

Surrey Waste Plan
Freepost SEA 12430
Thornton Heath
Surrey
CR7 7XT

18 August 2006

Dear Ms Herbert,

**SURREY MINERALS AND WASTE DEVELOPMENT FRAMEWORK –
SURREY WASTE PLAN SUBMISSION DRAFT**

Under the provisions of Section 24 of the Planning and Compulsory Purchase Act 2004 (the Act) the Assembly has assessed the general conformity of the Surrey Waste Core Strategy submission document against the adopted Regional Spatial Strategy (RPG9 and Alterations) and also the emerging Regional Spatial Strategy (the draft South East Plan) as submitted to Government on 31 March 2006.

Members of the Regional Planning Committee consider the Surrey Waste Core Strategy to be in general conformity with both the adopted and emerging RSS. However, a number of specific aspects of the Waste Core Strategy have been identified which do not appear to have had full regard to the adopted or emerging RSS. The Assembly has therefore submitted detailed representations on these matters. These representations are submitted on the basis of PPS12 (2004) 'Test of Soundness' Test iv. The details of the representations submitted are set out in the attached documentation.

If you wish to discuss any aspect of our representations, please contact Sue Janota on 01483 555200 or suejanota@southeast-ra.gov.uk.

Yours sincerely,



Paul Bevan
Chief Executive

South East England Regional Assembly - Representations

Representation 1

Paragraph B39

Policy W13 of both the draft South East Plan and RPG9 (adopted alterations) requires Waste Development Documents (WDD's) to provide for continuing but declining landfill capacity. Policy CW4 of the submitted document makes provision to meet declining landfill needs of residual waste arising in Surrey and exported from London, and achieve regional diversion targets from landfill. This is further supported in Table 2.3.

However, the first sentence of supporting paragraph B39 of the Waste Core Strategy wrongly interprets -0.8 million tonnes (mt) in Section D6, Table 2¹ of the draft South East Plan as surplus landfill capacity instead of a deficit. This misinterpretation could cause the under provision of required landfill capacity up till 2015.

It is recommended that the first sentence of paragraph B39 should be corrected to acknowledge the deficit in landfill capacity till 2015 identified in the draft South East Plan, and recognise the need to identify additional void space.

Representation 2

Policy CW4 (i)

We welcome the reference in Policy CW4 (i) to making a contribution to meeting a declining amount of waste from London. However, we would like to see a commitment in the policy to achieving the regional apportionment target for Surrey for London imports.

Representation 3

Paragraph 1.2.1

Policy W15 of both the draft South East Plan and RPG9 (adopted alterations) requires WDD's to make the following provision for hazardous waste:

- Identify and safeguard sites for storage, treatment and remediation of contaminated soils and demolition waste
- Identify criteria for the determination of large scale specialist hazardous waste facilities
- Assess available landfill provision and, where necessary, encourage the creation of a protective cell for stable hazardous waste.

Though bullet point 4 of paragraph 1.2.1 of the Surrey Waste Plan recognises the generation of hazardous waste in Surrey, policy provision is not made for the management of hazardous waste in the submitted Waste Core Strategy.

¹ Errata note shows correct location of Table 2 in South East Plan. http://www.southeast-ra.gov.uk/southeastplan/plan/view_plan.html#errata

We would expect to see policy provision for management of hazardous waste in the Surrey Waste Core Strategy in line with the criteria set out in both the draft South East Plan and RPG9 (adopted alterations). If hazardous waste policy is to be included in other DPD/SPDs appropriate cross references must be made in the Waste Core Strategy.

Representation 4 Proposals Map

RPG9 (adopted alterations) and the draft South East Plan Policy W17 (and supporting paragraphs 18.1 to 18.4) indicate the need for WPA's to adopt a site specific approach in provision of identified waste management facilities.

The Proposals Map of the submitted document provides for waste sites identified in Policies WD1, WD2, and WD5. This covers Civic Amenity Sites, Recycling, Storage, Transfer, Materials Recovery, and Thermal Treatment Facilities. However, landfill sites are not identified and safeguarded in a similar manner despite the need to provide for a deficit capacity in landfill as outlined in Section D6, Table 2² of the draft South East Plan.

It is recommended that the Surrey Waste Plan and the Proposals Map should identify the broad locations of landfill waste sites to reflect regional waste policy guidance in both the draft South East Plan and RPG9 (adopted alterations).

² Errata note shows correct location of Table 2 in South East Plan. http://www.southeast-ra.gov.uk/southeastplan/plan/view_plan.html#errata