences using Lambs	Godstone Parish Council	These comments are acknowledged. This an issue for enforcement who are not aware of any current breaches. This is a operational matter that does not affect the in-principle allocation of this site in the plan as suitable for waste management development.	No action arising
Argue that flood defences need to be included in any evaluation of the area (assuming lambs)	Godstone Parish Council	The risk of flooding affecting development of the site is being assessed through a SFRA. This will identify what is acceptable on the site in terms of flood risk.	Update Annex 1 to include mention of site specific matters concerning flood risk that would need to be addressed at the planning application stage.
Concern that planning permission for the rail siding at Lambs Brickworks was granted for the sole purpose of reclaiming the claypits - Rail siding should be removed as per the planning permission conditions once the reclamation is complete - the rail siding is not there for waste management purposes	Resident	These comments are acknowledged. The rail siding represents an opportunity to provide sustainable waste transport by rail, this is preferable to transport by road.	No action arising
Concerns over the prospect of development at the Lambs site because of the impact development might have on community cohesion	Residents and Chambers Runfold Plc	This concern is noted. Policy 14 addresses this issue, which states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the community. This issue might also be addressed by Policy 16, which states that planning permission for waste development will be granted where it is demonstrated that the applicant has undertaken suitable steps with the local community before submitting their application.	No action arising
Generic opposition to any development at Lambs	Residents	This concern is noted. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust,	No action arising.

Summary of Comments	Raised by	Response	Any action arising
<i>Land at Lambs Business Park, Terra Cotta Road, South Godstone</i>			
		fumes, odour, vibration, illumination etc.	
Concerns over the prospect of further development at the Lambs site because of the fear that waste facilities might encourage gulls to come to the area and this would have a detrimental effect on local bird populations	Residents	This concern is noted. Policy 14 seeks to ensure that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment. Where appropriate this issue can be dealt with through planning conditions at the application stage, requiring that steps are taken to prevent this occurring.	No action arising.
Concerns over the suitability of the Lambs site because of the proposed sites proximity to ancient woodland	Natural England	This concern is noted. The avoidance of unacceptable impacts on Ancient Woodland is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, and this specifically includes Ancient Woodland.	Annex 1 will be updated to make specific reference to the Ancient Woodland as a key development management matter to which any proposal for development will need to have particular regard.
Concerns over further development of the Lambs site because of the risk it might limit Surrey's capacity for recycling	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising.
The policy should make specific mention to the use of the rail head at Lambs Business Park	Tandridge DC	Proper consideration of the use of the railhead would be required by Policy 15.	Consider change in policy to reflect use of rail head at Lambs Business Park.

Summary of Comments	Raised by	Response	Any action arising
Former Weylands sewage treatment works, Walton-on-Thames			
Argues that no development should be considered at the Weylands site because it would be rewarding unlawful behaviour	Residents	This comment is noted.	No action arising.
Concerns over suitability of the Weylands site because of its location within the greenbelt	Resident, Chambers Runfold Plc and Elmbridge Borough Council	<p>The former Weylands sewage treatment works is located within the Green Belt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Greenbelt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.</p>	No action arising
Concerns over the suitability of the Weylands site because of the sites proximity to residential areas	Residents and Elmbridge Borough Council	In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annexe 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts do not occur as a result of waste management development in this location.
Concerns over the suitability of the Weylands site	Residents and	Policy 15 seeks to ensure that vehicle movements associated with the	Transport Assessment of the site. Annex 1 to

Summary of Comments	Raised by	Response	Any action arising
Former Weylands sewage treatment works, Walton-on-Thames			
because of the resultant volume of traffic, to a site that has limited access on a road network that is over capacity	Elmbridge Borough Council	development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Transport Assessment is being carried out, which will assess the acceptability of the site, in terms of impacts on the highway network. This assessment will also highlight any concerns, which can then be addressed/mitigated against.	include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concern that previous planning objections for the Walton site have been ignored - concerns regarding traffic levels, pollution and safety	Resident	These concerns are acknowledged and respondents should be reassured that all representations to applications are considered during an application.	No action arising
After a successful campaign in 2015/16 thought Weylands had reached stage 3 of the site identification that - this site would be eliminated from further consideration. What does it take for this to be acknowledged?	Resident	The site Identification and Evaluation process is set out in the "Site Identification and Evaluation Report". This process established that, subject to certain requirements for mitigation (as set out in Annexe 1 of the SWLP), that, in principle, the site was suitable for development and so could be allocated in the SWLP.	No action arising
Concerns over the increased traffic emissions that would result from further development of the Weylands site	Residents	Poor air quality as a result of traffic emissions is addressed through Policy 14, which states planning permission for waste development will be granted where it can be demonstrated that there will not be unacceptable impact on communities and the environment, including air quality.	Assessment work being carried out will highlight the potential issues surrounding air quality and pollution. Update Annexe 1 with outcomes of AQIA.
Concerns over the suitability the Weylands site because of the fear that an increase in HGV movements will result in a decrease in safety and increase the risk of an accident	Residents and Elmbridge Borough Council	This concern is acknowledged. Policy 14 states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development. Policy 15 states, planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would include those crossing roads.	A Transport Assessment is being undertaken, to enable us to better understand the potential impact of waste related development upon the local road network, including implications for road safety. Furthermore, a detailed Transport Assessment will be required at the application stage. If required, developments could be subject to conditions on opening times and/or vehicle movements, thus minimising the disruption to the surrounding road network. Update Annexe 1 with outcomes of TA.
Concerns over the suitability of the Weylands site because of the sites proximity to the proposed "Garden Village"	Residents and Elmbridge Borough Council	It is accepted that this a concern for many. Policy 14 addresses this where it states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development (The Garden village Proposal). And, in	Assessment work is being undertaken to identify the cumulative impacts of both the developments, which will inform the next stage of the plan. Update Annexe 1 with results of assessment work.

Summary of Comments	Raised by	Response	Any action arising
<i>Former Weylands sewage treatment works, Walton-on-Thames</i>			
		Policy 15, that states, planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would take into account the cumulative impact of traffic from both the waste development and the Garden village proposal.	
Concerns that development at the Weylands site will result in increases in vibrations felt in the surrounding area	Resident	It is accepted that that increased vibrations will be a concern of residents and businesses. Policy 14 of the plan is intended to ensure that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, and this includes impacts caused by vibration. Policy 15, concerning the transport of waste, is intended to ensure that the use of HGVs is minimised and does not cause unacceptable impacts.	No arising action
Concerns over the resultant smells that might arise as a result of further development at the Weylands site	Residents and Elmbridge Borough Council	Waste management facilities can be operated in a manner that ensures nuisance caused by odour does not occur. Policy 14 will ensure that any proposals for development at this site would demonstrate that the development would not result in an unacceptable impact on communities and the environment due to odour.	No arising action
Concerns over the suitability of the Weylands site because of its proximity to Hersham Station	Resident	Policy 14 states planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, this would include commuters moving to and from the station. Policy 15 states that planning permission will be granted where it can be demonstrated that vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network, minimising the impact of any development on the vehicle and pedestrian movements to and from the station.	No arising action.
Concerns of the suitability of the Weylands site due to it being adjacent to a biodiversity opportunity area	Natural England	The council note that the location of the Weylands site adjacent a proposed biodiversity opportunity area will be a concern for some. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Annex 1 will be updated to make specific reference to the proposed biodiversity opportunity area as this is a key development management matter to which any proposal for development will need to have particular regard.
Concern over the deliverability of the site, argues it was named in the 2008 plan and is still not in use and that Addlestone Quarry is a more deliverable	Cappagh Group	This site was identified following a thorough process of site identification and evaluation including a new call for sites (as set out in the Site Identification and Evaluation Report). There is no evidence to suggest	No action arising

Summary of Comments	Raised by	Response	Any action arising
<i>Former Weylands sewage treatment works, Walton-on-Thames</i>			
site		that this site cannot be practically delivered over the life of this plan though this is subject to further detailed technical assessment currently being undertaken. The plan includes a range of deliverable sites to provide certainty and flexibility in ensuring that waste management capacity requirements can be achieved.	
Concerns over further development at the Weylands site limiting Surrey's recycling capacity	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising

Summary of Comments	Raised by	Response	Any action arising
<i>Oakleaf Farm, Horton Lane, Stanwell Moor</i>			
Concerns over further development of the Oakleaf farm site, that might result in increased noise pollution for residents and businesses in the surrounding area	Residents	The potential for development at the site to cause nuisance due to noise would be considered and likely conditioned at the planning application stage. The potential for nuisance from noise is dealt with in Policy 14, which states that planning permission for waste development will be granted where it can demonstrate that there will not be an unacceptable impact on communities and the environment in terms of noise.	Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concerns over the risk of further development of the Oakleaf Farm site because of the resultant risk of the surrounding roads getting in a worse condition (mud)	Residents and Spelthorne Borough Council	The waste planning authority notes this concern. Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network, specifically stating that where appropriate, wheel cleaning facilities will be provided. A Transport Assessment is being undertaken to identify the impact off waste related development on the transport network and determine which types and scale of development might be suitable at each site.	Update Annexe 1 with outcomes of TA.
Concerns over the risk of increased vehicle movements, including HGVs, to and from Oakleaf Farm when the road network is already over capacity	Residents and Spelthorne Borough Council	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Annexe 1 considers transport and accessibility and it is likely that a Transport Assessment would be required to accompany any application. Assessment is being undertaken of potential impacts due to vehicle movements and the outcomes will be used to update Annexe 1. Policy 15 seeks to ensure that vehicle movements associated with the proposed development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding areas.	Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concerns over any further development at Oakleaf Farm resulting in decreased safety risk/increased risk of an accident	Residents	Policy 14 that states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development. Policy 15 states planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other	A Transport Assessment is being undertaken, to enable us to better understand the potential impact upon the local transport network. This will help to identify issues, attempt to resolve them and understand whether mitigation is required. Transport issues will also be assessed at the application stage. Where appropriate, development could be subject to conditions on opening times and/or vehicle movements, thus minimising the

Summary of Comments	Raised by	Response	Any action arising
<i>Oakleaf Farm, Horton Lane, Stanwell Moor</i>			
		users of the network, which would include those crossing roads.	disruption to the surrounding road network. Update Annexe 1 with results of TA.
Concerns over the suitability of further development at Oakleaf Farm because of the proximity of the site to residential areas	Residents	Assessment work will be carried out to identify potential impacts to nearby residents. Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.
Concerns that Oakleaf Farm would be an unfair location for a waste facility because the area is already blighted by Heathrow and the M25 and the prospect of further airport expansion and expansion of the motorway.	Residents	The Oakleaf Farm site has been subjected to the same sieving process as all other sites and has found to be suitable. Any development would have to demonstrate how it meets Policy 14 (planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment). This impact would have to be considered in combination with other development in the area.	No action arising.
Concerns that the Oakleaf Farm site would be an unsuitable location because of the potential increase in air pollution/poor quality of air	Residents	Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site for different types and scales of waste related development. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.
Concerns over the suitability of the Oakleaf Farm site because of the sites visibility to surrounding properties	Residents	Assessment work is being undertaken to specifically assess the potential for impacts on visual amenity which will highlight any potential negative consequences, allowing them to be properly addressed/mitigated. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities and the environment, and specifically references the appearance of any development, thus aiming to minimise the extent of	Annex 1 to include any specific key development management requirements, identified by the Landscape and Visual Impact Assessment that will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
<i>Oakleaf Farm, Horton Lane, Stanwell Moor</i>			
		visual intrusion. Policy 13 is intended to ensure that development is of a scale, form and character appropriate to its location.	
Concerns over the suitability of the Oakleaf Farm site because of the resultant smell that could arise	Residents	Waste management facilities can be operated in a manner that ensures nuisance caused by odour does not occur. Policy 14 will ensure that any proposals for development at this site would demonstrate that the development would not result in an unacceptable impact on communities and the environment due to odour.	No action arising.
Concerns over the suitability of the Oakleaf Farm site because of the existing and ongoing problems with taxis parking in the village and making the road network difficult to negotiate in HGVs	Residents	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. A Transport Assessment is being carried out which will assess the suitability of the site for different types of waste related development in terms of impacts on the highway network. This assessment will also highlight any concerns.	Transport Assessment is being undertaken to understand the suitability of the site for different forms of waste related development. This work will feed into Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concerns over the suitability of the Oakleaf Farm site due to an existing and ongoing problem in the village with litter	Residents	The county council note this but would question the relationship between litter problems in the village and allocating the Oakleaf Farm site as a potential site for waste relating development in the plan.	No action arising.
Concerns that Oakleaf Farm would be an unsuitable location because of the risk of vibrations being felt in surrounding properties and businesses	Resident and Spelthorne Borough Council	It is accepted that increased vibrations will be a concern of residents and businesses. Policy 14 of the plan is intended to ensure that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, and this includes impacts caused by vibration. Policy 15, concerning the transport of waste, is intended to ensure that the use of HGVs is minimised and does not cause unacceptable impacts. These impacts are required to be assessed at the application stage.	No action arising.
Argue that residents should have been offered compensation for any development at Oakleaf Farm	Residents	The county council seek to ensure that any development would not have an unacceptable impact on local communities and implement this through Policy 14 of the draft plan, which states that planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment.	No action arising.
Concerns over resultant development at Oakleaf Farm devaluing property in the local area	Residents	Whilst the plan makes no provision to stop any house price decrease it does, through Policy 14, state that planning permission will only be granted where it can be demonstrated that there will not be an unacceptable impact on communities and environment, including a	No action arising.

Summary of Comments	Raised by	Response	Any action arising
<i>Oakleaf Farm, Horton Lane, Stanwell Moor</i>			
		range of considerations, specifically the general amenity.	
Concerns over the suitability of the Oakleaf Farm site due to its location within the greenbelt	Residents	<p>The Oakleaf Farm site is located within the Green Belt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Greenbelt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.</p>	No action arising.
Concerns over the suitability of the Oakleaf Farm site because of the prospect of an Immigration Site also being established in the village	Residents	The county council seek to ensure that any development would not have an unacceptable impact on local communities and implement this through Policy 14 of the draft plan.	No action arising.
Concerns over the prospect of development at Oakleaf Farm because of the disruption this could have on bridle paths in the surrounding area	Residents	The waste planning authority notes this concern. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc. Policy 14 also seeks to ensure that planning permission will be granted there it can be demonstrated that there will not be an unacceptable	No action arising.

Summary of Comments	Raised by	Response	Any action arising
<i>Oakleaf Farm, Horton Lane, Stanwell Moor</i>			
		impact upon the natural environment, the appearance, quality and character of the landscape and on public open space, the rights of way network and outdoor recreation facilities (including horse riding and bridle paths).	
Concerns over the prospect of development at Oakleaf Farm because of the risk of local streams becoming contaminated	Residents	Policy 14 seeks to ensure that there will not be an unacceptable impact on the environment and includes that related to the contamination of land or groundwater. In addition the county council is undertaking a Strategic Flood Risk Assessment to understand the risk of flooding and contamination at each of the sites.	The SFRA will inform the development criteria, which guides the possible development at each site. Update Annexe 1 with outcomes of SFRA.
Concerns over the prospect of further development at the Oakleaf Farm site as it might limit Surrey's recycling	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising.
Concerns over the suitability of the Oakleaf Farm site due to the site being located adjacent to Staines Moor site of Special Scientific Interest	Resident and Natural England	Protection Staines Moor is in part provided for by Policy 14, which only allows development where it can be demonstrated that there will be no unacceptable impact on the natural environment, biodiversity and geological conservation interests including green infrastructure.	Note proximity of site to SSSI in Annexe 1 as a development management consideration.
Concerns over the suitability of Oakleaf Farm due to it being located within a biodiversity opportunity area	Surrey Nature Partners	This concern is noted. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Annex 1 will be updated to make specific reference to the proposed biodiversity opportunity area as this is a development management matter.
Argue that the Council needs more clarification on what is proposed on the Oakleaf Farm site	Spelthorne Borough Council	The county council is undertaking assessment work to better understand the types of waste related development that may be suitable at each allocated site. The results of the assessment work will feed into the site development criteria, which will guide the possible development at each site.	The results of the assessment work will provide an indication of the types of waste management facility that might be suitable at each site. Update Annexe 1 with outcomes of assessment work.
Concern over the potential impact of HGVs at the Oakleaf Farm site	Spelthorne Borough Council	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
<i>Oakleaf Farm, Horton Lane, Stanwell Moor</i>			
		able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	
Concern that the site description and criteria for the Oakleaf Farm site makes no reference to the visual and sound barrier (earth bund) - Although it would be reasonable to expect that any additional waste facilities would be provided within the bund	Spelthorne Borough Council	The county council note this.	Add detail regarding visual and sound bund to the site description.
Concern that the site is immediately north of the King George VI reservoir, which forms part of the South West London Waterbodies SPA for birds - this has not been referenced in the biodiversity section	Spelthorne Borough Council	This concern is noted. This is implemented via Policy 14, which sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests.	The plan is subject to Sustainability Appraisal and Strategic Environmental Assessment, which together will form the Environment and Sustainability report. This work will consider this issue. Further to this, a Habitats Regulation Assessment will be required to assess the impact of development on a European designated site, thus the potential impacts will be heavily studied and any issues will be addressed/mitigated where possible. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Point out that Spelthorne has conducted greenbelt assessment work and Local area 2, where the Oakleaf farm site is located, was assessed as performing moderately against the purposes of the greenbelt	Spelthorne Borough Council	The county council note this.	No action arising.
Concerns over the suitability of the Oakleaf Farm site because of its proximity to a SPA	Natural England and Spelthorne Borough Council	This concern is noted. Policy 14 sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests.	The plan will be subject to Sustainability Appraisal and Strategic Environmental Assessment, which together will form the Environment and Sustainability report, which will consider this issue. Further to this, a Habitats Regulation Assessment will be required to assess the impact of development on a European designated site, thus

Summary of Comments	Raised by	Response	Any action arising
<i>Oakleaf Farm, Horton Lane, Stanwell Moor</i>			
			the potential impacts will be heavily studied and any issues will be addressed. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
Land adjacent to Trumps Farm, Kitsmead Lane, Longcross			
Concerns over the proximity of Virginia Water to the Trumps Farm site	SMECH Management Company and Runnymede Borough Council	The waste planning authority notes this concern. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc.	No action arising
Concerns over the cumulative impact of traffic from the Trumps Farm proposal and the Garden Village proposal	Residents, SMECH Management Company, Runnymede Borough Council and the Chertsey Society	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Before the draft plan goes any further, a detailed Transport Assessment will be carried out, which will assess the acceptability of the site, in terms of impacts on the highway network. This assessment will also highlight any concerns, which can then be addressed/mitigated against.	Transport Assessment of the site. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concerns over the level of noise any development at Trumps Farm would create	SMECH Management Company	The relatively rural location of this site does mean that there are fewer receptors sensitive to noise which are proximate to this site. The potential for development at the site to cause nuisance due to noise would be considered and likely conditioned at the planning application stage. The potential for nuisance from noise is dealt with in Policy 14, which states that planning permission for waste development will be granted where it can demonstrate that there will not be an unacceptable impact on communities and the environment in terms of noise.	Health impact assessment to be completed. Add text to the plan (under sub-section headed "General Amenity" in section 8) confirming need for facilities to be regulated by an Environmental Permit issued by the Environment Agency and role of Borough and District Council environmental health officers. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concerns over the resultant smell that might arise if there were to be further development at Trumps Farm	Residents and SMECH Management Company	Waste management facilities can be operated in a manner that ensures nuisance caused by odour does not occur. Policy 14 will ensure that any proposals for development at this site would demonstrate that the development would not result in an unacceptable impact on communities and the environment due to odour. District and Borough Council environmental health controls will also help ensure that nuisance caused by odour does not occur.	No arising action
Concern over the deliverability of the Trumps Farm site due to its inclusion in the 2008 plan and its current status as not in use	Cappagh Group	This site was identified following a thorough process of site identification and evaluation including a new call for sites (as set out in the Site Identification and Evaluation Report). There is no evidence to suggest that this site cannot be practically delivered over the life of this plan though this is subject to further detailed technical assessment currently	No arising action

