

### **A. Time to match words with action – and have a Waste Plan consistent with the Circular Economy.**

We restate our previous comments that Surrey's waste strategy and waste plan still need to shift from a position of prioritising incineration as the solution to waste disposal. In light of the Climate Emergency Surrey County Council has declared, low greenhouse gas solutions need to be the priority in the plan. This means scaling up the investment in waste reduction, reuse and recycling to the point where far, far less waste needs to be thrown away.

The waste strategy still, in this apparently final form, seems to be over predicting the amount of waste arisings in Surrey. In 2018/2019 the total municipal waste collected across Surrey was 526, 567 tonnes. So the 536,000 tonnes in the Waste Plan for 2017 has since *fallen*. But the waste plan still predicts a continued increase in total municipal waste volumes. This needs to be updated and reflected in the text, with more realistic projections.

In 2018/19 Surrey recycled and reused just over 55% of waste – making it the second best performing local authority in England. The Plan has a higher target for recycling of 75% which is welcome, but reducing what we throw away is crucial. In the same year Surrey residents threw away on average 189 kg of waste per household which should be reduced as people throw away less, encouraged by the Strategy. There is huge scope for improvement here and incineration is not the way to address the issue.

Similarly it is unclear where the evidence lies for a near doubling of predicted commercial and industrial waste from 2017 to 2035 in Surrey. The government's new waste policies mean that residual waste that cannot be reused, recycled or otherwise materially recovered (e.g. to aggregate recycling from demolition waste) should be reduced, as should the total volume of construction and demolition waste that cannot be reused or recycled in Surrey over the next 15 years.

The government introduced a new set of waste policies for the UK in 2018, which Surrey appear to match in the aspiration for a more circular economy. This should be reflected in the Waste Plan. It appears that changes to a circular economy are just talk – they *must* result in material changes to waste flows.

This then would eliminate the need for much of the proposed waste disposal capacity. Higher reduce, reuse and recycling targets in Surrey – matched by national policy, legislation and finance to make this happen - would remove the need for new waste disposal capacity in Surrey.

### **B. Industrial Estates – circular economy jobs or yet more potential sites for burning waste?**

This latest, supposedly final, version of the waste plan introduces the potential for energy-from-waste plants at the majority of the Industrial Land Areas of Search (ILAS) included in the plan. This is a shocking change of direction and threatens to

spread environmental impacts across multiple locations. No strategic assessment of the environmental impacts of developing EFW technology at multiple sites has been made. Yet 18 sites are identified as areas with “potential for waste development” (1.2.1 Part 2 of the Surrey Waste Local Plan). They are described as potentially suitable areas for a small scale thermal treatment facility – yet this is described as anything up to 50,000 tonnes of waste a year, which is still a significant scale of plant. Any assessment is left to the planning application stage, when it will be too late to carry out a strategic EIA across all the sites affected (2.1.1.2). This approach is challenged for the following reasons.

### **1. Scale proposed is inappropriate**

The plan proposes the potential for an Energy-from-Waste (EfW) plant up to 50,000 tonnes a year (which is as big as the gasification plant in the Eco Park) in 18 of the Industrial Land Areas of Search included in the finalised version of the Surrey Waste Plan (2.2.2.2). Because the level of waste is over estimated in the plan the approach blights all the areas included in the SWLP as being at risk of having a small scale incinerator, until otherwise ruled out. In all cases the sites are described as being near to residential areas, which might be at risk of pollution.

This is not feasible. There is no space to hide an energy-from-waste plan – at a similar scale to the gasification plant at the Charlton Lane Ecopark, in most of the industrial estates listed. They currently have industrial uses, with a high level of occupancy. Also these sites are prime employment sites. Shifting to waste disposal of such a kind on any of these sites is likely to result in a local loss of employment and opportunities for other businesses to develop and grow. Placing an incinerator in any of these industrial sites will also bring more HGVs onto local roads, leading to congestion and worsening of local air quality.

