

Statement of Common Ground

Concerning Strategic Planning Policies for Waste Management in  
Surrey

April 2019



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|                |  | To all districts and boroughs   | 02 April 2019 |
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## Contents

|  |    |
|--|----|
| Introduction .....   | 4  |
| 1. Parties Involved .....  | 4  |
| 2. Signatories.....  | 5  |
| 3. Strategic Geography.....  | 6  |
| 4. Strategic matters.....  | 9  |
| 5. Common Ground between the County Council and the District and Borough Councils..... | 11 |
| 5.1 Safeguarding of Existing and Planned Waste Management Facilities .....             | 11 |
| 5.2 Locating New Waste Management Facilities .....                                     | 12 |
| a) Previously Developed Land and Industrial Land Areas of Search (ILAS) .....          | 13 |
| b) Strategic waste site allocations.....   | 14 |
| c) Allocation of a Site for a Household Waste Materials Recycling Facility .....       | 14 |
| 5.3 The Landfill of non-inert Waste .....  | 15 |
| 5.4 Wastewater Treatment .....   | 15 |
| 6. District and Borough Specific Matters (Where relevant).....                         | 16 |
| 6.1 Elmbridge Borough.....   | 16 |
| 6.2 Guildford Borough .....  | 17 |
| 6.3 Mole Valley District.....  | 19 |
| 6.4 Reigate & Banstead Borough.....  | 20 |
| 6.5 Runnymede Borough .....  | 20 |
| 6.6 Spelthorne Borough .....   | 21 |
| 6.7 Surrey Heath Borough.....  | 22 |
| 6.8 Tandridge District .....   | 23 |
| 6.9 Woking Borough.....  | 23 |
| 7. Delivery and Governance arrangements for the planning of waste management.....      | 24 |
| 8. Timetable for agreement, review and update .....                                    | 25 |
| Appendix – Relevant Development Plan documents and stages of review.....               | 26 |

## Introduction

Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries<sup>1</sup>.

Surrey County Council is currently updating the planning policies on waste management. Borough and district local plans are at different stages. For a full list of the relevant adopted Development Plan Documents in Surrey, including the stages of review, see Appendix.

This document represents a Statement of Common Ground (SoCG) between Surrey County Council and the eleven district/borough councils within Surrey. It sets out areas of common ground and disagreement<sup>2</sup> on strategic matters relating to the planning of waste management in the county. Where there are any outstanding matters, the document sets out any action being taken to address these.

Specifically, this SoCG covers the following strategic matters:

- Safeguarding of waste management facilities
- Locating new waste management facilities
- Landfill of non-inert waste
- Wastewater treatment

## 1. Parties Involved

This Statement of Common Ground is between Surrey County Council and the Borough and District Councils within Surrey namely:

Elmbridge Borough Council  
Epsom & Ewell Borough Council  
Guildford Borough Council  
Mole Valley District Council  
Reigate & Banstead Borough Council  
Runnymede Borough Council  
Surrey Heath Borough Council  
Spelthorne Borough Council  
Tandridge District Council  
Waverley Borough Council  
Woking Borough Council

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<sup>1</sup> Paragraph 24 and 25 of the revised National Planning Policy Framework

<sup>2</sup> Areas of disagreement or 'uncommon ground' are those areas where agreement between the parties does not exist. These are listed in Section 7 'District and Borough Specific Matters' along with specific areas of agreement.

## 2. Signatories

Surrey County Council, Cabinet Member for Environment and Waste, [Date]

Elmbridge Borough Council, Portfolio Holder for Planning Services, [Date]

Epsom & Ewell Borough Council, Chairman of Licensing & Planning Policy Committee, [Date]

Guildford Borough Council, Lead Councillor for Planning and Regeneration, [Date]

Mole Valley District Council, Cabinet Member for Planning Policy [Date]

Reigate & Banstead Borough Council, Portfolio Holder for Planning Policy, [Date]

Runnymede Borough Council. Chair of Planning Committee [Date]

Surrey Heath Borough Council: Informally agreed by officers and portfolio holder pending formal consideration by Executive on 28 May 2019.