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjacent to Trumps Farm, Kitsmead Lane, Longcross</i>			
		being undertaken. The plan includes a range of deliverable sites to provide certainty and flexibility in ensuring that waste management capacity requirements can be achieved.	
Concerns over the impact any development at Trumps Farm would have on air quality	Residents, SMECH Management Company, The Chertsey Society, Surrey Heath Borough Council and the RSPB	Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include outcomes of AQIA.
Concerns over the proximity of Trumps Farm to Longcross Garden Village	Runnymede Borough Council and The Chertsey Society	Policy 14 addresses this where it states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and other forms of development (The Garden village Proposal). Policy 15 states that planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, which would take into account the cumulative impact of traffic from both the waste development and the Garden village proposal.	Assessment work will assess the cumulative impacts of waste related development and other types of development. This work will identify the likely impacts of development.
Concerns over the proposed access to the Trumps Farm site on the B386 and Holloway Hill	Resident and the Chertsey Society	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site for different types and scales of development. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
Land adjacent to Trumps Farm, Kitsmead Lane, Longcross			
Concerns over the possibility of groundwater pollution as a result of the proposed development of the Trumps Farm site	Residents and SMECH Management Company	The waste planning authority notes this concern. Policy 14 seeks to ensure that there will not be an unacceptable impact on the environment and specifically mentions the issue of contamination. The county council is also undertaking a Strategic Flood Risk Assessment to understand each sites risk of flooding and contamination.	Annex 1 to be updated to include any specific key development management requirements, identified by the SFRA that will need to be taken into account in any planning application for development at the site.
Concerns over the suitability of Trumps Farm as a location for development as it is within the greenbelt	Resident, The Chertsey Society and SMECH Management Company	<p>The Trumps Farm site is located within the greenbelt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Greenbelt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.</p>	No action arising.
Concerns over the suitability of Trumps Farm as a location for development because it is highly visible and is likely to be unsightly	Residents	Work is being undertaken to specifically assess the potential for impacts on visual amenity which will highlight any potential negative consequences, allowing them to be properly addressed/mitigated. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities and the environment, and specifically references the	Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjacent to Trumps Farm, Kitsmead Lane, Longcross</i>			
		appearance of any development, thus aiming to minimise the extent of visual intrusion. Policy 13 is intended to ensure that development is of a scale, form and character appropriate to its location.	site.
Concerns over the suitability of the Trumps farm site because of its distance from the M25	The Chertsey Society	The waste planning authority note that the increase in HGVs as a result of the development of a waste facility is a key concern for residents, businesses and people who frequently use the local road network, especially if they are concerned about the suitability of a site because of its access to the M25. This has been implemented via Policy 15 which states, vehicle movement will be minimised, will not have an unacceptable impact on the capacity of the highway network and there is a safe and adequate means of access to the highway network and vehicle movements will not have an adverse impact on the safety of the highway network.	A Transport Assessment will be undertaken, to enable us to better understand the potential impact upon the local road network, which will inform the next stage of the plan. Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concerns over the suitability of the Trumps Farm site because of the sites distance from the Cobham Common Special Protection Area and any impact development might have on this	The RSPB, The Chertsey Society and Surrey Heath Borough Council	This concern is noted. Policy 14 sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests.	The plan is subject to Sustainability Appraisal and Strategic Environmental Assessment, which together will form the Environment and Sustainability report. Further to this, Habitats Regulation Assessment will be undertaken to assess the impact of development on a European designated site, thus the potential impacts will be heavily studied and any issues will be addressed/mitigated where possible. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concerns over the suitability of the Trumps Farm site because of the safety/risk increased HGV movements pose to the area, specifically on school children	Resident and The Chertsey Society	This concern is acknowledged. This issue is dealt with in Policy 14 that states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development (schools). And, in Policy 15, that states, planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would include those	Transport Assessment is being undertaken. Annex 1 to be updated to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
Land adjacent to Trumps Farm, Kitsmead Lane, Longcross			
		crossing roads.	
Concerns over the suitability of the Trumps Farm site because of the resultant increase in congestion/intensification of the existing congestion problems in the area, with an increase in HGV movements	Resident, the Chertsey Society, SMECH Management Company and Surrey Heath Borough Council	Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and that vehicle movements will not have an unacceptable impact on the surrounding road network. Before the Draft plan goes any further, a detailed Transport Assessment will be carried out, which will assess the acceptability of the site, in terms of impacts on the highway network. This assessment will also highlight any concerns, which can then be addressed/mitigated against.	Transport Assessment of the site. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concerns over whether the Trumps Farm site would be appropriate because of the site being an established employment site	Runnymede and Surrey Heath Borough Councils	The waste plan site is separate from, and not part of, the existing waste management uses in Kitsmead Lane.	No action arising
Concerns over the allocation of the Trumps Farm site because of the risk it will limit Surrey's recycling capacity	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising.
Concern over the suitability of the Trumps Farm site because of the sites location within a biodiversity opportunity area	Surrey Nature Partners	This concern is noted. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Assessment work being carried out will enable the council to better understand the issues and adjust the plan accordingly. Annex 1 will be updated to make specific reference to the proposed biodiversity opportunity area as this is also a development management matter.
Concern over the appropriateness of the Trumps Farm site because of the sites proximity to a SANG	Natural England	Land to the south is proposed to be allocated as a SANG as part of the Longcross Garden Village development. The SANG does not directly adjoin the site but any proposal would need to take account of impacts on the SANG as well as the garden village. It is accepted that impact upon the environment is a key concern of many. Policy 14 sets out that planning permission will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests.	Ensure that the fact in combination impacts will need to be assessed is clear in Annexe 1 site description.
Concerns over the Trumps Farm site because of the likely negative impact it might have on emergency services vehicles going to nearby St Peters Hospital	SMECH Management Company Ltd	Policy 14 states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, this would include the hospital. It is also dealt with through Policy 15, which states that planning permission will be granted where it	No action arising.

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjacent to Trumps Farm, Kitsmead Lane, Longcross</i>			
		can be demonstrated that vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network, minimising the impact of any development on the vehicle movements to and from the hospital, including emergency vehicles.	
Concern over the Trumps Farm site and if it is a fitting location due to there being ancient woodland present on site	Surrey Nature Partners	This concern is acknowledged. The avoidance of unacceptable impacts on Ancient Woodland is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes Ancient Woodland.	Annex 1 will be updated to make specific reference to the Ancient Woodland as a key development management matter to which any proposal for development will need to have regard.

Summary of Comments	Raised by	Response	Any action arising
Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey			
Concern over the Lyne Lane site because of the potential smell	Resident	Waste management facilities can be operated in a manner that ensures nuisance caused by odour does not occur. Policy 14 will ensure that any proposals for development at this site would demonstrate that the development would not result in an unacceptable impact on communities and the environment due to odour. District and Borough Council environmental health controls will also help ensure that nuisance caused by odour does not occur.	No arising action
Concern over the Lyne Lane site because of the site potentially becoming unsightly	Resident and Cappagh Group	Detailed work is being undertaken to specifically assess the potential for impacts on visual amenity which will highlight any potential negative consequences, allowing them to be properly addressed/mitigated. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities and the environment, and specifically references the appearance of any development, thus aiming to minimise the extent of visual intrusion. Policy 13 is intended to ensure that development is of a scale, form and character appropriate to its location.	Assessment work being carried out will highlight potential visual impact of waste related development. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.
Concern over the suitability of the Lyne Lane site because of the risk of it being polluting to the local environment	Resident and The Chertsey Society	Air Quality Impact Assessment is being carried out to assess the potential impacts on air quality arising from emissions resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 14 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on communities and the environment, including air quality. Any emissions from the site would be regulated by the Environment Agency to ensure they do not cause harm to human health.	Annex 1 will be updated to include any specific key development management requirements that are needed to help ensure unacceptable impacts on air quality do not occur as a result of waste management development in this location.
Concerns over the suitability of the Lyne Lane site because of the poor access and the roads not being capable of dealing with an increase in HGV/car movements, including Holloway Hill and this distance of the site from Junction 11 of the M25	Residents, The Chertsey Society and Cappagh Group	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey</i>			
		network.	
Concerns over the suitability of the Lyne Lane site because of the risk any development will exacerbate existing congestion	Residents, Cappagh Group, Runnymede Borough Council and The Chertsey Society	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concerns over the development of the Lyne Lane site as it might limit Surrey's recycling potential	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising.
Concern over the deliverability of the Lyne Lane site because of its inclusion in the 2008 plan and its status as still not in use	Cappagh Group	This site was identified following a thorough process of site identification and evaluation including a new call for sites (as set out in the Site Identification and Evaluation Report). There is no evidence to suggest that this site cannot be practically delivered over the life of this plan though this is subject to further detailed technical assessment currently being undertaken. The plan includes a range of deliverable sites to provide certainty and flexibility in ensuring that waste management capacity requirements can be achieved.	No action arising.
Concern over the suitability of the Lyne Lane site because of its location within the Green Belt	Cappagh Group	The Lyne Lane site is located within the greenbelt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Greenbelt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special	No action arising

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey</i>			
		<p>circumstances exist. Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.</p>	
<p>Concerns over the proximity of the Lyne Lane site to Chobham Common SPA</p>	<p>Resident and The Chertsey Society</p>	<p>This concern is noted. Policy 14 sets out that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on the environment, including the natural environment, biodiversity and geological conservation interests.</p>	<p>The plan is subject to Sustainability Appraisal and Strategic Environmental Assessment, which together will form the Environment and Sustainability report. Further to this, a Habitats Regulation Assessment will be required to assess the impact of development on a European designated site, thus the potential impacts will be heavily studied and any issues will be addressed/mitigated where possible. Annex 1 to include any specific key development management requirements, identified by the assessment that will need to be taken into account in any planning application for development at the site.</p>
<p>Concern over the suitability of development at the Lyne Lane because of the increase in risk/safety of increased HGVs and movements of children going to school around the area</p>	<p>Resident and The Chertsey Society</p>	<p>Policy 14 states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities. Policy 15 states planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would include those crossing roads. The county council is also undertaking a Transport Assessment which will consider</p>	<p>Transport Assessment work will enable the council to get a better understanding of what the likely impacts will be on the surrounding transport network, which will enable us to identify issues.</p> <p>Update Annexe 1 with outcomes of TA.</p>

Summary of Comments	Raised by	Response	Any action arising
<i>Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey</i>			
		implications of waste related development on the transport network, including safety.	
Concerns over the proximity of the Lyne Lane to Longcross Garden Village	Runnymede borough Council and The Chertsey Society	Policy 14 states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities, which will including cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development (The Garden village Proposal). Policy 15 states planning permission for waste development will be granted where it can be demonstrated that vehicle movements are minimised and that vehicle movements will not have an unacceptable impact on the highway network, therefore other users of the network, which would take into account the cumulative impact of traffic from both the waste development and the Garden village proposal. Cumulative impacts from different types of development are also being considered in the assessment work being undertaken for the plan, which seeks to understand the implications of locating different waste management facilities at each site.	Assessment work will consider the impact of waste related development in combination with other development in the vicinity. The results of this assessment work will feed into the site development criteria which will guide suitable development at the site. Update Annexe 1 with outcomes of assessment work.

Summary of Comments	Raised by	Response	Any action arising
Sites – Other comments			
Concern that incineration is an inappropriate technology	Resident	Incineration with energy recovery (or 'Energy from Waste') is a widely used and accepted option for managing waste effectively. As set out in national policy, the 'Waste Hierarchy' (see paragraph 3.1.1 of the plan) recognises that recycling of waste is preferred over incineration (with energy recovery) and Policy 1 of the plan reflects this by ensuring that the management of waste takes place in a manner that "does not prevent management of waste at the highest point practical in the waste hierarchy". Policy 14 states that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment. As with most waste management facilities, any proposal for management by this method requires an Environmental Permit prior to being allowed to operate. The Environment Agency will only issue such a permit if it is satisfied that a facility can be operated without pollution of the environment and harm to human health. Air Quality Impact Assessment is being undertaken to establish whether the development of an incineration facility at any of the proposed allocations would have unacceptable impacts on the environment. The Background Paper "Types of Waste Management Facility" provides more information about Energy from Waste.	Annex 1 will be updated to specify the types of waste management facility that could likely be accommodated at certain proposed allocations.
No concerns at this stage, but might have objections when details of development at each site are finalised	Runnymede Borough Council	The waste planning authority note this. Assessment work is being undertaken to determine the types and scale of waste related development that might be suitable at each site. This will be incorporated into the site development criteria.	Update Annexe 1 with the results of the assessment work being undertaken.
Concerns over the suitability of a number of the sites because of the argument that EFW facilities should be located on small units within industrial estates	Resident and The Chertsey Society	Each of the sites is being assessed for their suitability for different types of waste related development, including EFW. As most of the allocated sites are situated within the greenbelt, any development on a site in the Green Belt would have to demonstrate that there is no other suitable location for this development as part of a need to demonstrate very special circumstances for the development. It is suggested that they would therefore have to conduct a suitable alternative sites assessment, which would include industrial estates.	No arising action
Concern over the suitability of a number of the sites because of the sites being within or adjacent to a biodiversity opportunity area	Surrey Nature Partners	This concern is noted. The avoidance of unacceptable impacts on biodiversity is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes biodiversity opportunity areas.	Annex 1 will be updated to make specific reference to the proposed biodiversity opportunity area as this is a key development management matter to which any proposal for development will need to have particular regard.

Summary of Comments	Raised by	Response	Any action arising
Sites – Other comments			
Argue that more consideration of greener alternatives is needed i.e. more recycling	Residents	WNA has identified a need for more waste to be disposed of and recycling capacity is already being met. The plan's strategy is one of encouraging waste management further up the waste hierarchy, as referred to in Policy 1. The SWLP provides updated targets for sustainable management of waste for the period up to 2033 which reflect the plan's vision and strategic objectives. These targets determine what type of waste management will be needed in the future. The targets encourage the management of waste further up the waste hierarchy and is put into action by Policy 1.	No action arising
Existing roads surrounding the sites are unsuitable	Residents and Wonham Place Ltd	The WPA are undertaking a transport assessment of all proposed sites to assess the suitability of sites to accommodate different types and scales of waste related development and associated transport movements.	As appropriate, update Annex 1 to reflect outcomes of TA.
Concern over the suitability of a number of the sites because of the sites being within the greenbelt	Resident and Chambers Runfold Plc	<p>The Martyrs Lane site is located within the greenbelt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Greenbelt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites</p>	No action arising

Summary of Comments	Raised by	Response	Any action arising
Sites – Other comments			
		proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.	
Concern over the suitability of a number of the sites because of their access	Resident and Chambers Runfold Plc	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concern over the suitability of a number of the sites because of the resultant increase in traffic	Resident and Chambers Runfold Plc	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Argue that the list of sites in incomplete - Draft waste plan p.20 show up to 11 sites may be required and non tech summary p.11 says that these sites don't include sites for C,D and E waste or for landfill	Claygate Parish Council	The draft plan is not proposing to allocate any land for C, D&E waste or for Landfill. This issue is dealt with by Policy 1, that states that permission for development will be granted where the diversion of waste away from landfill is achieved in a matter that does not prevent management of waste at the highest point practical in the waste hierarchy.	No action arising.

Summary of Comments	Raised by	Response	Any action arising
Sites – Other comments			
Argue that an archaeological/ heritage impact assessment is necessary for each site	Historic England	The council notes and welcomes this comment.	The council will need to undertake detailed assessment work that will set out the potential impact on archaeology/heritage at each site.
Reserves the right to object in the future on adverse effects on the historical environment	Historic England	The council notes and welcomes this comment.	No action arising.
Concerns over increased development at a number of sites limiting Surrey's recycling capacity	Resident	The plan does not propose any closures to recycling facilities or reductions in recycling capacity, indeed it is intended to facilitate the management of waste by increasing recycling.	No action arising.
Argue that building on or extending existing waste uses is favourable as it should cause less disruption	Resident	The council agrees and notes the support for this element of the draft plan	No action arising
Concern over a number of the sites suitability because of their location within the green belt	Residents and Guildford Borough Council	<p>A number of sites are located within the greenbelt, however, development could be permitted here under 'very special circumstances' - in particular the fact that a comprehensive search for sites has revealed very few alternative opportunities to meet strategic waste management requirements not located within the Greenbelt. As explained in paragraph 8.7.9 any proposed development "must be acceptable in its own right taking into account all material considerations including Green Belt policy". This is set out in Policy 9 that states proposals in the Green Belt "will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.</p> <p>Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm". Para 8.7.11 states: "additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:</p> <p>a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.</p> <p>b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport." Sites proposed for allocation in the Green Belt are sites which contain, lie</p>	No action arising.

Summary of Comments	Raised by	Response	Any action arising
Sites – Other comments			
		adjacent to or have been used for waste management provision in the past and/or are previously developed sites in whole or in part.	
Argue that there is a need for these developments	Resident	The council agrees and notes the support for this element of the Draft plan	No action arising
Concern over the suitability of a number of the sites because of their poor accessibility	Resident	Transport Assessment is being carried out to assess the potential impacts on the highway network of traffic (including HGVs) resulting from waste management development in this location. The results of this assessment will be taken into account in the preparation of this plan including in the assessment of the suitability of this site. In accordance with Policy 15 of the plan, any proposals for development at this site will have to demonstrate that there will not be an unacceptable impact on the safety and capacity of the highway network, that there could be a safe and adequate means of access to the highway network and waste is able to be transported using the Lorry Route Network with minimal vehicle movements and use of local roads. Any planning permission that is granted would likely be subject to conditions on opening times and/or vehicle movements, to minimise any disruption to the surrounding road network.	Annex 1 to be updated to include any specific key development management requirements, identified by the transport assessment that will need to be taken into account in any planning application for development at the site.
Concern over the suitability of a number of the sites because of their location on floodplains	Residents	The issue of flood risk is covered in the Environmental and Sustainability Report and indicates that there is no issue with the sites in terms of their flood risk. Policy 14 states that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, specifically in terms of flood risk. The County Council is undertaking a Strategic Flood Risk Assessment to assess the risk of each of the sites to flooding.	Update Annexe 1 with the results of the SFRA.
Concerns over the suitability of the sites because of their location adjacent to ancient woodland	Natural England	It is accepted that some are concerned with the sites proximity to ancient woodland. The avoidance of unacceptable impacts on Ancient Woodland is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be an unacceptable impact on the environment and this specifically includes Ancient Woodland.	Annex 1 will be updated to make specific reference to the Ancient Woodland as a key development management matter to which any proposal for development will need to have particular regard.
Argues that the sites seem reasonable - depending on checks and scrutiny	Resident	The council notes this comment.	No action arising
Concern that the site descriptions should clarify that parts of the sites are located within greenbelt	Guildford Borough Council	The council notes this comment.	Add clarification

Appendix 7 - Nominated Sites

Site nominator	Site	Comments	Response to comments	Any action arising
Antony Collier	Kitsmead Recycling Centre, Trumps Farm, Kitsmead Lane, Longcross, Chertsey	<ul style="list-style-type: none"> - Surrey County needs additional composting capacity, and suggested that Kitsmead could provide this in the future once they have achieved greater sustainable efficiencies. - Suggested that allocating the Trumps Farm site would protect current activities from encroaching development and would reduce the burden of meeting 'very special circumstances' for development in the Green Belt each time an application is submitted. 	<ul style="list-style-type: none"> - This site was considered and rejected in the Site Identification and Evaluation document (Site ID:RU02 A+B) - Allocation in the plan would not prevent the applicant from having to demonstrate 'very special circumstances' for development in the Green Belt, as allocation of the site in the SWLP would not remove the site from the Green Belt. All sites allocated in the plan would have to demonstrate 'very special circumstances' as part of any application. - The county council note that existing waste operations at the site would be safeguarded by policy. - The site has some possible additional capacity but is limited by site area (Circa + 10,000 tpa). It is not considered to offer enough additional capacity to be allocated as a strategic site. 	No action arising.
Janet Ashton/Peter and Emma Chambers,	Homefield Recycling and Recovery Facility	<ul style="list-style-type: none"> - Stated that the Homefield site should be allocated as the pit does not have to be restored until 2042, therefore the site will be operative during the whole plan period and, although temporary permissions for recycling run out in 2020, this could be renewed. - Suggested the site should be included in plan without current limitations in place. - Stated a crusher could be placed on site to deal with all material on site, so no need to transport material by road. - Homefield is the only major facility producing aggregate and soil in SW Surrey. Suggested that if it were to close then material would have to be moved over much greater distances. - Suggested the blanket approach of 'Sieve E – former operational mineral workings and land allocated for mineral working' does not allow for differentiation between a long term sand pit such as Homefield where 	<ul style="list-style-type: none"> - This site was considered and rejected in the Site Identification and Evaluation document (Site ID:WA14) - Site is excluded from allocation as it is a former minerals site. Minerals sites are justified as permissible on greenbelt land as they are temporary uses that must be restored as part of an ongoing restoration scheme. This is a policy approach taken by Surrey, which cannot be contradicted. The site is therefore not suitable for allocation within the plan. - The site is situated within an AONB. - The council's Aggregates Recycling Joint DPD (ARJDPD) adopted in 2013 addresses the issue of C,D & E waste. It will be reviewed as part of the review of the Surrey Minerals plan. Until this review evidence suggests that there will be no significant need for additional C,D & E recycling capacity. 	<p>Site plan needs to be redrawn.</p> <p>Publish background paper which provides evidence supporting the council's approach to C, D and E waste.</p>