### **2. Climate Emergency**

Such a massive expansion of energy from waste technology is likely to result in an increase in greenhouse gas emissions from Surrey’s waste. Because burning waste produces so many carbon emissions, using this to generate electricity will result in the electricity produced being higher-carbon at a time when electricity is being decarbonised. This does not fit as part of a zero carbon future for Surrey, or the UK.

### **3. Not viable or feasible.**

The placement of an energy-from-waste plant in any of the ILAS is neither feasible nor commercially viable. This updated version of the plan suggests it is possible to place a EfW plant up to 50,000 tonnes in size almost anywhere in the list of potential sites across Surrey – that there are no real constraints. This is simply not the case. It is not clear that sufficient evidence has been produced, such as in the form of a pre-feasibility assessment, to determine that all of these sites are indeed viable. The ILAS is not itself a ‘suitable location’ – a suitable location still needs to be identified in the industrial area – some of the areas of search are large and fall into multiple local authority areas.

### **4. ILAS as opportunity areas for the circular economy – not waste-to-heat.**

We support the proposal for small-scale anaerobic digestion technology being used more widely. We further propose that the ILAS are opportunities to establish and develop centres for reuse and recycling – with the jobs that go with that. This means employment intensive waste reuse, reprocessing, refurbishment, remanufacturing and high value recycling activities. This would be consistent with these as areas of employment and the opportunity to use ILAS to shift the focus of the Waste Plan from waste disposal (which historically has been to landfill and incineration) to waste management, repurposing waste into new product and materials in these locations.

## **5. Anaerobic Digestion of Sewage Waste – Welcome**

We recognise the inclusion of this in the Waste Plan as a specific opportunity that can be realised within the plan period.

### **C. Comments on Allocated Sites**

#### **1. Oakleaf Farm, Stanwell Moor**

This site has had a series of planning permissions in recent years which have extended the number and times of vehicle movements to the extent that this almost has a 24-7 operation permission already. The access route (not through Stanwell village) needs to be enforceable. Continued expansion and weakening (widening) of what can be carried out at this site is not supported.

#### **2. South Godstone**

The plan proposes to increase the size of the plant from medium to large at this site and implies that if it is small or medium then access via rail for a waste facility at this location is no longer recommended and/or required. This change is not supported.

### **D. Comments where we have received them from residents local to these ILAS sites**

#### **Longmead Industrial Estate, Epsom.**

A thermal treatment facility here will further aggravate local disruption caused by ever more HGVs thundering along access roads to the already large recycling centre on Longmead Rd. They are a constant cause of traffic jams and some arrive around midnight and early morning hours. Worst still, Longmead Road hosts a large secondary school directly opposite the Industrial Centre and Refuse/Recycling plant, and a primary school close by. It is surrounded by dense housing so an incinerator is the last thing we want polluting our atmosphere.

#### **Perrywood Industrial Site**

This industrial site is not visited frequently by HGVs, therefore positioning an incineration plant here will greatly increase HGV traffic. Access to this site for HGVs is awkward; the route from the A23 goes through a busy residential area with parking on both sides of the road and, just before the site entrance, on-street residential parking causes the road to reduce to one narrow lane with limited sightlines. Access from the East would need to be controlled as this leads into a network of narrow country lanes unsuitable for HGVs. The Gatwick-Greenwich cycle route shares the access road to the industrial site, as does one of the pedestrian access routes to Salfords station. At weekends the access road is used by young people and families coming to sports matches on the adjacent playing fields.

#### **Curtis Road, Dorking**

This industrial estate is at the foot of the North Downs and visible from the hills around Dorking. Any chimney will have a major impact both visually and any emissions could impact on the nearby primary school and the organic allotment site on Ranmore. It is close to residential properties including sheltered accommodation

for elderly people. The roads accessing the industrial estate from the A roads are frequently congested in rush hour and sometimes outside it when other major roads are closed. Any addition to traffic levels in already congested Dorking, with its two A roads, would have a significant impact.