Spelthorne Borough Council [Date]

Tandridge District Council, Leader (or Chairman of Planning Policy Committee) [Date]

Waverley Borough Council, Leader, [Date]

Woking Borough Council, Portfolio Holder for Planning, [Date]

### 3. Strategic Geography

- 3.1 Surrey County Council is the waste planning authority for the two tier area of Surrey with responsibility for planning for the future management of waste in the county by preparing relevant strategic policies. The eleven borough and district councils within Surrey have responsibility for planning other development such as housing and employment as well as helping to ensure that waste is managed in accordance with the Development Plan<sup>3</sup> when determining planning applications<sup>4</sup>.
- 3.2 Surrey's location and unique environment (see Figure 1) influence the structure and composition of the economy in terms of the dominant business sectors, the availability of development land and the distribution of the resident population. These factors also contribute to the quality of life enjoyed by Surrey's residents. In turn, these factors also present opportunities and challenges for future growth and will influence the form and location of new waste development.
- 3.3 The 2011 census found there to be some 1.14 million people living in Surrey. Estimates for 2017 show an increase in the total population to 1.19 million people. While the majority of the county can be classed as rural in nature, there are urban areas located in the north of Surrey, near the boundary with London, and also in the form of the large towns of Guildford, Woking, Reigate/Redhill, Leatherhead, Camberley and Farnham. Projected population growth for Surrey over the next two decades, suggests an increase from 1.18 million people to 1.37 million by 2037.
- 3.4 There are approximately 483,000 dwelling houses distributed across Surrey with development of a further 86,000 households forecasted between 2015 and 2033<sup>5</sup>.
- 3.5 Surrey County Council has a duty to plan for the key aspects of the infrastructure that will be required to support those new homes, which includes additional waste management capacity. Waste management is a key component of a modern economy. All businesses depend on the efficient management of their waste and the waste management sector itself will generate employment and add value to the local economy.
- 3.6 The strategic road network, comprising motorways and trunk roads, has evolved principally to serve London, with several nationally important routes passing through the county, including the M3, M23, M25 and the A3. This means that waste arising in one area of the county can easily be transported to another area for management. Some waste is also transported into Surrey from neighbouring areas for management and similarly, some waste arising in Surrey is managed beyond the county boundaries.

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<sup>3</sup> This includes in accordance with the Waste Hierarchy (See Appendix A of National Planning Policy for Waste. The waste hierarchy expects waste to be managed in the following order of preference: Prepared for reuse; Recycled and/or composted; Recovered in ways other than recycling/composting; and, finally, Disposed).

<sup>4</sup> See paragraph 8 of National Planning Policy for Waste and Planning Practice Guidance para ref.: ID 28-010-20141016