Site nominator	Site	Comments	Response to comments	Any action arising
		<p>restoration takes many years because of the sheer scale of the working and a sand gravel type extraction of the type found in in NW Surrey where progressive restoration is a key part of the process and restoration closely follows extraction.</p> <ul style="list-style-type: none"> - Stated that Homefield is operational for the whole plan period and is not subject to a staged restorations scheme with time restraints. - Stated that being in AONB is inconsequential, as the site will remain temporary and there are no current issues. - Stated that the other allocated sites are not viable, and detailed the previous applications on sites that have not gone ahead. - Suggested that Homefield fits with definition of a strategic site. 		
Firstplan (Vilna Walsh) on behalf of Cappagh Group Ltd,	Land at Addlestone Quarry, Byfleet Road, New Haw, Addlestone, KT15	<ul style="list-style-type: none"> - Stated that the site is in the greenbelt but that the county council cannot eliminate this site purely based on that, as other sites are also in greenbelt. - Argued that allocated sites should include sites with existing recycling facilities currently operating on a temporary permission. It is said this would reduce sites coming forward on an ad hoc basis. This would provide long term certainty for operators. - Proposed Addlestone quarry for CDE waste recycling and suitable co-located waste uses. - Acknowledged that the site was not considered further in SWLP as no strategic allocations are currently proposed for CDE uses. - Stated that the site operators wish for there're to be strategic CDE allocations. - Stated that the site also has capacity for co-location of other waste (e.g. composting). - Suggested that land at Addlestone Quarry is more viable than other sites, and that other allocated sites are 	<ul style="list-style-type: none"> - This site was considered and rejected in the Site Identification and Evaluation document (Site ID:RU13) - Site is excluded from allocation as it is a former minerals site. Minerals sites are justified as permissible on greenbelt land as they are temporary uses that must be restored as part of an ongoing restoration scheme. The site is therefore not suitable for allocation within the plan, - Please see Site ID and Evaluation doc for information on deliverability of sites. 	Publish background paper which provides evidence supporting the council's approach

Site nominator	Site	Comments	Response to comments	Any action arising
		undeliverable. They state that nothing having come forward on those sites in the last 10 years brings into question whether they are deliverable.		
Richard Ford, Brett Aggregates	Hirthermoor, Stanwell Moor, Stanwell, Nr Staines, Middlesex, TW19 6AX	<ul style="list-style-type: none"> - State that the site has a good location, good access (located next to Jtn 15 of M25) and is well screened. - Stated that the site takes in large volumes of waste but has a temporary permission which will expire, they argue it would be better to retain this site than to develop a new one capable of dealing with similar quantities. 	<ul style="list-style-type: none"> - This site was considered and rejected in the Site Identification and Evaluation document (Site ID:SP01) - This site was excluded from allocation in the preliminary round of sieving during the site identification and evaluation process as it is a former mineral working that is subject to restoration by means of in-filling. The site currently hosts a range of aggregates and soil recycling activities associated with ongoing restoration. planning permission requires that the site is restored by April 2023. The site is therefore not considered suitable for allocation in the plan. 	Publish background paper which provides evidence supporting the council's approach
Tim North on behalf of EGAP Recycling	Hays Bridge Farm, Brickhouse Lane, South Godstone	<ul style="list-style-type: none"> - This representation compared the Lambs Brickworks allocated site with the Hays Bridge Farm site considered in the Site Identification and Evaluation document, and sought to demonstrate the suitability of Hays Bridge Farm for allocation in the plan. - Suggested that the only difference between Lambs Brickworks and the Hays Bridge Farm site is their proximity to the strategic transport network (Hays Bridge being a further 1.2km from the A22). - Stated that Lambs Brickworks has limits on the number of traffic movements permitted to and from the site, with an overall daily maximum of 632 movements along Terracotta Road whereas Hays Bridge has no such restriction. - Stated that no consideration has been given to the importance of Lambs brickworks as a key employment site in the LPA's administrative area. - Stated that Lambs Brickworks is in closer proximity to a greater number of designated areas than Hays Bridge (Godstone Ponds SSSI, Mole Gap to Reigate Escarpment SAC & SSSI, Surrey Hills AONB, Surrey Hills AGLV, NCIs vs Blindley Heath SSSI, and fewer 	<ul style="list-style-type: none"> - This site was considered and rejected in the Site Identification and Evaluation document (Site ID:TA12) - This site was excluded from allocation as it was caught in the site sieving process in the site identification and evaluation report. The sieves the site was caught by were Flood risk and water environment, proximity to SSI (high sensitivity receptors within 20m and 250m) and Transport (3.2km to A22 with no road access). It is considered that the site is situated in a remote rural location and offers limited scope for further expansion. - The county council note that Lambs Business Park is closer to the SRN and that Lambs Business Park has access to off-road transport through the use of a railway sidings. This, in combination with its proximity to the SRN, makes it a preferential choice for allocation. Further to this, Hays Bridge Farm is accessed from the west off Brickhouse Lane, which connects to the A22 (Eastbourne Road). The existing location is unsuitable in transport planning terms and offers no sustainable transport options onto the rural public highway network, subsequently the County Highway Authority (CHA) does not recommend that this site is suitable for intensification of use. - Surrey County Council is aware that Lambs Brickworks 	No action arising.

Site nominator	Site	Comments	Response to comments	Any action arising
		<p>NCIs and listed buildings)</p> <ul style="list-style-type: none"> - Stated that Hays Bridge Farm scores more favourably on 6/10 of the indicators for the landscape and townscape character, visual amenity and historic environment when compared with Lambs. - Stated that that development at the Hays Bridge site would have less significant adverse impacts on human communities than the Lambs Brickworks site. - Stated that no information is provided as to why Hays Bridge Farm is scored as having a high sensitivity for water contamination, whilst land at Lambs brickworks is considered to have a medium sensitivity to water contamination. - In conclusion, they argue that in the context of the Site ID and Evaluation document and the draft Environmental and Sustainability Report, identical scoring arises, and that Hays Bridge Farm has less adverse impacts than Lambs Brickworks. 	<p>has a limit on the number of vehicle movements permitted to and from the site.</p> <ul style="list-style-type: none"> - The county council are aware that Lambs Business Park is identified as employment site in TDC Local plan economic needs assessment, and Hays Bridge Farm is not. The Lambs site is proposed for joint allocation to retain employment use. - Surrey County Council note that the information relating to the status of the Surface Water body catchment each site is located within is published by the EA, and may be found on the EA website. As stated in the Site ID and Evaluation doc, the SW body status of Hays Bridge is 'Poor', which contributes to making the site a less viable candidate for allocation than the Lambs site. 	
Chris Foss	Britaniacrest/Little Orchard Farm - 26 Reugate Road, Hookwood, RH6 0HJ	<ul style="list-style-type: none"> - Stated the site is active but not fully developed. - Stated that the site currently holds planning permission. - Accepting commercial/industrial, construction/demolition and domestic waste, crushing/screening and production of aggregates and soils, and bailing of residual waste for export. 	<ul style="list-style-type: none"> - This site was considered and rejected in the Site Identification and Evaluation document (Site ID:RE05) - This site was excluded from allocation at the secondary sieving stage during Site Identification and Evaluation. - It is considered that the site offers limited scope for further expansion, and any further expansion could be dealt with under Policy 8, enhancement or extension of existing sites. 	No action arising.
Resident	Land adjacent to the A25 and A22 next to Streets Court which was used when the M25 was being modified and now sits vacant.	<ul style="list-style-type: none"> - Land was used when the M25 was being modified and is now vacant. - Site has good access to the M25, and would cause less disruption to locals. 	<ul style="list-style-type: none"> - Land nominated by resident, not the landowner and no details of the landowner provided. - Site is located near to Godstone in Tandridge, - Green Belt and not previously developed land. 	No action arising.
Resident	Dunsfold Park, Stovolds Hill, Cranleigh, Surrey, GU6 8TB	<ul style="list-style-type: none"> - Landowner is Rutland DAL Limited 	<ul style="list-style-type: none"> - This is an allocated site in the recently adopted Waverley Local plan and as such is not suitable for allocation in the 	No action arising.

Site nominator	Site	Comments	Response to comments	Any action arising
		- The site is a large industrial site within a growth area.	<p>emerging SWLP.</p> <p>- Waste use may in principal be acceptable in employment areas</p> <p>- This site was considered and rejected in the Site Identification and Evaluation document (Site ID:WA21)</p>	
Resident	Old Brick Works Capel	- Site is away from residential centres and is already a brownfield site.	<p>- Land nominated by resident, not the landowner, and no details of the landowner provided.</p> <p>- Site is part of a former and potentially active mineral working This site was considered and rejected in the Site Identification and Evaluation document (Site ID:MO11) .</p>	No action arising.
Resident	Land at the former airfield, Wisley.	- Stated that the site has in the past been selected as a potential waste processing site.	<p>- Land nominated by unknown person, and no details of the landowner provided.</p> <p>- Site allocated in the Guildford Borough Submission Local Plan for a new settlement.</p> <p>- This site was considered and rejected in the Site Identification and Evaluation document (Site ID:GU31)</p>	No action arising.

Appendix 8 – Comments on Policies

Theme	Summary of Comments	Raised by	Response	Any action arising
Policy 1 - Need for non-landfill waste development	Waste should be managed effectively and in an environmentally sound manner.	Resident	Noted. The policies of the SWLP are intended to ensure this happen in Surrey.	No action arising
	Questions need for policy 1 (new sites) as some CRCs have reduced opening hours.	Resident	The need for new sites encompasses more than just CRCs. Other waste management uses are also planned for.	Check the plan is clear enough in explaining the range of management sites.
	Suggests that policy 1 should confirm that "...development will not be granted unless..."	NZ Golf Club	The WPA has positively worded this policy to ensure consistency with the NPPF.	No action arising
	Doesn't believe that Energy Recovery should be an option.	Resident	The waste needs assessment highlights a requirement for EfW capacity to manage residual waste. While the plan acknowledges a need for recovery capacity, it seeks to promote recycling capacity ahead of the need for recovery capacity. Recycling sits above recovery on the waste hierarchy and this is approach is therefore consistent with the directive and the vision for the draft SWLP (8.1.7).	No action arising
	It is unreasonable to expect Surrey to be net self-sufficient considering over population and expected housing growth in the south east.	Resident	planning on the basis of self-sufficiency is encouraged by European Waste Framework Directive and national planning practice guidance. The WPA also has a specific memorandum of understanding with other WPAs in the south east that each WPA will plan on the basis of net self-sufficiency. Under national policy the WPA is required to identify sufficient opportunities to meet the identified needs of its area for the delivery of waste management infrastructure. As set out in para 7.1.1 the plan's adoption of net self-sufficiency accepts that it is not practicable to deal only with waste produced in Surrey and that cross-boundary waste movements, including those from London, will be necessary to support the viability and efficient operation of waste management facilities.	No action arising
	Support for net self-sufficiency as it provides flexibility for cross border transfers.	South London Waste plan	The WPA acknowledges support for planning on the basis of net self-sufficiency.	No action arising
	Suggests explanations of NPPW and CD&E. Suggest not using acronyms and abbreviations in policies themselves.	Runnymede BC	The WPA agree and acknowledge that these changes can be made to aid the reader.	Expand acronyms / abbreviations at the earliest stage and don't use acronyms / abbreviations in policy text.
	Suggest consulting DEFRA 'national waste capacity study' to inform the plan / policy.	Resident	The WPA will reflect on this document when it is published - however, in accordance with national policy and guidance, the plan has been prepared based on a detailed, robust Waste Needs Assessment that considers the specific future requirements in Surrey based on the principle of net self-sufficiency.	Consider report when it is published.
	Argues that allocated sites should not have to demonstrate need for waste management capacity at an application stage as Surrey council will have already done this work when identifying a need	WT Lambs agent	The need can change over time and will have to be judged by most recent monitoring (AMR). It is also important to ensure that there is no oversupply of recovery capacity that could inhibit development of recycling capacity.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	within the plan.			
	Suggests there is conflict between policy 1 ii) and supporting text 8.1.5. In regard to meeting capacity as a minimum and applications not providing over capacity.	WT Lambs agent	The WPA acknowledge that there is a potential conflict with wording here.	Amend para 8.1.5 to say: "This means that Surrey should plan to provide sufficient capacity to adequately manage forecast waste requirements in accordance with the Waste Hierarchy."
	Suggests policy 1 should make reference to ensure technology is suitable for specific waste stream. Suggest specific reference to encourage biological treatment.	Guildford RA	Certain technologies will be suitable for certain waste streams and not all waste can be biologically treated. Policy 1 aims for sustainable management of waste which will include biological treatment of waste as appropriate.	No action arising
	Suggests that the plan make recognition to emerging and adopted local plan policies in the wording of the policies. This could include the addition of text such as "subject to compliance with other policies in the SWLP and where relevant demonstrate compatibility the adopted or emerging policies of other Local plans" after "permission will be granted" in several of the policies.	Reigate & Banstead BC	The WPA acknowledge these comments but disagree that it is necessary to make specific reference to the need for proposals to be consistent with other policies of the Development. This duplicates wording and, if not included in some policies might imply that other policies do not need to be taken into account. Paras 1.1.6 and 1.1.7 already make the position clear as follows: <i>"This plan forms part of the overall development framework for Surrey. Other waste and minerals related policy can be found in the Surrey Minerals Plan (2011), the Aggregates Recycling Joint Development Plan Document (2013) and the Minerals Site Restoration Supplementary planning Document (2011). The planning policy for non-waste and minerals related development can be found in the Local plans of the District and Borough Councils in Surrey.</i> <i>1.1.7 When determining applications all relevant policies of the development framework, as well as national policy, will be taken into account."</i>	No action arising
Policy 2 - New or improved recycling and recovery facilities	There is no evidence as to how policies will be achieved.	Resident	The policies are based on a robust evidence base and previous consultation on options and so are considered to be deliverable. Their achievement will be monitored through the Annual Monitoring Report (AMR) annually. Increases in recycling will be evidenced in the AMR as will an increase in recycling capacity.	No action arising
	Preventing & reducing waste has to be done at a national level in order to be achieved.	Resident	Acknowledgement that this is important. The Policy Context section details all relevant European and National policy and legislation, the plan has been prepared in line with these. Para 6.2.1 notes that "in preparing Local plans, waste planning authorities should drive waste management up the waste hierarchy. This means encouraging prevention of waste, preparing for re-use, recycling and recovery of waste."	No action arising
	Support for co-location being encouraged by policy 2.	Resident, WT Lambs agent	Acknowledgement of support.	
	Comments that policy / consultation is too complicated.	Resident	In an attempt to reduce the complexity an executive summary and guidance had been provided but it is acknowledged that there are technical elements to the plan and the consultation and the council will review the approach to help improve future consultations.	Review approach to future consultations.
	Comments that permission should not be granted just because a site is included in	CPRE Surrey, NZ Golf Club	Proposals for development on allocated sites will need full planning applications and be subject to the necessary detailed technical assessments of likely impacts. Para	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	the plan. Once the use is known, there needs to be detailed assessments of the likely impacts.		8.7.13 states: "All sites will be subject to a formal planning application process and will be required to demonstrate that they are consistent with the policies in this plan including the key development requirements."	
	Suggest policy 2 ii) could be restrictive to because co-location may not result in fewer lorry movements. Suggest this could conflict with policy 8. Respondent would prefer to see lorry movements covered on a case by case basis in policy 14.	Biffa Waste Management	Policy 2 ii) states benefits of co-location should be demonstrated which <i>may</i> include fewer lorry movements. The text therefore recognises that fewer lorry movements may not result from co-location.	No action arising
	Suggest abbreviations WDA, WCA should be expanded.	Runnymede BC	Acknowledgement that these can be expanded.	Expand acronyms / abbreviations at the earliest stage and don't use acronyms / abbreviations in policy text.
	Suggest at "(iii) there is a clear need for the development proposal having regard to the net supply of waste and the capacity of existing and planned waste management facilities within the County and the site is otherwise suitable for waste development when assessed against other policies within the SWLP."	WT Lambs agent	This is covered by Policy 1 that requires a clear need for a new facility to be demonstrated.	No action arising
	Suggests that policy should make clear that allocations made in the emerging SWLP are afforded priority in meeting the need for new waste facilities in Surrey, over unallocated sites being subject of speculative allocations.	WT Lambs agent	Although development on allocated sites is generally preferred, allocated sites located in the Green Belt will not have priority over suitable non Green Belt sites and proposals for development of Green Belt allocations will need to demonstrate that suitable non Green Belts sites are not available. This position will be made clearer in the plan.	Include text in plan to confirm that allocated sites located in the Green Belt will not have priority over other suitable non Green Belt sites and proposals for development of Green Belt allocations will need to demonstrate that suitable non Green Belts sites are not available.
	Comments that policy is too broad because it covers too many waste streams. Suggests that policy be split, one for recycling and material recovery and one for energy recovery.	Guildford RA	The WP A disagree. Policy two should not be split to cover different management streams (other than C, D & E Waste) as the criteria set out for new and improved facilities apply to all waste streams. Policies 3, 5 and 6 provide further policy on proposals for management of specific waste streams.	No action arising
	8.2.6 "Generally the county council is supportive of recycling and recovery operations where it can be demonstrated that facilities will not have adverse effects of amenity or environment. " It one thing to say Surrey CC supports a small community recycling facility, quite another to say it is "supportive of" large incinerator plants.	Guildford RA	The WPA will be supportive of waste development that manages waste further up the waste hierarchy and is suitable in regard to its surroundings and scale. This applies for all types of waste management facilities.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	Suggests removing the word 'may' and replace with 'should' or perhaps even 'shall'.	Resident	These are examples of benefits. Proposals may provide other benefits, not all can be listed in policy text.	No action arising
Policy 3 - New or improved facilities for recycling CD&E waste	There should be a method for residents to dispose of CD&E waste beyond kerb-side collections to reduce the risk of fly tipping.	Resident	The WPA acknowledges this comment and understands that there are concerns regarding fly tipping of CD&E waste. The plan intends to help reduce the amount of fly-tipped CDE waste by ensuring a sufficient number of authorised facilities can be developed. However this is an issue for the WDA and won't be covered in the plan.	No action arising
	Suggests there should be a free allowance for residents to dispose of small amounts of CD&E waste.	Resident	This is an operational matter to be considered by the WDA that provides CRC sites.	Comment referred to the WDA.
	Suggests CD&E waste can be used as hardcore in new developments.	Resident	The WPA agrees. The aim of policy 3 is for CD&E waste to be recycled with one use potentially being hardcore in new developments.	No action arising
	Questions whether 80% target can be improved, asks if the remaining 20% can be recycled.	Resident	The 20% of waste not recycled would be beneficially 'recovered to land', such as in the restoration of old mineral workings, as specifically allowed for in Policy 5.	No action arising
	CD&E waste is a major waste stream delivered to CRCs but opportunities for recycling are being reduced as CRC opening hours are being reduced.	Resident	The WPA acknowledges this comment. However CRC opening hours are an operational matter to be considered by the WDA that provides CRC sites.	Comment referred to the WDA.
	General support for policy 3.	East Sussex CC	The WPA acknowledge support of policy 3.	No action arising
	Concern that just because a site is allocated in the plan should not mean that detailed consideration is taken at the application stage.	CPRE Surrey	Allocated sites will be subject to full planning applications and require equal assessment to non-allocated sites at an application stage. Para 8.7.13 states: "All sites will be subject to a formal planning application process and will be required to demonstrate that they are consistent with the policies in this plan including the key development requirements."	No action arising
	Suggest the deletion of the words 'will be granted' and substitution of the words '...will need to demonstrate that' or alternatively "...will not be granted unless..."	NZ Golf Club	The WPA has positively worded this policy to ensure consistency with the NPPF.	No action arising
	Wish for the plan to reference importance of soil recycling at Patteson Court to safeguard operation.	Biffa Waste Management	WPA agree that soil recycling / pre-treatment is important. This issue is covered by Policy 7 – Safeguarding.	No action arising.
	Suggest that the definition for C, D and E waste could have been added earlier at policy 1.	Runnymede BC	C, D & E waste is defined earlier under Waste Management Context (See Paragraph 4.1.3)	No action arising
	Suggests that where possible reuse should be favoured over recycling (reusing bricks rather than crushing them)	Effingham PC	The WPA agree and would reassure the respondent that reuse is encouraged through the plan as it is further up the waste hierarchy than recycling. Especially see Policy 4.	No action arising
Support for policy 3 iii) encouraging	WT Lambs	The WPA agree with this comment and note that policy 3 iii) is essential for meeting	No action arising	

Theme	Summary of Comments	Raised by	Response	Any action arising
	development of CD&E recycling at minerals working restorations. This is important due to difficulties with sourcing inert waste without hosting a recycling operation.	agent	CD&E recycling capacity.	
	Questions benefit of co-location other than in aiding minerals restorations. Stating minerals working restorations would be the only likely development to achieve logistical and efficiency benefits of policy.	WT Lambs agent	The WPA disagree with this comment and would highlight benefits like combining soil treatment and CD&E recycling at a site to reduce lorry movements. In any event co-location associated with mineral restoration is an important activity.	No action arising
	Concern increased CD&E recycling targets will impact minerals site restorations. Suggest recognition that this will increase time periods on restorations.	WT Lambs agent	The WPA acknowledge that increased recycling targets will impact the amount of inert waste available for restoration. Paragraph 8.3.7 in the plan states "The approach within the SWLP is to encourage the sustainable management of waste in line with the waste hierarchy. As such, the SWLP promotes the recycling of inert material over the recovery of this material to land. Surrey County Council recognises the tension that may exist between supporting recycling of C, D & E waste and encouraging timely restoration, as ongoing recycling might slow down restoration and the fact this will increase restoration time limits. Temporary extensions are often granted to combat this."	No action arising
	Questions how a measurement indicator for waste arisings can be measured in the future if this has not been measured in the past.	Resident	Estimates of CDE waste have been made in the past. The AMR and LAA will be used to monitor arisings and recycling rates of this type of waste in future. This is in line with national policy.	No action arising
	Concern that policy for co-location of recycling facilities will prejudice restoration of minerals sites leading to unacceptable extensions of permissions. Comments that County Council must do more than just recognise a tension exists and policy is robust in ensuring co-location doesn't result in unacceptable extensions of permission.	Spelthorne BC	The WPA acknowledge that CD&E recycling has resulted in longer restoration periods, however this has to be balanced with the need to provide recycled aggregate which reduces the need for mineral working of primary aggregate. Furthermore these facilities are important for ensuring CDE waste is processed to produce clean inert non-recyclable material that is appropriate for restoration.	No action arising
Policy 4 - Sustainable construction and waste management in new developments	Suggests CD&E waste can be used as hardcore in new developments.	Resident	The WPA agrees. The aim of policy 3 is for CD&E waste to be recycled with one use potentially being hardcore in new developments.	No action arising
	Suggest clarification on who will use this policy (presumes districts & boroughs).	East Sussex CC	The WPA acknowledge this comment and agree that this policy will be implemented by districts and borough and borough councils. There is reference to districts and boroughs using the policy in the supporting text but it could be made clearer that these authorities will be expected to apply this policy when dealing with most planning applications.	Improve reference to districts and boroughs implementing this policy in supporting text.
	Suggest adding examples of what constitutes major development in practice.	East Sussex CC	A specific reference to major development is included (defined in the TCPO 2015). However it is considered that the preamble should make it clearer that this policy applies to major development and not all development.	Add text to section 8.3 to make it clearer that this policy applies to major development and not all development.
	General support for policy 4.	CPRE Surrey	The WPA acknowledge support for policy 4.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	Suggest that a site Waste Management plan, or a specific Environment Statement chapter is made a requirement of policy 4, as well as the Council's waste planning application validation check list.	WT Lambs agent	A site waste management plan could be submitted with a planning application to demonstrate compliance with the Policy. This will be explained in the supporting text.	Add information about the role of Site Waste Management plans in demonstrating compliance with Policy 4.
	Support for the provision of integrated storage within new developments for waste recycling.	WT Lambs agent	The WPA acknowledge support for policy 4.	No action arising
	Suggest that "will be supported" is confusing given that this policy will rarely be the main determinant as to whether a location is appropriate. We suggest this policy would sit more comfortably alongside other planning policy considerations if it read "Major development will demonstrate that:"	Guildford RA	All relevant policies need to be taken into account when considering a development and this is made clear in paragraph 1.1.7 that states: "When determining applications all relevant policies of the development framework, as well as national policy, will be taken into account." It is noted that other policies use the term "will be granted" rather than 'will be supported" and so to ensure consistency the term "will be granted" will be used.	Replace the term "will be supported" with "will be granted".
Policy 5 - Recovery of inert waste to land	General support for policy 5.	NZ Golf Club	The WPA acknowledge support for policy 5.	No action arising
	Suggests policy should also specify the importance of inert material for use in landfill operations. Inert material provides a necessary engineering material and an appropriate after-use of inert waste.	Biffa Waste Management	The WPA acknowledge this comment and would reassure the respondent the policy 5 includes landfill restorations as recovery. The WPA agree that this could be made clearer.	Amend para 8.4.2 as follows: "In Surrey, inert material derived from C, D & E waste is a valuable resource and when used in mineral site restoration as inert fill or as landfill capping material is considered to be a recovery operation" and amend Policy 5 as follows: "The recovery of inert waste to land is encouraged where this is necessary to implement minerals restoration and non-inert landfill restoration schemes."
	Comments on whether waste movements from South London Waste plan authorities will be able to continue.	South London Waste plan	The WPA acknowledge these comments and will respond in regards to these DtC comments. The plan does not inhibit the management of waste from South London in Surrey. Para 7.1.1 notes that the Spatial Strategy takes account of "Managing some waste from London and other surrounding counties; net self-sufficiency accepts that it is not practicable to deal only with waste produced in Surrey and that cross-boundary waste movements, including those from London, will be necessary to support the viability and efficient operation of waste management facilities."	Log as DtC
	Concern that 'other development' will reduce waste stream available for minerals restoration because 'other development' will require CD&E recycling on site, this takes material away from restorations.	WT Lambs agent	Minerals restoration often also involves on-site CDE recycling to produce clean inert material that can be used in restoration. It is accepted that the Policy could be strengthened to ensure restoration of mineral working is preferred over other recovery to land activities.	Amend policy to 'other development that will not prejudice mineral restoration activity... '
	Suggests policy should include requirement	Guildford RA	This is generally an operational matter dealt with by the Environmental Permit that is	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	for quality assurance that material being recovered is inert and not hazardous.		issued and enforced by the Environment Agency. In certain cases relevant conditions may also be applied to planning permissions.	
	Suggests that policy 5 could include provision inert waste to be used as sound barriers (bunds) alongside major highways. Suggesting green waste be used on top to provide a visual and environmental benefit.	Resident	The WPA agree and would reassure the respondent that provision for 'other development' covers this.	Add 'Landscaping and noise attenuation' to list of 'other recovery operations' included in paragraph 8.4.3
Policy 6 - Disposal of non-inert waste to land	Comments that there are many risks with burying non-inert waste and there are other technologies for methane recovery like digesters?	Resident	The WPA acknowledge these comments and highlight that land is not being allocated for landfill and the plan aims to move waste up the hierarchy away from disposal. Methane from landfills is carefully managed and used to create electricity. Paragraph 8.5.5 states: "Any application for landfill must provide details of how the site will be restored and any measures needed to manage landfill gas". In addition all non-inert landfills require Environmental Permits from the Environment Agency which ensures that any emissions do not cause harm to human health or pollution of the environment.	No action arising
	Suggests the deletion of 'will be granted' and include either 'will need to demonstrate...' or will not be granted unless..."	NZ Golf Club	The WPA has positively worded this policy to be consistent with the NPPF.	No action arising
	Support for policy 6 that it recognises the importance of landfill in achieving net self-sufficiency.	Biffa Waste Management	The WPA acknowledge support for policy 6.	No action arising
	Importance for policy 6 / plan to recognise future need for landfill to deal with waste streams from London/other authorities and comments it is unclear whether consultations on such waste movements have taken place.	Biffa Waste Management	Discussion and consultation with neighbouring authorities has been ongoing and is continuing. This is reported in the Duty to Cooperate statement.	No action arising
	Comments that Landfill is also an important way to deal with hazardous materials.	Biffa Waste Management	The WPA acknowledges this comment and agree there is a need to include text to confirm the potential use of landfill for dealing with hazardous waste streams.	Add supporting text stating importance of landfill when dealing with hazardous waste.
	Suggest para 8.5.2 should specifically refer to pre-treatment for landfill as some residues are not necessarily in stable form for landfill.	Guildford RA	Even though it is expected that only residues will be landfilled, unlike inert waste, non-inert waste may undergo further chemical and biological activity - such as that involved with the production of landfill gas. However the Environmental Permit issued by the Environment Agency ensures that any emissions (to water, air and land) will not result harm to the human health or pollution of the environment.	No action arising
	Do not support 0% target for household waste going to landfill and believes this will increase quantity of waste being incinerated. Comments that incineration requires landfill for bottom ash.	Guildford RA	The management of waste by incineration (with energy recovery) is preferred over the disposal of waste by landfill which is the least preferred form of waste management. This is because incineration involves significant energy production. Bottom ash can be recycled as an aggregate.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
Policy 7 - safeguarding	Concern regarding current CRCs closing and the resultant fly tipping because of this.	Resident	The WPA acknowledge the concern the respondent has regarding CRC closures and subsequent fly tipping. CRCs are the responsibility of the WDA.	No action arising
	Suggests that this policy might also safeguard sites with planning permission for waste management operations which have not yet been implemented.	East Sussex CC	Agree.	The policy and supporting text will be updated to ensure that sites with permission for waste management will be safeguarded for that purpose.
	Support for safeguarding where there it is required.	CPRE Surrey	The WPA acknowledge support for policy 7.	No action arising
	Support for safeguarding Martyrs Lane CRC.	NZ Golf Club	The WPA acknowledge support for the safeguarding of an existing site.	No action arising
	Do not support safeguarding of Martyrs Lane allocation.	NZ Golf Club	The WPA acknowledge this comment. The Martyrs lane site is currently safeguarded as an existing allocation in the 2008 plan.	No action arising
	Suggest that policy 7 needs to consider the impact on capacity from nearby uses not just total loss of site.	Grundons	Agree. Policy 7 will be reworded to make it clear that existing and planned sites should be safeguarded from new development proposed near to existing and planned waste facilities. This would be consistent with proposed changes to the NPPF concerning 'Agents of Change'.	Amend Policy 7 to ensure existing and planned sites should be safeguarded from new development proposed near to existing and planned waste facilities.
	Suggest that consideration of non-waste related development is included as an indicator in table 17. Strengthening policy 7 with this will be in line with national policy and reduce risk to Patteson Court landfill site from residential development.	Biffa Waste Management	Agree. An additional indicator will be included in Table 17.	Add the following additional indicator to Table 17: "Number of safeguarded waste where planning permission has been granted to non-waste development nearby contrary to advice from Surrey County Council as the WPA"
	Information provided on safeguarded waste sites in Hampshire near the Hampshire/Surrey border. Noted that nearly 51,000 tonnes of waste from Surrey was managed at some of these sites. Confirmation that there is no reason that sites reported as managing waste from Surrey cannot continue to do so.	Hampshire CC	The WPA acknowledge these comments from Hampshire CC and will log them as engagement in accordance with DtC.	Log as DtC.
	Comments that land owner has no interest in developing Wisley site for waste use and does not regard safeguarding policy for site.	Wisley Property Investments	In light of the fact that the landowner has no interest in the site for waste use and the allocation of the site in GBC submission local plan, the WPA will not object to non waste development. Once the SWLP has been adopted this site will lose its status as a site allocated for waste management use.	No action arising
Comments that para 8.6.4 notes safeguarding "does not rule out alternative development" and "the presumption is that waste development should be safeguarded." A mechanism for what would	WT Lambs agent	The WPA Agree. The Policy needs to be clearer about the circumstances when alternative development would be allowed.	Add wording to the Policy to make it clearer about the circumstances when alternative development would be allowed.	

Theme	Summary of Comments	Raised by	Response	Any action arising
	be considered suitable alternative development and whether this would be concurrent with waste management uses is not provided for in the policies. Para 8.6.4 weakens the presumption for waste management uses of allocated sites.			
	Suggest change of wording to state that safeguarding is a policy consideration not a material consideration. (In line with s.38 (6)).	WT Lambs agent	The WPA disagree - policy considerations fall under the heading of material planning considerations. Government guidance states: "How must decisions on applications for planning permission be made? To the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70(2) of the Town and Country planning Act 1990 and section 38(6) of the planning and Compulsory Purchase Act 2004 – these provisions also apply to appeals)."	No action arising
	Comments that policy 7 is irrational as if site is no longer required, permitted rights would override safeguarding policy.	Resident	The WPA disagree if the site has been developed, is allocated or has planning permission for a waste use then permitted rights for other uses would not exist.	No action arising
	Suggest clarification is required that temporary sites are not safeguarded under policy 7.	Spelthorne BC	There is a need to make the position regarding temporary sites clearer. Temporary sites have safeguarded status for as long as their permission exists.	Amend supporting text and/or the policy to make position on safeguarding temporary sites clearer.
	Support for safeguarding to ensure the provision of suitable waste management infrastructure.	Spelthorne BC	The WPA acknowledge support for policy 7.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
Policy 8 - Enhancement or extension of existing facilities	Questions whether there is a wide enough reference point with regards to key organisations providing evidence on enhancement. Asks if WPA should also be contacting key environmental organisations in the area.	Resident	It is acknowledged that this comment and would reassure the respondent that proposals for enhancement and extension are subject to full planning applications that will provide key & local organisations the same opportunity to comment as they would on new sites.	No action arising
	Comments from TFL with concerns that expansion to Charlton Lane facility may impact on the land required for Crossrail 2.	TFL	It is acknowledged that this comment and it will be logged under DtC. Any proposal to expand the facility would need to take into account any impact on Crossrail 2 so this could be considered in any decision to grant planning permission.	Log as DtC
	Concern that types of potential expansion aren't listed and that this may lead to different unsuitable waste use expansions at current facilities.	Mole Valley DC	The respondent should be reassured that expansion / extension proposals would be subject to full planning applications which would restrict unsuitable development. Policy 8 expects proposals for enhancement and extension of existing facilities to demonstrate benefits to the local amenity and environment.	No action arising
	Suggest a list of current sites in waste management use be listed within the plan. Stated they had difficulty finding this information.	Mole Valley DC	It is acknowledged that these comments and will ensure an accessible list of current sites is available.	Include, and update, list of existing waste facilities in the Annual Monitoring Report
	Suggest wording is changed by putting 'and' at the end instead of 'or' to make policy 8 sound.	CPRE Surrey	Expansions to recycling facilities do not need to demonstrate that waste will be managed further up the waste hierarchy. The Policy allows for a reduction in capacity only if waste is managed further up the hierarchy.	No action arising
	Suggest deletion of the word 'generally' in reference to enhancement being within the current footprint of the site. Use of 'generally' in regard to enhancement being within the footprint of the site is unclear and restrictive due to increases in site area being subject to development management policies.	NZ Golf Club and Biffa Waste Management	The wording of the Policy will be reviewed to ensure it is effective.	Review wording of Policy 8
	Suggests that policy 8 should not limit expansion in terms of capacity. As there are limiting factors to capacity (EA permits).	Grundons	Agree and would reassure the respondent that enhancement will also be encouraged where other benefits result or where waste is managed further up the waste hierarchy.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	Support for expansion of sites as they are currently located away from residents with established transport routes.	Effingham PC	It is acknowledged that support for policy 8.	No action arising
	New proposals should consider rail access.	Effingham PC	Transport of waste to and from sites is considered specifically by Policy 15 which expects opportunities for transport by rail to be considered. This would also be applied when proposals for extensions to sites are considered.	No action arising
	Concern that policy will restrict uses at Lambs BP from CD&E recycling to EfW due to policy requirement for no capacity loss and movement up the waste hierarchy.	WT Lambs agent	The allocation of the site in the plan will specify the uses that site can be used for and this may include EfW (to be confirmed following detailed assessment) - such strategic allocation for EfW would override Policy 8 though, at the time of the application, it would be necessary to demonstrate that there was a continued for need for energy recovery (in accordance with Policy 1).	No action arising
	Wish for larger site allocation of Lambs BP due to policy 8 requirement of expansion generally being within the footprint of the site.	WT Lambs agent	The size of the allocated site will be reviewed in light of comments received.	Review area of Lambs Business Park allocation
	Concern that policy is too vague. Clarification on whether “enhancement or extension” supports a new process higher up the hierarchy or expansion of an existing process that is compatible with the hierarchy	Guildford RA	It is acknowledged that these comments and would confirm that policy 8 supports both a new process up the hierarchy and intensification of a current activity that brings more capacity.	Review Policy 8 to ensure it is as clear as possible.
	Suggests policy is unnecessarily restrictive. States policy should make it easier to enlarge sites to reduce impact of finding new ones.	Resident	The WPA disagree and would draw the respondent's attention to the positive nature of the policy which is intended to encourage enhancement of current sites. For the WPA to be supportive however some benefits must be achieved e.g. Capacity or environmental benefits. Also note that Strategic Objective 4 which is: "To retain and make best use of existing sites for waste development through safeguarding against non-waste development and supporting improvement of facilities."	No action arising
	Suggest clarification that policy for enhancement does not apply to temporary sites. Concern that enhancement will lead to sites becoming established and they won't be fully restored.	Spelthorne BC	In certain cases certain types of enhancement may be appropriate at temporary sites. The temporary nature of sites will be taken into account when any proposals are considered and this will be clarified in the text.	Add text to confirm that the appropriateness of enhancements and extensions will take account of any time limits relating to the operation of sites.
Policy 9 - Green Belt	Comments that only brownfield sites should be allocated and there is sufficient brownfield land in Surrey.	Resident	While brownfield sites are preferable, extensive site identification and assessments haven't identified sufficient brownfield land to meet future waste management needs. Applications for development on Green Belt allocations will have to demonstrate that alternative suitable brownfield sites are not available.	No action arising
	Suggest wording “If the site also lies within the Surrey Hills AONB, in balancing whether very special	Surrey Hills AONB Board	Protection of AONB is sufficiently covered in the NPPF and in policy 14 both of which would need to be taken into account when considering proposals which might have an impact on AONB.	No action arising

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	circumstances are considered to outweigh the inappropriateness of such facilities in the Green Belt, great weight will be given on the other hand to whether the proposed development would conserve the landscape and scenic beauty of the AONB".			
	Concern that policy could lead to a large loss of Green Belt and that this needs to be considered further.	Resident	The WPA agree that some Green Belt land could be lost. This is balanced against the need for waste management capacity and the lack of suitable non Green Belt sites as defined in the very special circumstances which is consistent with national policy protection of Green Belt land. The plan states in paragraph 8.7.4: "...it is not considered possible to meet the anticipated waste management needs of the county without developing waste management facilities on Green Belt land. The overarching need for waste management in Surrey combined with a lack of suitable alternative sites outside the Green Belt and the need to locate facilities close to sources of waste are reasons why it is considered that very special circumstances may exist allowing development within the Green Belt. 8.7.5 Mineral development is not inappropriate development in the Green Belt, provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. Waste development which is related to the restoration of mineral sites can play a positive role in the objectives of the Green Belt. For example, restoration can result in a suitable after use of a site with opportunities for access to restored open countryside."	No action arising
	Concern that Policy 9 pre-empts waste development on Green Belt and policy 9 could trigger other inappropriate developments.	Resident	Developments on Green Belt land will still be subject to full applications and have to prove very special circumstances as well as minimising the impact they have on the Green Belt. Policy 9 will not trigger other inappropriate development as it solely relates to waste development.	No action arising
	Concern that very special circumstances defined in policy 9 aren't strong enough.	Resident	The very special circumstances are considered to be consistent with national policy on the protection of Green Belt.	No action arising
	Consider it to be highly unlikely that other sites will be required. There will need to be a detailed assessment of the impacts before deciding if a site is suitable for the proposed process.	CPRE Surrey	The Waste Needs Assessment indicates that there will not be sufficient waste management capacity in Surrey over the life of the plan period and so new facilities are likely to be required. All planning applications for waste management facilities will need to be accompanied by a detailed assessment of potential impacts.	No action arising
	Need to ensure proposals are assessed against other policies in the development plan.	NZ Golf Club	Agree. The plan confirms this in paragraphs 116 and 117.	No action arising
	Support that policy provides flexibility, especially in regards to the proximity principle.	Biffa Waste Management	It is acknowledged that support for policy 9.	No action arising
	Comments that reference to not being able to meet future need without	Resident	It is acknowledged that the respondent's concern. The needs assessment and detailed site assessments and evaluation revealed future waste management needs	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	developing on the Green Belt is defeatist and likely to prejudice future planning decisions.		are unlikely to be met without developing on Green Belt. Future planning decisions will be made in line with the plans policies and if developments can demonstrate very special circumstances. The plan states; 8.7.4 However, it is not considered possible to meet the anticipated waste management needs of the county without developing waste management facilities on Green Belt land. The overarching need for waste management in Surrey combined with a lack of suitable alternative sites outside the Green Belt and the need to locate facilities close to sources of waste are reasons why it is considered that very special circumstances may exist allowing development within the Green Belt. 8.7.5 Mineral development is not inappropriate development in the Green Belt, provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. Waste development which is related to the restoration of mineral sites can play a positive role in the objectives of the Green Belt. For example, restoration can result in a suitable after use of a site with opportunities for access to restored open countryside.	
	Support for recognition that Green Belt is required to meet capacity gap.	WT Lambs agent	It is acknowledged that support for policy 9.	No action arising
	Desire for policy 9 not to require allocated sites to demonstrate 'very special circumstances' suggesting this has already been done through work selecting the site and identifying the need.	WT Lambs agent	A need has currently been identified but applications will need to demonstrate, at the time they are made, that a need based on the most current waste data exists in order to demonstrate very special circumstances.	No action arising
	Wording on the approach to special circumstances is unclear.	Guildford RA	The WPA disagree and argue the wording to the approach is clear. Policy 9 details factors which may contribute to very special circumstances.	No action arising
	Argues that sites allocated (in current plan) that were in the Green Belt struggled to come forward because of demonstrating very special circumstances. This has led to a lack of allocated sites getting planning permission.	Bridge Court Holdings	It is acknowledged that these comments. However they would suggest that the nature of the proposals on some of these allocated sites has led to a lack of permission being granted not just that they were unable to prove very special circumstances.	No action arising
	Suggest policy 9 should include 'New or extended proposals should preserve the openness and character of the Green Belt and improve the attractiveness and setting of that location as well as demonstrate very special circumstances.'	Reigate & Banstead BC	The key characteristic of Green Belt is its openness and so there is to need to separately refer to its character. Impacts on the setting and attractiveness of the location are addressed in Policies 13 and 14.	No action arising
	Concern that previously allocated sites are allocated again without proper consideration. For a 'tilted balance' argument potential uses and current	Reigate & Banstead BC	Proper consideration has been given to the identification of sites - the sites proposed for allocation were selected from an original long list of 200 sites. The process is set out in the Site Identification and Evaluation report.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	external factors must be considered.			
	Suggest wording in policy 9 be more closely aligned with the wording set out in the NPPF and make it clear that "very special circumstances" have to be demonstrated for each and every proposed development in the Green Belt which has to be considered on its own merits so that "the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. The factors which have been listed in the policy are not the only factors which should be taken into account.	Spelthorne BC	It is acknowledged that these comments. The factors listed in the policy is not intended to be an exhaustive list of the very special circumstances. Agree wording needs to more closely align to that in the NPPF to ensure consistency.	The policy will be amended as follows: (delete text in purple italics add text in bold and underlined) "Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist <i>such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm.</i> <u>'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</u> "
	Acknowledges that policy makes reference to the positive role of waste development in relation to the restoration of mineral sites in the Green Belt. Concern that with extended restoration timescales due to recycling impact the benefits of restorations and suggest that timescales are imposed so that there is a clear expectation of when temporary uses will cease and when the benefits of restoration will be achieved.	Spelthorne BC	The need to balance increased production of recycled aggregate with the need to restore mineral sites in a timely fashion is recognised by the plan which states at paragraph 8.3.7 that states: "The approach within the SWLP is to encourage the sustainable management of waste in line with the waste hierarchy. As such, the SWLP promotes the recycling of inert material over the recovery of this material to land. The tension that may exist between supporting recycling of C, D & E waste and encouraging timely restoration is acknowledged, as ongoing recycling might slow down restoration."	No action arising
Policy 10 – Strategic Waste Site Allocations-	Objection to the non-allocation of current Trumps Farm composting site that is operated by Colliers Environmental.	Colliers Environmental Services	The site was considered as part of the site identification exercise undertaken by the WPA. The site was removed for the following reasons as set out in 4.2.10 of the Site ID & Evaluation report 'There is scope for some rationalisation of composting and green waste operations but only limited scope to increase capacity hence it is not recommended for inclusion in the emerging SWLP.'	No action arising
	There is currently too much flexibility in the plan. The plan should make it clear what types of waste management use would be suitable for development at each of the allocated sites. Some groups will not feel able to comment on the sites	Resident, CPRE Surrey, Guildford RA, Tandridge DC, Spelthorne BC,	The SWLP preparation so far has identified sites that are potentially most suitable in principle. Technical assessment work is being undertaken to establish which types of waste management facility would be suitable for development at the proposed allocated sites.	Update Annex 1 to confirm which types and scale of waste management facility would be suitable for development at the proposed allocated sites

Theme	Summary of Comments	Raised by	Response	Any action arising
	without knowing what is proposed and the scale of the development.	Runnymede BC		
	Comments that there should be no assumption that planning permission will be granted.	CPRE Surrey	It is acknowledged that these comments and would reassure the respondent that allocated sites will be subject to full applications. They are sites identified as most suitable for accommodating waste management uses and do not assume permission will be granted. Paragraph 8.7.13 states: "All sites will be subject to a formal planning application process and will be required to demonstrate that they are consistent with the policies in this plan including the key development requirements."	No action arising
	Suggests that applications must demonstrate they are consistent with the policies of the local development plan not just the provisions of the SWLP.	NZ Golf Club	Agree. The plan confirms this in paragraphs 116 and 117.	No action arising
	Suggests policy is worded "planning permission will only be granted for the development of waste facilities at the following strategic waste sites if the applicant can demonstrate to the satisfaction of the county council that the proposals is consistent with other policies of the Waste plan and the key requirements for each of the sites have been fully addressed".	Woking BC	The policy is positively worded (to be consistent with the NPPF) while ensuring proposals must be consistent with policies in the development plan and address the key development criteria.	No action arising
	Support the exclusion of Wisley Airfield from allocations.	Wisley Property Investments	Support is noted.	No action arising
	Comments that consultation is flawed highlighting people being asked to comment on other areas without having any local knowledge in particular.	Resident	The consultation does not assume that all those responding will have detailed knowledge of all the sites. Objective information is presented on the merits of each site and why it was selected in the Site Identification and Evaluation Report - this intended to allow anyone to comment on the merits of all the sites.	No action arising
	Acknowledgement that further assessment will be done to establish appropriate potential uses on sites. Assessments should also consider the realistic mediations and the particular circumstances, surroundings and planning characteristics of the locations which may be affected.	Reigate & Banstead BC	It is acknowledged that these comments. Assessments will establish what uses may be acceptable on sites taking into account the potential for mitigation of impacts. Detailed impact assessment of proposals with information on mitigation will be assessed at the application stage.	No action arising
	Support for current 2008 SWP and policy WD2 that excludes thermal treatment being appropriate. Desire for this to be continued in new SWLP.	Reigate & Banstead BC	It is acknowledged that these comments. Technical assessment is currently being undertaken to establish they types of waste management facility that could be developed at each site without causing unacceptable impacts.	No action arising
	Acknowledgement that policy 10 is not	Spelthorne BC	The WPA would reassure the respondent that acceptable uses at sites will be	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	technology specific but consider it important to give guidance of the scale of developments which would be acceptable on sites.		disclosed once detailed assessments have been undertaken.	
	Concern that site 8 (Lambs) will fail to meet the sustainable transport objectives	Resident	Transport Assessment of this site is being undertaken to establish its suitability in terms of the sustainable transport objectives.	Update Annexe 1 with the outcomes of the Transport Assessment.
	Concern that the Lambs Business Park site is unsustainable and environmentally unsound	Residents	This comment is acknowledged. All of the allocated sites in the SWLP are assessed as part of the Environmental and Sustainability Report, which deals with Strategic Environmental Assessment and Sustainability Appraisal.	No action arising.
Policy 11 - Other areas suitable for development of waste management facilities	Object to policy 11 making provision for possible waste development on established employment sites. Comments that waste related development could have a significant negative impact on employment areas within the borough.	Surrey Heath BC	It is acknowledged that these comments. Other policies of the plan, in particular Policy 14, would ensure that proposals for waste development on established employment sites would only be permitted if it were demonstrated that the site could be operated without causing unacceptable impacts. The WPA would seek to work with Surrey Heath BC at an application stage to avoid policy conflict.	After targeting consultation with districts and boroughs, include list of industrial estates in the plan which have been assessed as having potential for development to take place without causing unacceptable impacts
	Comments that development should be on brownfield sites only and the Green Belt must be preserved or that Green Belt is inappropriate for waste management sites.	Resident	While brownfield sites are preferable, extensive site assessments haven't identified insufficient brownfield land to meet future waste management needs. The plan states at paragraph 8.7.4: "... it is not considered possible to meet the anticipated waste management needs of the county without developing waste management facilities on Green Belt land. The overarching need for waste management in Surrey combined with a lack of suitable alternative sites outside the Green Belt and the need to locate facilities close to sources of waste are reasons why it is considered that very special circumstances may exist allowing development within the Green Belt."	No action arising
	Believes waste processing located inside buildings in previously developed areas is preferable to the development of new sites in the countryside.	Resident	The WPA agree that these areas are preferable for waste development and indoor activities are encouraged where they mitigate negative impacts. However work to identify potential sites has revealed that future requirements for waste management capacity are unlikely to be met by development on brownfield sites alone. Many of the allocations are located on land that would generally not be described 'countryside'.	No action arising
	Disagrees with policy, states that brownfield land can often include garden land that is inappropriate for waste development, also industrial estates can be inappropriate e.g. B1 accommodating composting.	CPRE Surrey	Inappropriate waste uses will not be granted permission on industrial estates or garden land as these would not satisfy other policies of the plan, in particular Policy 14. All proposals will be subject to full applications and need to be consistent with other policies in the plan if they are to be permitted.	No action arising
	The Policy will allow sites to come forward without similar scrutiny to allocated sites. Sites could be advanced without the same level of public consultation as allocated sites.	NZ Golf Club	All proposals for waste development would be subject to full applications accompanied by assessment of potential impacts and would require consultation. Proposals will not be granted permission unless they are consistent with the policies of the development plan.	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	Sites must come forward on the basis that they have been reviewed as part of the plan consultation and adoption process and that proposals have to be considered against the wider development plan and not just the SWLP (as required by Policy 11 (iii).	NZ Golf Club	Not all waste management capacity can come from allocated sites due to development being market driven. Smaller facilities in particular may be suitable for development on smaller non allocated sites. This policy therefore allows for flexibility in the way that waste management capacity can be developed. Paragraph 1.1.6 of the plan states: "This plan forms part of the overall development framework for Surrey. Other waste and minerals related policy can be found in the Surrey Minerals Plan (2011), the Aggregates Recycling Joint Development Plan Document (2013) and the Minerals Site Restoration Supplementary planning Document (2011). The planning policy for non-waste and minerals related development can be found in the Local plans of the District and Borough Councils in Surrey. <u>1.1.7 When determining applications all relevant policies of the development framework, as well as national policy, will be taken into account.</u> "	No action arising
	Concern that there is potential conflict between policy 11 and policy IE2 of Runnymede Local plan which seeks to safeguard B use land for employment.	Runnymede BC	The council consider that certain proposals for waste management might be suitable for development on allocated employment land. Other policies of the plan, in particular Policy 14, would ensure that proposals for waste development on established employments sites would only be permitted if it were demonstrated that the site could be operated without causing unacceptable impacts.	No action arising
	Suggests that policy 11 should include a requirement for applications on non-allocated sites to have regard to the County's net waste arisings and capacity of facilities. This is to ensure the development of waste management facilities is plan-led.	WT Lambs agent	The WPA agree. The plan requires all sites (allocated and non-allocated) to prove the need for development against the latest assessment of waste management capacity requirements - see Policy 1.	No action arising
	Concern that policy 11 is too vague. The text "development of facilities to meet identified shortfalls in waste management capacity" on "redundant agricultural and forestry buildings and their curtilages" could be appropriate or could give rise to inappropriate development. States that policy is not clear enough to achieve desired outcome without having a negative effect on the countryside.	Guildford RA	Policy 11 is positively worded to support development on previously developed or industrial land away from greenfield sites and Green Belt. Other policies of the plan, in particular Policy 14, would ensure that proposals for waste development on would only be permitted if it were demonstrated that the site could be operated without causing unacceptable impacts.	No action arising
Policy 12 - Waste Water Treatment Works	Concern for capacity of Horley STW (Lee St) in regards to new housing and limited space for development on the STW. Odour from STW is getting more frequent.	Resident	It is acknowledged that the respondents concern. Lee Street STW is run by Thames Water and as the sewerage undertaker it is their responsibility to ensure capacity at the site. Odour nuisance should be reported to the Environment Agency that is responsible for regulating emissions from the facility. Any expansion of capacity would require planning permission that would be considered against all the policies of the development plan.	No action arising
	Concern that policy 12 doesn't adequately consider planned increase in	Resident	The sewerage undertaker will review capacity of existing sites and their ability to manage wastewater in future using the best available data including housing	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	homes.		allocations. This flexible policy allows for expansion where it is needed.	
	Comments on current situation at Cranleigh STW - Concern that current capacity is insufficient. Mention working party that has been set up. Note that capacity at STW is a limiting factor to development in the area and issues with infrastructure like the pumping station at the end of Cranleigh Rd.	Ewhurst & Ellens Green PC, Resident	The sewerage undertaker will review capacity of existing sites and their ability to manage wastewater currently and in future using the best available data including housing allocations. This flexible policy allows for expansion where it is needed.	No action arising
	Strongly disagree with policy. Understand need for new sites but states it is unacceptable to grant planning permission automatically without looking at the implications of the proposed use on the site and its surroundings.	CPRE Surrey	Proposals at new and existing sites would need to be consistent with all the relevant policies of the development plan which includes those intended to ensure that no unacceptable impacts would occur as a result of the development - see Policy 14 in particular.	No action arising
	Comments that reference to Guildford Boroughs 'proposed submission local plan' should be changed to 'submission local plan'.	Guildford BC	It is acknowledged that this comment and will alter text accordingly.	Para 8.8.3 remove 'proposed'.
	Support for the identification of the new (Guildford) wastewater treatment works and in particular including the land for future expansion.	Thames Water	It is acknowledged that support for policy 12.	No action arising
	Suggests policy 12 be amended to read "The upgrading or expansion of existing wastewater/sewage treatment works will be supported, either where needed to serve existing or proposed new development, or in the interests of long term and wastewater management." to be in line with national policy.	Thames Water	The WPA agree in principle.	Add appropriate text to Policy 12
	Suggests policy 12 could provide similar support for upgrades/extensions at existing wastewater and sewage treatment works.	Thames Water	The WPA would suggest that as written policy 12 adequately supports upgrades and extensions. The policy states; ...new...or for the improvement or extension of existing...	No action arising
	Policy 12 should recognise that some of these works are in locations with very high flood risk which may not be appropriate for a larger modern biogas plant.	Guildford RA	The risk of flooding caused by any proposed development would be considered at the planning application stage to ensure that unacceptable flooding impact do not occur as set out in policy 14.	No action arising
	Disagrees with policy making provision for STW to expand at other sites due to	Resident	Policy 12 is designed to make expansion acceptable where required. Policy 12 does not make provision for engineering or technical details of STWs. It will be up to	No action arising

Theme	Summary of Comments	Raised by	Response	Any action arising
	them being gravity fed. Statement on expansion is unsuitable in this context.		industry and operators to decide if sites are capable of expansion.	
	Suggests that policy 12 should refer to what the WPA consider should happen to WWTW that are likely to become redundant during the plan period. Concern that these sites shouldn't just be allocated for another waste use.	Reigate & Banstead BC	The WPA has consulted the water companies responsible for operating WWTWs in Surrey and is not aware of any WWTW sites ceasing operations during the plan period. These sites would be safeguarded until the waste use ceases.	Consider amending wording of the Policy or Policy preamble to provide further clarity.
Policy 13 - Sustainable Design	General support for Policy 13.	Residents, CPRE Surrey	It is acknowledged that support for policy 13.	No action arising
	Comments that the most modern techniques (not the cheapest) to reduce smell, noise, etc. must be adopted.	Resident	This is addressed by the policy that states: "planning permission for waste development will be granted where it can be demonstrated that development follows best practice for built design". The provisions within policy 13 and other policies will require technologies that bring the most benefit and smallest negative impact.	No action arising
	Suggests policy 13 is contradictory as the development of a waste management facility cannot by definition make a positive contribution to the quality of the local environment unless that environment has already suffered degradation from another undesirable use. Suggests mitigation measures are of little concern considering the negative impacts of waste development.	Resident	Biodiversity gains for example can be created as part of sustainable design even on land that wasn't already degraded. The mitigation measures are essential to ensure that waste developments are sustainable during construction and throughout their operational life. National planning Policy for Waste (NPPW) aims to ensure any waste management facilities are a positive contribution to communities and to balance the need for waste management facilities with the interests of the community (3.2.9). The plan seeks to ensure that all new development is of a high standard. It encourages well-designed schemes which will make a positive contribution to the quality of the of the local environment (8.9.3)	No action arising
	Suggests that policy 13 should be cross linked to policies proposing new development.	CPRE Surrey	The WPA agree. Policy 13 would be considered against applications for new waste development.	No action arising
	Suggests amending wording to "planning applications for waste development will need to demonstrate that the proposals follow....."	NZ Golf Club	The WPA has positively worded this policy to be consistent with the NPPF.	No action arising
	The monitoring measure and target refers to design guidance which has not been detailed in the plan so this cannot be assessed.	Grundon Waste Management	This comment is acknowledged. The Design Guidance will be produced once the plan is adopted and will be used in monitoring.	Clearer reference to the availability of the Design Guidance will be included in the plan
	Would like to see Policy 13 reflected more in the vision statement.	Resident	Agree that specific mention to best practice design could be included in the Vision statement.	Consider mentioning best practice design in the Vision statement.
	Section iii) refers to 'necessary' landscaping and biodiversity gains, however there doesn't seem to be a definition of what 'necessary' means in this context. Clarification should be	Natural England	The expectation of net landscaping gains are dependent on the scale and nature of proposals. Inclusion of expectations in policy 13 could restrict consideration of such matters at the appropriate stage.	Add supporting text to clarify WPA approach to assessing what it would consider to be appropriate in terms of landscaping and biodiversity gains

Theme	Summary of Comments	Raised by	Response	Any action arising
	included to establish what is expected of developments in terms of net gain and landscaping.			
	Any waste processing that potentially emits chemicals should not be considered. Technology can fail, and unless strict, unannounced environmental checks are made on a regular basis, there is potential for lax management of emissions	Salfords & Sidlow PC	Any waste management facility would need to obtain an Environmental Permit issued by the Environment Agency which is intended to ensure that emissions from such facilities do not cause harm to human health or pollution of the environment. The plan states; impacts related to waste activities including dust and fumes should consider sensitive receptors as well as the extent to which impacts can be mitigated (8.9.11). And further covered in Policy 14.	No action arising
	Suggest that policy wording be changed to "will demonstrate" rather than "will be granted where it can be demonstrated". This policy sits alongside others rather than being a sole determinant.	Guildford RA	The WPA has positively worded this policy to be consistent with the NPPF. Policy 13 must be considered along with other policies in the plan.	No action arising
	Concern that any proposal should clearly state how any waste strategy should protect, maintain or even help improve the status of biodiversity in Surrey	Resident	This suggestion is acknowledged. The plan states...all waste development should demonstrate that the development...includes necessary landscaping and biodiversity gains (Policy 13). In delivering biodiversity enhancements, measures should be taken to contribute to the Green Infrastructure network to maintain existing habitats and to enhance habitat connectivity. Production of a Green Infrastructure master-plan should be considered for large scale developments (8.9.34). The positive role that high quality new development can play in providing new habitats and increasing biodiversity is recognised and development should include measures for the enhancement of biodiversity where justified by the nature of the proposal. Any creation, enhancement, and management of habitats, ecological networks, and ecosystem services should be consistent with wider environmental objectives (8.9.35).	Add mention of biodiversity to text related to Strategic Objective 6.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
Policy 14 – Development Management	Highlights that the plan covers Aerodrome safeguarding matters - Imperative that these references are retained to ensure there is no danger to air safety	Gatwick Airport Limited	It is acknowledged that these comments and would reassure the respondent that these references will be retained.	No action arising
	Argues that there needs to be wider consultation with other interest groups when looking at impact on biodiversity	Resident	A wide range of interest groups have commented on this draft policy and their comments have been taken into account. They will also be able to comment on any applications when they go out for consultation.	No action arising
	Concern over who is defining the word - "unacceptable" - different notions	Resident	Acceptability of impacts are determined in light of relevant national policy and guidance and previous decisions and case law as well as advice from statutory bodies such as the Environment Agency, Historic England and Natural England . It is the	No action arising

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
			planning Committee's roles to weigh the impacts and benefits of proposals when reaching a decision on acceptability.	
	Argues that the health of residents must be fully considered, therefore no development should be considered close to homes	Resident	The health of residents is covered under policy 14 'general amenity' and applications must demonstrate they will not have an unacceptable impact on residents' health.	No action arising
	Argues that the most modern/sophisticated (not the cheapest) to reduce smell/noise etc. must be adopted	Resident	The plan seeks to ensure waste management developments have minimal negative impacts. Proposals will need to demonstrate technologies that align with this.	No action arising
	Concern that suitable assessments must be made of effects of landfill on groundwater during flooding conditions, not just normal conditions	Resident	This will be assessed at the application stage.	No action arising
	Suggests that the two sites suggested in Runnymede could be used to grow crops so we are less reliant on imports, post Brexit	Resident	It is acknowledged that these comments. The loss of any agricultural land has to be balanced with the need to development sufficient waste management capacity to meet requirements. The plan prefers the development of brownfield sites over greenfield and any proposals for development on Green Belt sites will need to demonstrate that no alternative suitable brownfield land is available.	No action arising
	Concern that the aim is straightforward - but exactly how and where waste will be managed less so and less definite	Resident	The plan, through its policies and allocations identifies suitable locations for waste to be managed. Policies clearly encourage management of waste up the hierarchy this can involve a range of technologies.	No action arising
	Suggested that "with particular attention being given to protecting the AONB where applicable" should be inserted into the end of (v) Policy 14 (p.69)	Surrey Hills AONB Board	The Council wishes to ensure that emphasis is given to protecting the AONB.	Consider amending Policy wording.
	Suggests that Policy 14 should come earlier in the document	CPRE Surrey	The policy's position in the plan has no effect on the weight given to it.	No action arising
	Shows general support for the policy	CPRE Surrey, Runnymede Borough Council and Guildford Residents Association	It is acknowledged that support for policy 14.	No action arising
	Suggest the policy should read - "planning permission will only be granted where it can be demonstrated that the proposed waste development will not have an unacceptable impact either individually or cumulatively on the following"	New Zealand Golf Course	Policy 14 has been positively worded to be consistent with the NPPF.	No action arising

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	Concern that policies should be more cross linked or referenced to one another	CPRE Surrey and New Zealand Golf Course	It is acknowledged that these comments. Waste development must be acceptable against all the policies in the plan. The Strategic Objectives indicate the interconnectivity between the policies.	No action arising
	Argues that there has not been adequate assessment of air quality and travel impacts	Resident	Transport and air quality assessments are being undertaken to confirm the suitability of the sites proposed for allocation.	Update Annexe 1 with the outcomes of the assessment work.
	Concern that incinerators are highly polluting - many studies suggest that there are adverse health impacts on people living near incinerators	Resident	Modern energy from waste facilities (incinerators) are known to operate without causing adverse health impacts. All proposals for waste management facilities will require Environmental Permits from the Environment Agency which ensures that any emissions do not cause harm to human health or pollution of the environment.	No action arising
	Argues that incineration involves releasing high levels of CO2, which will have a negative impact on climate change	Resident	EfW is preferable to disposal as it is higher in the waste hierarchy. Incineration will only be permitted to manage waste that can't be recycled.	No action arising
	Supports the recognition of the importance of Surrey's historic environment	Historic England	It is acknowledged that support for policy 14.	No action arising
	Comments that no consideration is taken for accountability or traceability to waste arriving at sites. Concern that contaminated waste can be mixed by waste disposers prior to crushing. Concern that with the constraints on budgets monitoring of waste and the effects of waste will not be undertaken or enforced if applicable. Comments that Surrey makes no effort to make the companies that operate these sites conform to what they agree to when the permissions are granted. Comments that insufficient evidence shown that landfill material is scrutinised for illegal materials such as asbestos, plaster board or contaminated material particularly as no responsibility (paper trail) can prove what ever went into any form of crusher etc. was in fact clean to start with.	Residents	It is acknowledged that these comments. Operators require an Environmental Permit from the EA and these place restrictions on the types of waste that can be managed at sites and ensure this is monitored and enforced. The WPA undertakes regular monitoring of sites and responds to reported breaches of permission to ensure planning permissions and conditions are adhered to. Enforcement action will be taken where breaches are identified.	No action arising
	Concern that there is currently many small scale sites that deal with this waste that are allowed to continue in use without proper monitoring by	Resident	It is acknowledged that these concerns. Sites that operate without planning permission will be subject to enforcement action. The council and the EA investigate any reports of potentially unregulated activity.	No action arising

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	authorities or Surrey County Council. HGV operating centres being set up on existing farm sites should be routinely objected to by SCC but are not.			
	Support for (8.9) emphasis on ensuring that opportunities for achieving biodiversity net gains are realised through the development process. Concern for potential light pollution from waste management facilities is adequately covered.	Surrey Nature Partnership	The WPA acknowledge support for policy 14. Para 8.9.9 states: Amenity generally refers to residents' expectations for enjoyment of their surroundings. It can cover a range of issues from noise, dust, odour, and disturbance due to illumination and vibration.	No action arising
	Suggests at 8.9.25, mention might also be made to the relevance of post-mineral restoration to biodiversity conservation.	Surrey Nature Partnership	The WPA acknowledge these comments and will ensure appropriate reference is made to biodiversity gains from post-mineral restoration is included.	Make reference to benefit of minerals restorations on biodiversity.
	Suggests at the end of 8.9.27 the following is inserted: "The determination of applications within the AONB will be in accordance with this Government policy together with the landscape policy within the local local plan and policies within the adopted AONB Management Plan."	Surrey Hills AONB Board	It is recognised that it would be helpful to mention these other material considerations which would be taken into account when assessing the suitability of proposals.	Amend wording as appropriate.
	Suggest at 8.9.26 reference be made to particular AONBs (Surrey Hills & High Weald).	Natural England	It is recognised that it would be helpful to make specific reference to the AONBs in Surrey which do have additional policy protection in the NPPF.	Amend wording as appropriate.
	Suggest at 8.9.31 policy should make clear that any impacts upon European designated sites the application of the Imperative Reasons of Overriding Public Interest (IROPI) test would be required before any compensation could be considered.	Natural England	It is recognised that it would be helpful to make specific reference to the fact that any impacts upon European designated sites the application of the Imperative Reasons of Overriding Public Interest (IROPI) test would be required before any compensation could be considered.	Make changes to text to clarify specific requirements of Habitats Regulations
	Suggest at 8.9.35 that clarity is required to establish which developments would be expected to enhance biodiversity.	Natural England	It is recognised that it would be helpful to give examples of how development could enhance biodiversity	Provide examples of how development could enhance biodiversity in paragraph 8.9.35
	Argue that TDC/SCC have shown in the past that they do not enforce planning consents if they choose to	Resident	The WPA acknowledge these comments. For waste related development the WPA regularly monitor sites and investigate observations of the public and will look to take action where a breach is established.	No action arising
	Question whether barge transportation has been considered and argue that	Residents	The WPA acknowledge these comments. Provision for water transportation is made in policy 15, however, it may not be viable and the wharf infrastructure may not exist.	No action arising

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	not to consider barge transport is a huge omission			
	Concern that proposals are based on subjective ideals and not reality - e.g. waterways for transportation are not viable	Resident	Policy 15 aims to encourage the most sustainable transport methods. Policy 15 recognises this and states; Where practicable and economically viable, the development makes use of rail or water for the transportation of materials to and from the site;	No action arising
	Concern that waste transportation is largely road based with the negative consequence of increased volume of HGV movements	Residents and The Chertsey Society	As with the transport of most other goods and materials, waste transport is largely road based due to locational and financial requirements of rail and water transport. Policy 15 seeks to minimise the effects of HGV movements and ensure surrounding highways have adequate capacity. A Transport Assessment is being undertaken to understand the likely impact of different types and scales of waste development at each of the allocated sites.	Update Annexe 1 with the outcomes of the TA.
Policy 15 – Transport and Connectivity	Aims of this policy are good/supported	Resident	The WPA acknowledge support for policy 15.	No action arising
	Concern over how much road transportation will be needed and how helpful existing rail network coverage will be	Resident and Oxsted and Limpstead Residents Group	The WPA acknowledge that, like other goods and materials, waste transportation is generally by road. Transport assessments are being undertaken to gauge an acceptable level of vehicle movements at sites. The existing rail network will help achieve sustainable transport where possible.	As appropriate, update Annex 1 to specify how access to sites should be achieved.
	Concern that no reassurance has been given to local people that the potential impact on traffic and transport infrastructure will be minimised and mitigated where possible	Bisley Parish Council	Policy 15 seeks to minimise impacts of waste development where possible, all proposals will have to conform to this policy. The plan states: "In order to mitigate impacts related to transport Traffic Management plans would generally be required at the planning application stage. Applications for waste development will often require a Transport Assessment to support them. Traffic Management plans and Transport Assessments will be considered by the Highway Authority, who will make recommendations as appropriate" (8.10.3). The WPA is undertaking both a transport and air quality assessment to inform the next stage of the plan.	As appropriate, update Annex 1 to specify how access to sites should be achieved.
	Concern over increased pollution when existing pollution is bad enough	Residents and Oxsted and Limpstead Residents Group	The WPA is undertaking both a transport and air quality assessment to inform the next stage of the plan. This will establish the scale and use of acceptable facilities at proposed sites to ensure there are no unacceptable impacts caused by pollution.	As appropriate, update Annex 1 to specify how access to sites should be achieved.
	Concern that there must be adequate capacity on the Lorry Route Network	CPRE Surrey	Policy 15 requires development to ensure it does not have an unacceptable impact on the highway network. A transport assessment is being undertaken to assess the suitability of accessing sites by road that will consider the capacity of the Lorry Route Network .	As appropriate, update Annex 1 to specify how access to sites should be achieved.
	Argue that there should be an additional requirement that there is no adverse impact on local communities because of the increased flow of HGVs	CPRE Surrey	Policy 15 requires developments not to impact the safety of the highway network which serves local communities. Policy 14 'amenity' covers other traffic related impacts like noise and pollution.	No action arising
	Argue that the policy should be reworded to read "Proposals for waste facilities will need to demonstrate that"	New Zealand Golf Club	Policy 15 has been positively worded to ensure consistency with the NPPF.	No action arising
	Concern that the road classification of	Grundon Waste	The WPA acknowledge these comments and will clarify this.	Clarify 'local road' and/or

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	"local road" is not clear enough - not sure what is meant by this	Management		revise wording.
	Concern that the plan states there is a need to address impacts on roads, but this is not being undertaken in detail at this stage - Dealing with this matter at the application stage is far too late, particularly if a problem is revealed in the detailed assessment	Residents	The WPA is undertaking a transport assessment for all sites to inform the next stage of the plan. This will identify what type and scale of development, in transport terms, is suitable at each site.	Update Annexe 1 with the outcomes of the TA.
	Point iv) should be reworded to say - "a site will not be allocated if adequate access and safety cannot be met"	Resident	Policy 15 will be used by the WPA at an application stage not to assess whether sites are allocated. Proposed allocations are being subject to a detailed transport assessment and will not be allocated if it cannot be shown that in principle the site cannot be accessed adequately and safely.	As appropriate, update Annex 1 to specify how access to sites should be achieved in light of transport assessment.
	Concern that the policy is non-descriptive in terms of the requirements for a transport assessment accompanying an application - if there is a certain threshold to which a Transport Assessment is required, then this should be included within the policy	Runnymede Borough Council	The WPA acknowledge these comments. It is not considered possible to implement a specific threshold for applications to require a transport assessment. This is because the scale of a development must be considered with other factors like existing highway capacity or suitability of roads.	Consider providing clarification as to when a TA would be required.
	It will be impossible for SCC to put in place effective control of the substantial increase in lorry movements if consent is given	Resident	The WPA have the power to enforce against breaches of planning permission/conditions and will do so when identified. Regular monitoring is undertaken to monitor compliance.	No action arising
	Shows support for Policy 15 - the policy will result in fewer vehicle movements on the county's already constrained highways network - aligns with the NPPF	WT Lambs Holding Ltd and Guildford Resident Association	It is acknowledged that support for policy 15.	No action arising
	Suggests caution with wording to ensure promotion of co-location does not encourage, in inappropriate locations, the addition of high impact facilities alongside more modest waste facilities	Guildford Residents Association	It is acknowledged that these comments and would reassure the respondent the an application for co-location would be encouraged if it results in fewer vehicle movements but will still be subject to all other policies in the plan to ensure there isn't inappropriate development.	No action arising
	Policy should include the words "on site", for the current provision would allow turning, parking and manoeuvring on the kerb side of dual carriageways as it is so weak	Resident	Agree.	Amend clause v) as follows: "Satisfactory on site provision is made for vehicle turning and parking, manoeuvring, loading, and, where appropriate, wheel cleaning facilities."
	Supports the idea of using sustainable	Tandridge District	It is acknowledged that support for policy 15.	No action arising

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	transport using rail or water	Council		
	Argues that Policy 15 lacks sufficient commitment to the use of sustainable transport	Tandridge District Council	The WPA acknowledge these comments. Policy 15 encourages the most sustainable methods where possible (rail & water) but recognises that this may not be practical and/or viable and so in such cases applies requirements to limit impacts on roads.	No action arising
	Concern that opinions of residents over past planning applications are being ignored again	Resident	The proposed allocation of sites has resulted from a completely new site identification and evaluation exercise. All comments on these sites are being considered by the WPA before a final decision is made. Residents will also have an opportunity to make representations to the planning Inspector who will examine the plan.	No action arising
	Supports SCCs professional judgement	Resident	This support is acknowledged.	No action arising
	Concern that community engagement should happen earlier in the process	Resident	With regards to Policy 16, the policy encourages developers to engage with the local community before an application is submitted. The WPA consider this the earliest stage possible.	No action arising
	Concern that the consultation was not published widely enough - only found out about the consultation by chance. The documents were too complicated and unintelligible and require knowledge of planning issues. There should be a wider, more transparent consultation.	Residents	The WPA acknowledge these concerns. The WPA followed best practice guidance on conducting the consultation and every effort was made to reach as many residents as possible especially those living close to the proposed sites. The WPA are required to make all consultation documents public. Documents will be read by industry, interest groups, other councils as well as residents. This requires some complexity to documents. A Non-Technical Summary (NTS) was produced to enable residents to have a sufficient knowledge of the plan to comment while not being overly complex. The WPA followed best practice guidance on conducting the consultation to reach as many people as possible.	The consultation process will be reviewed prior to the next stage of consultation, and will incorporate any feedback made.
	Concern that in the case of site 8, there are only a few local residents, and as a result, even if all of them complained, this would only be a small volume of complaints	Resident	The WPA is concerned with the merits of the comments being made about the suitability of sites and not the number of responses.	No action arising
	Concern that the documents are too complicated and are overwhelming. Argues that they are virtually unintelligible to the average person as they require knowledge of planning issues	Residents	The WPA are required to make all consultation documents public. Documents will be read by industry, interest groups, other councils as well as residents. The documents must also be consistent with planning law and national and government policy. This requires some complexity to documents. A Non-Technical Summary (NTS) was produced to enable residents to have a sufficient knowledge of the plan to comment while not being overly complex. The WPA followed best practice guidance on conducting the consultation and every effort was made to reach as many residents as possible.	The inclusion of Executive Summaries and Non-Technical Summary documents will be considered at the next stage of the plan making process.
	Concern that this policy does not seem to appear to require that the views of those people are taken into account	Resident and CPRE Surrey	There is national policy and guidance on how the WPA should take representations into account. Policy 16 encourages applicants to engage with communities.	Add text to make clear that comments are taken into account by the WPA before planning permission is granted.
	Argues that community involvement and participation is to be encouraged - especially by those who live near to	Resident	The WPA agree, policy 16 encourages community engagement by applicants. This would encompass those living near where waste is managed. The Council has sought to engage with communities through each consultation that has been carried out.	No action arising

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	where waste is being managed			
	Concerned that there is a risk that houses in the surrounding area will be severely devalued	Resident	The WPA acknowledge these concerns. However the impact on house values is not a material planning consideration that needs to be taken into account by planning authorities either at plan making stage or planning application stage. Policy 14, however, seeks to ensure that planning permission will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment, which includes general amenity.	No action arising
	Concern that there is inadequate respect awarded to the greenbelt	Resident	The WPA acknowledge these comments. Protection of the Green Belt is provided for by policies 9 and 10.	No action arising
	Argues that the policy should be reworded to read: "Proposals for waste development will need to demonstrate that the applicant has..."	New Zealand Golf Club	Policy 16 has been positively worded to be consistent with the NPPF.	No action arising
	Concern that Policy 16 requires community engagement and the implication is that applications would be refused without this - There is no requirement to undertake this, it is merely good practice - It would be unlawful to refuse on what is an unsound planning reason	Grundon Waste Management	The Council note this comment.	The Council will review the wording of this policy.
	Concern that consultation with the public is a tick box exercise	Residents	The WPA will consider all responses to develop the plan and take into account views of residents, operators, interest groups and other local authorities. The WPA view consultation and the views of other as essential to developing the plan.	
	Questions whether a stand alone policy is needed or if this matter would be better picked up through guidance or picked up as part of policy 14?	Runnymede Borough Council	The WPA don't believe that policy on community engagement is a 'development management' criteria as it is not concerned with controlling the impacts of a facility.	
	Generally welcomes the approach, but, suggest adding to Policy 16 "and demonstrated how they have taken community feedback into account"	Guildford Residents Association	Agree it is important for applicants to show how comments have been taken into account.	Amend text as appropriate

Appendix 9 – Comments on Site Identification and Evaluation

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
Site ID and Evaluation Process	General support for the Site Identification and Evaluation process, it seems fair and reasonable.	Residents	Acknowledgement of support.	No actions arising.
	It is a shame more industrial sites could not be put forward.	Resident	Industrial sites were excluded from further consideration in the Site Identification and Evaluation document based on comments from operators through the Issues and Options Consultation (September 2016). The minimal capacity that has been delivered on land use for industrial purpose in Surrey previously and the regular turn-over in occupation of individual units and sites within industrial estates makes their allocation within the emerging SWLP impracticable. This issue was specifically considered in the background paper "Delivery of Waste Management Capacity in Surrey 2008 – 2017". However it is acknowledged that industrial estates may offer suitable opportunities for the development of waste facilities in Policy 11 of the SWLP.	A list of industrial estates that might offer opportunities for waste management development will be added to the plan, following targeted consultation with Districts and Boroughs.
	Concerns that the report does not take into account the Green Belt, proposed sites located within the Green Belt is inappropriate.	Residents	Surrey County Council recognises this concern in relation to Green Belt. The site selection process did take account of the Green Belt but few suitable, deliverable sites not located in the Green Belt were identified - this is set out in the "Site Identification and Evaluation Report". National policy requires development in the Green Belt to meet stringent tests. Although most of the proposed allocated sites are located within the Green Belt, it is recognised that any application for development on the Green Belt must demonstrate "very special circumstances" and should comply with Policy 9 "Green Belt" in the plan as well as the NPPF.	The Spatial Strategy will be strengthened to make it clear that development in the Green Belt should only take place in very special circumstances and that other suitable alternative on Green Belt sites would be preferred.
	Concerns that the report does not take into account the impacts the proposals will have on traffic.	Residents	The Site Identification and Evaluation report, and the Annex of shortlisted sites, considers potential transport impacts and accessibility in evaluating potential sites. Policy 15 seeks to ensure that vehicle movements associated with the development are minimised and will not have an unacceptable impact on the capacity of the highway network. Surrey County Council is assessing the impacts of potential development at the proposed allocated sites on the transport network. A detailed Transport Assessment will be carried out, highlighting any areas of concern which can then be addressed/mitigated against.	Update Annex 1 to reflect findings of the transport assessment.
	Concerns that the report does not take into account how local communities/residents will be affected by the proposals.	Residents	The Site Identification and Evaluation report considers proximity to sensitive receptors. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fume, odour, vibrations, illuminations etc.	Annex 1 will be updated to mention site specific matters concerning impacts on communities which need to be addressed at the planning

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
				application stage.
	Concerns that the report does not take into account schools.	Residents	This comment is acknowledged and accepts the importance of considering the safety around schools in relation to the increased vehicle movements (HGVs). The Site Identification and Evaluation report considers proximity to sensitive receptors which includes schools.	No actions arising.
	Concerns that the report shows no consideration for flooding.	Resident	Surrey County Council acknowledges this concern. Policy 14 states that planning permission for waste development will be granted if it can be demonstrated that there will not be an unacceptable impact on communities and the environment, specifically in relation to flood risks. The Site Identification and Evaluation report considers flood risk. Separate detailed flood risk assessment is being undertaken to confirm the impact that sites proposed for allocation in the plan will have on flood risk.	Annex 1 will be updated to mention site specific matters concerning impacts on flood risk which need to be addressed at the planning application stage.
	Slyfield Area Regeneration Programme (SARP) has been earmarked but still have concerns regarding the increased sewage and the amount of pumping required from new developments.	Resident	Surrey County Council notes this concern and notes that the water company responsible for the SARP area will have been consulted as part of the local planning process.	No actions arising.
	It was suggested in areas of former landfill where it is unknown what lies beneath the surface, more than a 'desktop' exercise and a walk around are needed to establish what may lie underneath.	Resident	Annex 1 specifically identifies the existence of former landfills (where relevant). Any planning application for development in such locations would have to be accompanied by a site investigation report to confirm that no unacceptable impacts would arise from development on areas of former landfill.	Update Annex 1 to include mention of need for site investigation report where relevant.
	Stated that the report is unsuitable (No detail provided).	Resident	The report is a robust assessment of the availability of potential sites for development of waste management capacity in Surrey and has been in accordance with national planning policy and guidance.	No actions arising.
	Acknowledgement that some efforts have been made to avoid obvious pollution of public thoroughfares.	Resident	Surrey County Council notes this comment. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities or the environment.	No actions arising.
	The report needs to consider pollution, especially from dirty emissions.	Residents	The Site Identification and Evaluation report includes consideration of proximity to sensitive receptors and potential effects of noise and air emissions. Policy 14 seeks to ensure that there not be an unacceptable impact on communities or the environment in relation to air quality, noise, dust, fumes, illuminations etc.	Annex 1 will be updated to mention site specific matters concerning impacts on communities which need to be addressed at the planning application stage.
	The report needs to consider the level of noise that will be created.	Resident	The Site Identification and Evaluation report includes consideration of proximity to sensitive receptors and potential effects of noise. Policy 14 seeks to ensure that there not be an unacceptable impact on communities or the environment in relation to noise.	Annex 1 will be updated to mention site specific matters concerning impacts on communities which need to be addressed at the planning

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
				application stage.
	The report does not mention Horsell Common or the impacts this development would have on the area.	Resident	Any proposals for waste management development near to Horsell Common would not be permitted unless it was demonstrated that such development would not have an unacceptable impact on this SSSI.	Annex 1 will be updated to include mention of the need to protect Horsell Common
	Stated that the report seems comprehensive.	Resident	Acknowledgement of support.	No actions arising.
	Stated that the information is vague, overcomplicated and insufficient. Stated that the site identification and evaluation exercise is misleading. General opposition to the length of the report, it is indigestible, difficult to understand and time consuming to read. Consider devising a summary with links to the more detailed report.	Residents, CPRE Surrey, Grundons Waste Management	This comment is acknowledged. The document has been prepared in accordance with national planning policy and guidance and is considered a robust assessment of the availability of potential sites for development of waste management capacity in Surrey. The plan needs to comply with legislation, national policy and guidance and sufficient evidence is required to support the policies and site allocations, and so the documentation is necessarily long and can be complex.	Develop and publish a non-technical summary document for the Site Identification and Evaluation Report, this will summarise in more simple terms the current document and will shorten the length.
	It was noted that the aim is not targeting sustainability but more of a cost cutting exercise.	Resident	The plan is to provide for necessary waste management capacity in a sustainable manner and will take into account recommendations from the Sustainability Appraisal.	No actions arising.
	The report states that there are no air quality issues in Tandridge, a respondent believes this is incorrect as Godstone Parish has undertaken work with negative results.	Resident	This comment is acknowledged. Annex 1 identifies that there are no AQMAs in Tandridge which is factually correct. TDC annual report identifies AQ issues generally https://www.tandridge.gov.uk/Portals/0/Documents/Business-and-Licensing/Environmental/Tandridge-ASR-2017-final-Tandridge-version.pdf . Air Quality Impact Assessment is being undertaken to assess the impact on air quality of development at site proposed for allocation.	Update Annex 1 to confirm the type and scale of development that could be accommodated at each of the sites proposed for allocation taking account of the results of the AQIA.
	It is noted that any site should be situated away from residential areas and put closer to built up areas with wider roads and good transport links.	Residents	Surrey County Council acknowledges this suggestion. These matters have been taken into account in the site evaluation process.	No actions arising.
	Stated that some proposed sites are better suited than others.	Resident	This comment is acknowledged.	No actions arising.
	Stated that the site near Heathrow (Oakleaf Farm) is less unacceptable than others.	Resident	Surrey County Council note this comment. The process identifies sites that are potentially most suitable in principle. Further assessment is underway to confirm the type and scale of development that could be accommodated at each of the sites proposed for allocation.	Update Annex 1 to confirm the type and scale of development that could be accommodated at each of the sites proposed for allocation.
	It was noted that sites need to be allocated within the Green Belt as there is no other suitable non-Green Belt land available.	Grunion Waste Management	This comment is acknowledged. Although allocated sites may be located within the Green Belt, it is recognised that any application for development on the Green Belt must demonstrate "very special circumstances" and should comply with Policy 9 "Green Belt" in the plan as well as the NPPF.	No actions arising.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	The County Council is allocating sites within the Green Belt as there are no other non-Green Belt sites available. The failure of Policy 9 to reflect this is a barrier to delivery and seems to run counter to Policy 10.	Grundon Waste Management	This comment is acknowledged. The policies need to be considered together and the plan as a whole. The County Council is also seeking to ensure that the plan is consistent with national and government policy with regards to Green Belt.	No actions arising.
	It is not clear whether the Site Identification and Evaluation report reflects the entire site GU23 (Land to the north east of Slyfield Industrial Estate), Guildford. May need to check the discussion on site suitability and application of sieves for consistency with the attributes of the site.	Guildford Borough Council	The Site Identification and Evaluation report will be reviewed and updated as necessary to clarify the position.	Review the discussion on site suitability and application of sieves for consistency with the attributes of site GU23 (Land to the north east of Slyfield Industrial Estate)
	Further clarification needed with regard to the Former Wisley airfield site (GU31) as it is reflected in the GB SLP (ref. Policy A35).	Guildford Borough Council	Surrey County Council acknowledges this request for further clarification.	Provide further clarification with regard to GU31 as it is reflected in the Guildford Borough SLP (ref. Policy A35).
	Consider comparing the quality of life of residents at each proposed site.	Resident	Policy 14 seeks to ensure that there will not be an unacceptable impact of the quality of life of communities including air quality, noise, dust, fumes, odour, vibration, illumination etc. The Site Identification and Evaluation considers potential effects on proximate sensitive receptors in a consistent way. Impact on residents is one consideration.	Annex 1 will be updated to mention site specific matters concerning impacts on communities which need to be addressed at the planning application stage.
	How will the Council monitor and measure the impacts on the residents?	Resident	This comment is acknowledged. Policy 14 seeks to ensure that there will not be an unacceptable impact on residents including air quality, noise, dust, fumes, odour, vibration, illumination etc. The Council has a dedicated enforcement team that monitors sites to ensure compliance with conditions. Reports of noncompliance with conditions will be investigated and enforcement action will be taken as necessary.	No action arising.
	Explain how each sites complies with the NPPF and Policy 9 (Green Belt).	Resident	Surrey County Council acknowledges this request for explanation. The Evaluation process considers factors that determine suitability reflecting NPPF and NPPW.	No actions arising.
	The report evaluation of Land at & adjoining Leatherhead STW does not give any justified beneficial reasons as to why it is being considered.	Resident	This comment is acknowledged. The Site Identification and Evaluation report identifies that there are no reasons to exclude the site, based on the assessment/sieving against a range of factors.	No action arising.
	Consider further assessments of the air quality.	Resident	Acknowledgement of this suggestion. Air quality assessments will be required should sites come forward for development as required by Policy 14.	Update Annex 1 to take account of findings of Air Quality Impact Assessment.
	Highways assessment needs to be carried out.	Resident	Surrey County Council acknowledges this suggestion for highway assessments to be carried out. Transport assessment is being undertaken to enable Surrey County Council to understand in more	Update Annex 1 to take account of findings of transport assessment and confirm the

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
			detail the potential impacts upon the local road network of development on sites proposed for allocations. This will inform the contents of Annex 1. The Transport Assessment will enable the county council to get a better understanding of the likely impacts to the surrounding transport network, this will allow Surrey County Council to identify issues, and attempt to resolve/mitigate them. Policy 15 seeks that vehicle movements will be minimised, will not have unacceptable impacts on the capacity of the highway network and there is a safe and adequate means of access to the highway network and a Transport Assessment will need to accompany any applications to comply with this policy and Policy 14. Also, waste will be able to be transported with minimal use of local roads and vehicle movements will not have an adverse impact on the safety of the highway network.	accessibility of the site by road.
	Para 4.2.13 the site plan should reflect the plan provided in Appendix 1 of these representations. The site area should be increased to 8 ha. The evidence base document should also acknowledge that the railway siding is privately owned and therefore permission from Network Rail will not be required to operate it. Para 4.2.28 The site area should be altered to 8 ha. Paragraph referred to is incorrect and should be 4.2.13. Similarly, Table 6 should be altered to reflect the true site area for Lambs Business Park.	W T Lambs Holdings Ltd	Acknowledgement of this suggestion. The site will be re-evaluated based on the new site area proposed by the promoter.	Amend site plan and reference to Network Rail. Reassess site based on new plan.
	Stated that low level radioactive waste next to residential areas is unacceptable.	Resident	This comment is acknowledged. Policy 14 seeks to ensure that there will be no unacceptable impact on communities arising from the management of waste.	No action arising.
	3.3.9 Guildford does not have any AQMA's yet it is known that air quality exceeds international limits along the A3.	Resident	Surrey County Council notes this comment. Transport and air quality impact assessment is being undertaken that will consider the implications of any waste related development at each of the sites.	Update Annex 1 to reflect the findings of assessment so the sites proposed for allocation in the plan including recommendations regarding vehicle movements.
	3.5.4 Site allocation 'Green Belt', 'countryside beyond Green Belt' and 'outside countryside beyond the Green Belt' - there is nothing else outside countryside beyond the Green Belt... save urban and suburban town. This sieve is leaking and needs re-	Resident	Acknowledge of this suggestion. Land 'outside countryside beyond the green belt' is intended to represent largely urban areas.	Definitions to be clarified.

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	defining.			
	3.5.15 The distance of 20 metres is extremely close.	Resident	This comment is acknowledged. Guidance by IAQM is cited that is reflected in this criteria, providing a consistent means of assessing sensitivity.	No action arising
	4.2.17 Slyfield site has been assessed but results have been hidden - still generating methane and is a fire hazard. This is not recognised in the current waste management plan. 5.1.4 A full on site investigation need to be honestly completed and displayed prior to the inclusion of site GU23.	Resident	This comment is acknowledged. Any proposals for development of this site would need to take the existence of old landfill (this specifically is mentioned in Annex 1) into account and ensure that this did not result in unacceptable impacts - Policy 14 would apply in particular. The Site Identification and Evaluation report applies criteria to assess acceptability and suitability in principle. Full site investigations will be required should sites come forward for development.	No actions arising.
	Appendix 1 site ref GU23/GU22 should be excluded.	Resident	Surrey County Council acknowledges this suggestion. GU22 has not been selected. GU23 was selected following a robust site identification and evaluation exercise that was undertaken in accordance with national policy and guidance.	No action arising
	Appendix 2 site ref GU23 is an incorrect designation as it is not Green Field, it is in fact 'disused waste dump' sitting in Zone 3b floodplain with failing clay bunds adjoin river.	Resident	This comment is acknowledged. Parts of the site are greenfield while others are restored landfill (Annexe 1 page 11) which would be considered as PDL.	Amend Annexe 1 to reference to greenfield (including restored landfill).
	Appendix 3 Table A3-1 appears to be mistitled as the low figures are higher than the high figures, the table makes no rational sense.	Resident	Surrey County Council has checked this table and notes that the C&D Recycling figures for Low and High recycling scenarios should be swapped.	Revise figures in Table A3-1 .
	General support for tables' A3-2/3/4, they make complete sense and are understandable and logical.	Resident	Surrey County Council recognises the support for Tables' A3-2/3/4.	No actions arising.
	The report underestimates the risk associated with bringing Martyrs Lane site forward as a potential allocation. It should be eliminated from consideration.	New Zealand Golf Club	This comment is acknowledged. The site was selected following a robust site identification and evaluation exercise that was undertaken in accordance with national policy and guidance.	No actions arising.
	The significance of the impact of development upon the Thames Basin Heaths SPA should be fully assessed at the strategic stage as we do not consider that adequate mitigation can be advanced to outweigh any harm that may result.	New Zealand Golf Club	This comment is acknowledged. HRA is being undertaken that will consider the impact on the Thames Basin Heaths SPA. Potential impacts on TBH from waste use and transport are being assessed.	Update Annex 1 to reflect the outcomes of the HRA.
	Stated that Martyrs Lane should not have progressed to stage 2 as it should have been ruled out following the Preliminary Sieving stage under Sieve E.	New Zealand Golf Club	This comment is acknowledged. Appendix 2 defines this as 'greenfield' but is reported as being restored landfill, and so is consistent with NPPF. Clarification will be added that restored landfill is different to restored mineral workings that are excluded from consideration.	Add clarification to report

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	The report fails to recognise constraints that exist in terms of access to the strategic highways network.	New Zealand Golf Club	This comment is acknowledged. Accessibility is considered in Annexe 1 and further transport assessment is underway to establish specific issues related to vehicle movements. Policy 15 seeks that vehicle movements will be minimised, will not have unacceptable impacts on the capacity of the highway network and there is a safe and adequate means of access to the highway network. Also, waste will be able to be transported with minimal use of local roads and vehicle movements will not have an adverse impact on the safety of the highway network.	Update Annex 1 to reflect the findings of assessment so the sites proposed for allocation in the plan including recommendations regarding vehicle movements.
	Annexe A fails to acknowledge that HGV movements through the junction of Martyrs Lane/Woodham Lane is restricted and that all movements must access and exit via the McLaren Roundabout on the Guildford Road. The accessibility to the strategic road network has therefore been over estimated.	New Zealand Golf Club	Noted. Annexe 1 considers transport and accessibility and a Transport Assessment would be required to accompany any application. Transport assessment is also being undertaken to enable Surrey County Council to understand in more detail the potential impacts upon the local road network of development on sites proposed for allocations. This will inform the contents of Annex 1. The Transport Assessment will enable the county council to get a better understanding of the likely impacts to the surrounding transport network, this will allow Surrey County Council to identify issues, and attempt to resolve/mitigate them.	Update Annex 1 to reflect the findings of assessment so the sites proposed for allocation in the plan including recommendations regarding vehicle movements.
	<p>Copyhold Works (Site RE16): The Borough Council appreciates the clarification in the plan that the Copyhold site is not required for waste related purposes. This site has been identified in the Development Management Plan Regulation 19 document as a housing allocation. Reigate & Banstead Borough Council confirm that ongoing engagement has taken place between Surrey County Council and the Borough Council on this. However, concerns remain for further consideration in relation to the adjacent Patteson Court development, which remains an active and regulated site and relevant to the Waste Local plan implementation as contributing to dealing with waste arisings during the new plan period.</p> <p>Patteson Court (Site RE18) is a landfill site with full consents and restoration regime. This has been subject of ongoing discussion between the Borough and County Council</p>	Reigate and Banstead Borough Council	Surrey County Councils acknowledges these comments. Discussion with Reigate and Banstead Borough Council on this matter are ongoing. Paragraph 8.5.1 notes that disposal of waste is "the least preferred option for waste management in the waste hierarchy, however it is an option Surrey County Council still need to plan for. There is a long history of non- inert landfill in Surrey at Patteson Court and this site has planning permission until 2030."	Continue discussions with Reigate and Banstead Borough Council and Biffa.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	<p>and the operator. The latter has expressed concerns about the potential development of residential properties adjacent to the current landfill site. This is likely to be a matter which is considered at the forthcoming DMP Examination. The Borough Council reserves its position to raise matters in relation to the emerging Waste Local plan policies depending on the outcome of the examination and where an existing and consented waste site is subject to proposals to vary or extend the life of a consent condition and/or agreed restoration programme.</p>			
	<p>The site is in the Green Belt, as are seven out of the nine shortlisted sites in the plan and as were most of the identified sites in Policy WD2 of the 2008 plan. It has thus been accepted that the location of a site in the Green Belt is not an over-riding constraint for waste management development. However, the approach of the Council in this plan is to exclude from consideration 'Former Operational Mineral Working and Land Allocated for Mineral Working' - Sieve E in Background Policy Paper 6. This blanket approach does not allow for any differentiation between a long-term sand pit such as Homefield where restoration takes many years because of the sheer scale of the working and a sand and gravel extraction of the found in North-West Surrey where progressive restoration is a key element of the whole operation, with restoration following closely behind extraction. Homefield is going to be operational for the whole of the plan period to 2033 and beyond and is not subject to a staged restoration scheme with time constraints.</p>	Chambers Runfold Plc	<p>This comment is acknowledged. Mineral extraction is seen as an essentially temporary activity and communities have an expectation that once worked the sites will be restored rather than used for waste management. The temporary nature of mineral extraction development is an important factor when applications for mineral extraction are considered in the first place.</p>	No actions arising.
	Having regard to the original list of 20 sites	Spelthorne Borough Council	This comment is acknowledged.	No actions arising.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	in Spelthorne all but one of which have been discounted, it is not considered that there are any other sites which the Borough Council could identify as being suitable for inclusion in the plan.			
	Oakleaf Farm identification for waste development is consistent with its current use.	Spelthorne Borough Council	Acknowledgement of support.	No actions arising.
	Oakleaf Farm - there are a number of matters of fact and details on which the Borough Council seeks clarification having regard to the possible extent of future uses and activities which might be proposed on site.	Spelthorne Borough Council	This comment is acknowledged in relation to Oakleaf Farm.	Provide further clarification in regards to the possible extent of future uses and activities at Oakleaf Farm. If needed, meet with Spelthorne Borough Council to discuss this point in further detail.
	Oakleaf Farm - The site areas proposed in the plan excludes the site of the MRF building which was erected on the site a few years ago as part of the overall planning permission for the permanent waste use of the site. This permission also required the construction of an earth bund around the whole area to provide a visual and sound barrier. The site description and criteria make no reference to this although it would be reasonable to expect any additional waste facilities to be provided within the bunded area.	Spelthorne Borough Council	This comment is acknowledged.	Update Annex 1 to reflect this information.
	Oakleaf Farm - The whole site is immediately to the north of King George VI Reservoir which forms part of the South West London Waterbodies Special Protection Area for birds. This is not referred to in the biodiversity section of the key development requirement but would be an important factor in the assessment of any proposal.	Spelthorne Borough Council	This comment is acknowledged and note that the Habitats Regulations Assessment will consider impact of any waste related development on SPAs.	Review the biodiversity section for Oakleaf Farm. Update/make changes if necessary. Update Annex 1 with the outcomes of the HRA.
	The key development requirement for Green Belt makes reference to Spelthorne proposing to undertake a Green Belt Assessment as part of the preparation of its	Spelthorne Borough Council	This comment is acknowledged.	Look at the Green Belt Assessment in detail on Spelthorne's website.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	new local plan. This work has now been completed and the Borough Council can confirm that Local Area 2a in which this site is located was assessed as performing moderately against the purposes of the Green Belt. Further detail on the Green Belt Assessment may be found on the Council's website.			
	TA10 Lambs Brickworks - The site sieve 2 states that "The site is located at a sufficient distance from designated SPAs and SACs for its use for some form of energy recovery to be feasible." This matter which needs to be considered through HRA screening, which should also factor in the volume of HGV movements throughout the area associated with waste uses.	Tandridge District Council	This comment is acknowledged. HRA is being undertaken that will consider the impact on the SPAs and SACs.	Update Annex 1 to reflect the outcomes of the HRA.

Appendix 10 – Comments on Duty to Cooperate

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
Duty to Cooperate and update statement	Stated that the successful campaign of Walton residents against the development at Weylands 2015/16 was ignored by Surrey County Council.	Resident	This comment is acknowledged. Site was assessed using consistent methodology as set out in Site Identification report and annex. This process is consistent with national policy and guidance. Comments about the site will be taken into account.	Update Annex 1 to include any further mention of specific matters that will need to be addressed at the planning application stage in light of consultation comments and outcomes of further assessment.
	Concerns that there has been no cooperation with local communities or the public.	Residents	There has been considerable consultation and engagement with local communities. It is the Council's priority to ensure local communities and members of the public are kept informed and are fully engaged throughout the preparation of the plan. The LPA are required to produce a Statement of Community Involvement (SCI) and plans are produced in accordance with it. The Regulation 18 Consultation sought to engage with a number of stakeholders. Details of these are set out in Appendix 1.	No arising actions.
	Stated that the list of organisations that the Waste Authority deal with should be enlarged.	Resident	Acknowledgement of this comment. Surrey County Council has a list of organisations that is contacted throughout the preparation of the plan. Organisations which must be consulted in undertaking DtC are prescribed. However, suggestion if there are any organisations missing that you feel should be on the list, please let Surrey County Council know to be able to update the list.	Add other relevant organisations to consultee database.
	DtC statement needs to happen.	Resident	This comment is acknowledged and can reassure the respondent that the Duty to Cooperate Statement will be prepared to evidence its compliance with Section 33A of the planning and Compulsory Purchase Act 2004 (amended) that places a duty on Local planning Authorities "to engage constructively, actively and on an ongoing basis" with prescribed and other relevant organisations to maximise the effectiveness with which plan preparation is undertaken.	Ensure the Duty to Cooperate Statement is effective and up to date throughout the preparation of the plan.
	All parties, including Parish Council's, resident associations and the public should be kept involved and discussions must be held.	Residents	Parish Councils, resident associations and the public have been kept involved in accordance with the Council's SCI. On Surrey County Council's consultation questionnaire it gave respondents the option to whether they wish to be kept informed on the progression of the plan. Those who selected yes, will be sent updates on the progression.	Send updates on the stages of the plan to those who wished to be kept informed according to the consultation.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	Concerns that the consultation was not publicly advertised effectively as a number of respondents claimed they had not heard about the SWLP.	Residents, CPRE Surrey	The county council made a significant efforts to publicise the consultation and received a large number of comments but will make improvements around advertisement for future consultations and keep the webpages up to date on the progression of the plan.	For future consultations, look into additional ways to publicise and advertise the consultation and the progression of the plan to residents and organisations.
	Some respondents feel Surrey County Council should be obliged to contact every household/resident in Surrey with a proposal of this type in a pro-active way. More attention and consideration should be given to the communities and residents views who will be affected and Surrey County Council must listen to all feedback received.	Residents and Wonham Place RTM Limited	Surrey County Council can confirm that all feedback received will be considered and listened to throughout the preparation of the plan and will be documented and made available as part of the plan-making process. The preparation of this document forms an important part of this process. The County Council identified and notified all residents living within a certain distance of sites proposed for allocation. The Council also contacted community organisations such as parish councils and resident associations. Policy 14 seeks to ensure that there will not be an unacceptable impact on communities including air quality, noise, dust, fumes, odour, vibration, illumination etc.	Continue to take into account and document all feedback received and carry out any necessary actions/changes that may be required.
	Stated that the report seems sound.	Resident	Acknowledgement of support.	No actions arising.
	Some respondents are not convinced that DtC has ever taken place or ever will, it is not usually adhered to.	Residents	Surrey County Council can reassure respondents that Duty to Cooperate has taken place and will continue to take place throughout the preparation of the SWLP. See the DtC Scoping Statement which will be updated regularly to show an ongoing record of engagement that has been undertaken. DtC is a legal requirement and must be demonstrated and tested in the preparation of the plan. Organisations which must be consulted in undertaking DtC are prescribed and this does not include residents.	Keep the Duty to Cooperate Scoping Statement updated with new issues that arise or different bodies that need to be involved in discussions.
	It was stated that several environmental bodies were unaware of its existence.	CPRE Surrey	Table 10 includes the environmental bodies Surrey County Council made aware of the consultation. This list is reviewed for each consultation to ensure that as many relevant bodies are contacted as can be considered reasonable.	Review list of environmental bodies Surrey County Council contact during consultations.
	The statement does not "set out who the council expects to engage with."	Claygate Parish Council	This comment is acknowledged. The Duty to Cooperate Appendix 1, Tables 9 And 10 list the adjoining authorities and other bodies we carry out cooperation with under Duty to Cooperate. Appendix 1 of this document lists the authorities and bodies that we have engaged with so far.	No action arising
	The statement does not outline whether Parish Council's should be consulted.	Claygate Parish Council	There is no requirement to engage with Parish Councils under the DtC, however all Parish Councils were made aware of the consultation and invited to comment.	No action arising
	It was stated that the questionnaire was not an effective way of engaging as it was too complicated. To improve it needed fewer but more general questions.	Claygate Parish Council, Residents	The questionnaire is set out in a deliberate way to encourage comments to be made within specific themes, relating to specific parts of the plan. Guidance on how to complete the questionnaire was provided and the format of the questionnaire has allowed easier analysis of comments	For the next consultation, revise the questions used. Consider adding more general questions, for example an "Other comments" option to

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
			made. It is acknowledged that there is always scope for improvement and feedback on the process will be considered for the next consultation.	avoid respondents putting comments into a random box on the survey.
	The Council has embarked upon the preparation of its Site Allocations DPD to identify specific sites to meet future development needs. A draft DPD has been published for Regulation 18 consultation, and the Council is analysing the representations to inform the Publication version of the DPD which will be published for Regulation 19 consultation in due course. As part of this process, the Council is exploring the possibility of safeguarding the land east of Martyrs Lane to meet future development needs between 2027 and 2040. The Council consulted on this specific proposal between January and March 2017, and the County Council was directly consulted. Under the duty to cooperate, officers of the Council have also been discussing this matter with their counterparts at the County Council.	Woking Borough Council	This comment is acknowledged.	Continue to carry out discussions and meetings with Woking Borough Council and other District and Borough's throughout the preparation of the SWLP.
	Stated that it seems insufficient and ineffective.	Resident	Surrey County Council acknowledge this comment but disagrees the consultation was insufficient and ineffective. Over 300 responses were received and this included over 700 comments different aspects of the draft plan. These are all being considered and will directly influence the content of the plan.	The council is continually looking to improve the way in which it consults on draft proposals and specific suggestions for doing this will be considered.
	General support for the County Council's proactive approach to ensure DtC requirements are met in the preparation of the plan in accordance with the NPPG.	Biffa	Acknowledgement of support.	No actions arising.
	Concerns regarding the encroachment of residential and associated development proposed within the Reigate & Banstead Development Management Policies document this is currently undergoing consultation.	Biffa	Surrey County Council recognises this concern. Policy 7 safeguards existing and allocated waste sites.	Implementation of Policy 7
	The proposed strategy in Reigate and Banstead's Development Management Policies document undermines the policies set out within the plan.	Biffa	Surrey County Council recognises this concern. The County Council has engaged consistently with Reigate and Banstead BC on this issue and will continue to do so.	Ongoing discussion between Reigate and Banstead BC's emerging Development Management Plan. Check Development Management Policies to ensure no conflicts/contradictions between policies.

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	The Council should also have due consideration of the draft London plan that is currently undergoing public consultation. Part of waste management strategy set out within the consultation document is a drive towards 100% net self-sufficiency. It seeks to achieve this in part by a significant reduction in the amount of waste exported outside of London for treatment. Currently, London achieves circa 60% net self-sufficiency, which has been the case for a number of years. Nonetheless, to achieve net self-sufficiency a significant amount of waste would continue to be exported outside of London for treatment.	Biffa	This comment is acknowledged. The DtC report documents discussions held with GLA and London Boroughs through SEWPAG and the London Waste planning Forum. SEWPAG responded to the Draft London Plan. The plan specifically recognises that waste from London will need to be managed within Surrey.	No action arising
	The draft London plan requires Borough Councils to engage with Authorities outside of London, where waste is proposed to be exported for disposal and/or treatment. It is not clear whether such discussions have taken place, however this strategy clearly has implications for the delivery of the London Plan given that landfill capacity in surrounding regions is declining rapidly. There is therefore an obligation for Surrey to engage with the Mayor's Office as early as possible to ensure that the policies proposed in the plan will not be undermined by the strategy within the draft London Plan.	Biffa	This comment is acknowledged. The DtC report documents discussions held with GLA and London Boroughs through SEWPAG and the London Waste planning Forum. SEWPAG responded to the Draft London Plan. The plan specifically recognises that waste from London will need to be managed within Surrey.	Ongoing dialogue with Borough Councils within London.
	There is no evidence of Surrey County Council's willingness to engage with other authorities on a one to one or group basis.	Resident	Surrey County Council is willing to carry out meetings to discuss other authorities' comments on the documents. Amongst other things the council is an active member of SEWPAG. See the Scoping Statement "Actions and outcomes under the Duty to Cooperate" for evidence of past meetings with authorities to discuss the plan. This document is a 'living document' and will be updated as new discussions take place.	Continue to update this table to ensure evidence is provided to show the county council's willingness to engage with other authorities. Be willing and open to accept meetings with authorities who wish to discuss the plan in further detail. Continue membership of SEWPAG.
	The DtC and update statement was considered to lack environmental strategy.	Resident	This comment is acknowledged. The DtC report addresses the Duty rather than an 'environmental strategy'.	No action arising
	Acknowledgement of the amount of work that has gone into this.	Resident	Surrey County Council recognises this comment.	No actions arising.
	Acknowledgement that Runnymede is listed as a	Runnymede Borough Council	Surrey County Council recognises this comment.	No actions arising.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	'Relevant Authority' in Appendix 1.			
	The Council acknowledge that waste is a strategic matter which is relevant to the requirement of the Duty to Cooperate and the Council are committed to working with the Waste Authority to explore the points raised further should you need.	Tandridge District Council	Surrey County Council acknowledge this comment.	Continue engagement with TDC in developing the plan.
	The Council is keen to be kept up to date on the consideration of Lambs Business Park and look forward to an ongoing dialogue.	Tandridge District Council	Surrey County Council acknowledges that Tandridge District Council is keen to keep engaging over the consideration of Lambs Business Park.	Continue to communicate and cooperate with Tandridge District Council on the Waste plan development especially around the consideration of Lambs Business Park.
	Grateful for the arrangement for officers from our two council's to meet to go through these comments, and other representations received to this Regulation 18 Consultation and, in particular, to look at opportunities for the joint working, under the Duty to Cooperate, which we would commend.	Reigate & Banstead Borough Council	Surrey County Council recognises this comment on recent discussions that have been held between the county council and the Borough Council.	Continue engagement in developing the plan.
	The Council welcomes the opportunity to discuss in more detail the issues and practical matters referred to in their response.	Spelthorne Borough Council	Surrey County Council acknowledges this offer for future discussion with Spelthorne Borough Council.	Set up a meeting with the Borough Council to discuss in more detail the issues and practical matters they raised in connection to the plan.
	Very poor consultation.	Resident	The county council made a significant efforts to publicise the consultation and received a large number of comments.	Surrey County Council to re-evaluate the consultation process and make improvements before the next round of consultations.
	Respondent felt as if the council was trying to stop people having their say, impossible to state their views/feelings.	Resident	Surrey County Council acknowledges this concern and can reassure that respondents' views on the plan are extremely valued and important. This was made clear in the consultation documentation.	No action arising
	Stated that the documents were too long to read.	Resident	Surrey County Council note this comment. However, the documentation needs to meet requirements set out in planning law, policy and guidance and is necessarily detailed and in some cases complex. A non-technical summary of the plan was made available.	Surrey County Council will look to develop executive summaries or non-technical summaries for documents which are currently long and complex. This will hopefully ensure everyone is able to understand and read the documents without difficulty.
	Interested to know whether there is future capacity in Surrey landfills for C, D & E waste	South West London Plan	This question is acknowledged and a response will be considered.	No arising actions.

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	from outside of Surrey or whether it is planned that the Surrey landfill capacity will be solely met with arisings from within Surrey.			
	Stated that the plan should be taken account of what neighbouring Authorities are considering for their own areas.	Resident	This comment is acknowledged and values the importance of taking into account the development in neighbouring authorities. This is dealt with through the DtC process and report.	Surrey County Council will also continue to meet and cooperate with neighbouring authorities to discuss the plan and other development taking place in surrounding areas which may need to be considered.
	<p>Network Rail and TfL are jointly developing Crossrail 2, the aim of which is to provide additional rail capacity in south west to north east corridor London. A triangle of land between Upper Halliford station and Charlton Lane has been identified as one of the stabling site locations and is required to operate Crossrail 2.</p> <p>We understand there is an existing permission to extend the existing strategic waste facility at this location and this is being implemented. Whilst the current Issues and Options document does not set out any specific proposals, any further explanation of this facility beyond the existing permission, could impact of the proposed sidings and potentially impact on the ability to deliver the railway. It will therefore be necessary for any further expansion of the waste facility on this site (should it be proposed) to avoid the land required to facilitate Crossrail 2.</p> <p>Crossrail 2 is committed to working with local authorities to develop our proposals and would be pleased to provide further advice in relation to the development of the plan.</p>	TfL	This comment is acknowledged.	Surrey County Council will continue to cooperate with Transport for London and will keep them up to date with the progress of the plan.
	Respondent stated that the very nature of the method for this consultation shows how flawed the consultation areas are, being asked to comment on areas without having any local knowledge.	Resident	Surrey County Council note this comment. The County Council wish for the consultation process to be as effective as possible, and will be reviewing the success of the Regulation 18 consultation based on feedback received.	Review and make necessary changes to the consultation process to improve the method for the next round of consultations.
	It is sometimes argued that where more specific	Reigate & Banstead Borough Council	This comment is acknowledged. Proximity to sensitive receptors is a factor in the Site Identification and Evaluation	Arrange a meeting with Reigate and Banstead

Theme	Summary of Comments	Raised by	Authorities' Response	Any action arising
	<p>legislation exists e.g. Environmental Health legislation that this is a sufficient safeguard to the achievement of sustainable spatial planning for waste management and this obviates the need to consider such matters at the planning policy stage. It would be helpful to recognise where other legislation has to deal with situations where decisions have already been taken on land use allocation but if factored in at an earlier stage a different spatial provision would have been optimal. So for example looking at air quality and noise issues relating to lorry movements and air quality issues relating to emissions and impacts on surrounding residential and institutional uses e.g. hospitals, decisions on locating new waste treatment and management facilities should factor in such considerations at the outset to ensure that the optimum locations are selected at the planning policy stage and not left to consider after allocations are made.</p> <p>The Borough Council would wish to receive reassurance on this from the County Council and to ensure that decisions over waste management allocations are sufficiently informed through joint and multidisciplinary working between the two authorities, reflecting their different statutory remits.</p>		<p>process. Assessment work (including Air Quality Impact assessment, Landscape and Visual Impact Assessment and Strategic Flood Risk Assessment) is being undertaken to better understand the possible implications of locating different waste facility types at each site. The results of this will be incorporated into the site development criteria.</p>	<p>Borough Council to discuss this point in further detail to provide them with reassurance. Acknowledge role of other pollution control agencies in the plan.</p>

Appendix 11 – Comments on other Background documents

Theme	Summary of Comments	Raised by	Response	Any action arising
Abbreviations List	An abbreviations list would have been useful. According to "Draft Waste Local Plan" (p. 20), "other" includes recycling and metal/ELV, where ELV means End of Life Vehicle	Claygate Parish Council	Noted	The Submission plan document will include a list of abbreviations.
Annex 1 Shortlisted Sites	Site description for Lyne Lane STW is inaccurate. Runnymede Borough Council believe it should read: "The site is an undeveloped piece of land comprised of scrub and poor quality grassland that was previously used as a composting facility. The site is located to the north west of Chertsey and Addlestone, to the south east of Virginia Water and the south of Thorpe. The site is bounded to the south by a rail line, with agricultural land beyond, to the west by the M3 motorway, to the east by Chertsey STW and recycling centre, and to the north by the intersection of the two motorways."	Runnymede Borough Council	Noted	The site description has been reviewed and will be amended in the light of these comments.
Annex 1 Shortlisted Sites	Land adjacent to Trumps Farm is in close proximity to the Council's proposed residential led allocations at Virginia Waste South and the Longcross Garden Village. Lack of information has been provided on the proposed uses making it difficult to comment whether there would be an adverse impact on these allocations. The Council would wish to ensure that there would be no conflict between the two emerging local plan allocations and the use of RU02C.	Runnymede Borough Council	Noted. The county council is currently undertaking assessment work to understand the potential impact of different types of waste related development. These assessments will consider the in-combination impact of development from other plans to ensure that there is no conflict or unacceptable cumulative impact from development.	Annex 1 Development criteria for sites to be updated to reflect any key information identified by the assessment work.
Draft Waste Local Plan	"Draft Waste Local Plan" (p. 17) uses categories including	Claygate Parish Council	Noted.	This will be clarified in the Submission plan.

Theme	Summary of Comments	Raised by	Response	Any action arising
	“waste from households”, which “refers to all waste collected by Surrey CC and the 11 districts and boroughs”, but says that approximately 86% of waste from households is “household waste”. The other 14% apparently includes “street cleaning, parks and grounds, business and construction”. Of these, the last two seem to overlap with “commercial and industrial” and “C, D & E”. This section surely needs clarification.			
Non-Technical Summary	Doesn't include policies	Resident	Noted.	The Non-Technical Summary of the SWLP will be amended to include the policies.
Non-Technical Summary	Concern that the non-tech summary p.8 shows that it is assumed that Surrey will produce essentially the same amount of waste in 2033 as now - which is a questionable assumption	Claygate Parish Council	The Non-Technical Summary states that; overall, the amount of waste produced in Surrey is expected to rise from 3,517.018 tonnes per year in 2018, to, 3,830,000 tonnes per year in 2033. All assumptions are questionable but this is considered to be the best estimate of what might happen in future - this is explained in the Waste Needs Assessment.	No action arising.
Waste Management Facilities	Insufficient attention is given in this document to the potential contribution of anaerobic digestion (AD) which should be seen as a priority waste management facility with its scalability, focus on removing biodegradable waste and potential to harness energy.	Guildford Residents Association	Noted.	No action arising.
Waste Management Facilities	Energy from waste includes AD. Either “energy from waste” (EfW) should be sub-divided into biological and incineration, or EfW should be renamed as “incineration and other thermal processes”.	Guildford Residents Association	Noted.	No action arising.
Waste Management Facilities	The potential contribution of pre-treated, stabilised landfill	Guildford Residents Association	Noted.	No action arising.

Theme	Summary of Comments	Raised by	Response	Any action arising
	should also be included as a management option with a potential part to play. If material is stable, landfill of some material can be a good option as part of an overall strategy that recovers value first. The waste hierarchy and directive are primarily intended to recover value and remove unstable, polluting material from landfill rather than to stop all landfill. In some cases, a volume of material to landfill may be a better option than a smaller volume of hazardous material to landfill that has been through a thermal process. c10% of municipal waste to landfill can be a good option if overall more treatment is higher up the hierarchy than energy recovery.			
Waste Management Facilities	The explanations given in this Note are inaccurate and inadequate to allow officers and councillors to make considered decisions on the type and placement of future infrastructure. EfW is a generic term used to describe anaerobic digestion as well the various forms of incineration (mass-burn, gasification, pyrolysis). References to discussion and controversy, should be included especially when these point towards a very finite future indeed for some of the technologies being suggested.	Resident	Noted. The information in this report is derived from reputable sources. The report is intended to be an informative and objective document informing interested parties about different types of waste management facility, and the county council consider that it delivers this aim.	No action arising.
Waste Needs Assessment	Several respondents raised detailed comments on the WNA. Amongst these were: - Concerns regarding recycling targets; - Consideration of the impact of other development on waste needs; and, - How the capacity gap is calculated for each waste stream.	Grundons, Residents, CPRE Surrey, Hampshire CC, Guildford Residents Association.	All concerns have been logged and noted and will be addressed during the next stage of the plan, when the WNA will be refreshed to incorporate the most recent data.	Refresh WNA and incorporate any necessary changes highlighted as part of this consultation.
Waste Needs Assessment	Safeguarded sites on the Hampshire/Surrey border: - Rushmoor HWRC/Transfer Site, Eelmoor Road, Farnborough - Lynchford Lane WTS, Farnborough - Aldershot Garrison STW - Hollybush Lane, Aldershot	Hampshire County Council	This comment is acknowledged.	No actions arising.

Theme	Summary of Comments	Raised by	Response	Any action arising
	<ul style="list-style-type: none"> - Unit 3 & 4 Stubs Industrial Estate - Universal Car Spares - Chambers Waste Management - 1A Hollybush Industrial Park - Ivy Road HWRC, Aldershot <p>Reports from the WDI (2016) show that Surrey exported 50,865 tonnes of inert waste to three of Hampshire's safeguarded sites that are adjacent to the Surrey border; 1A Hollybush Industrial Park, Hollybush Lane Waste Transfer Station & Recycling Facility and Lynchford Lane Materials Recycling Facility. I am not aware of any reason why any of these site would not continue to operate in the future and should not have particular planning issues continuing to receive Surrey's waste.</p>			