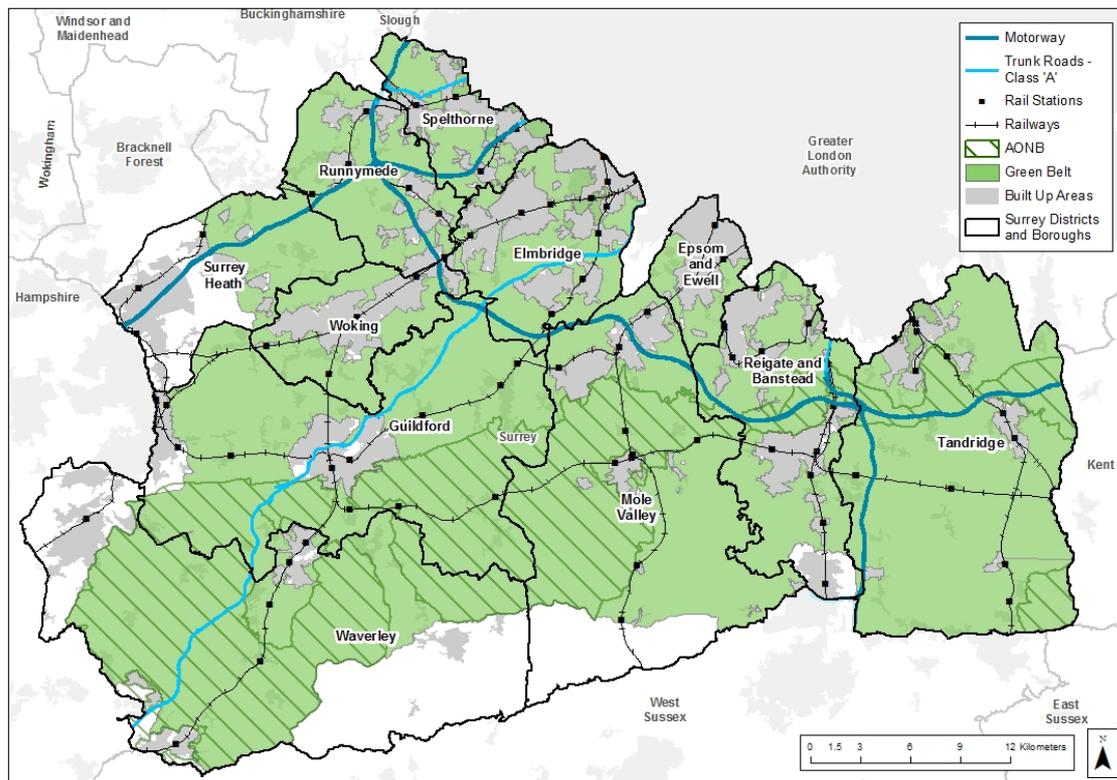
<sup>5</sup> MHLG 2014 based household projections in England, 2014 to 2039

- 3.7 Surrey roads are known to experience congestion and the county council is seeking to promote development which includes options for sustainable transport. However, alternative transport options are limited within the county and consequently many business sectors, including the waste management sector, are heavily reliant on road transport.
- 3.8 The Surrey Hills Area of Outstanding Natural Beauty (AONB) and a small area of the High Weald AONB cover approximately 26% of the county. AONBs have a protected status that reflects the unique character of their landscapes.
- 3.9 73% of Surrey is located within the Green Belt and this places a significant constraint on development. Waste management is considered to be inappropriate development within the Green Belt and so can only be permitted if very special circumstances exist. The boundaries of the Green Belt are defined by district and borough councils in their Local Plans, and to be consistent with national policy<sup>6</sup>, these boundaries can only be changed in exceptional circumstances. A total of nine sites designated for their nature conservation interest at an international and/or European level are located wholly or partly within Surrey. Those sites include four Special Protection Areas (SPAs) designated under the EU Wild Birds Directive, three Special Areas of Conservation (SACs) designated under the EU Habitats Directive, and two Ramsar Sites designated under the Convention on Wetlands of International Importance.
- 3.10 An area of some 12,000 hectares within Surrey is covered by ancient woodland that is land known to have had continuous tree cover since at least 1600 AD. Ancient woodlands are found throughout Surrey, with particular concentrations in the North Downs and the Weald. Ancient woodlands, and veteran trees, are of value for their biodiversity interest, as well as cultural and historical significance.
- 3.11 In Surrey (especially in the northwest of the county), the combination of a large population, low lying land and a significant number of watercourses, increases the probability of people, property and the environment being adversely affected by any flood events that do occur.
- 3.12 Due to particular constraints on development within the greater London urban conurbation, and the fact that Surrey neighbours this area, waste arising in London may be exported to Surrey for management. This issue is addressed in separate SoCG between the county council and certain London borough councils.

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<sup>6</sup> See NPPF paragraph 136.

Figure 1: Location of Surrey and the eleven boroughs and districts



3.13 While this SoCG is concerned with planning for future management of waste, other SoCGs may exist between Surrey County Council and the boroughs and district councils concerning other strategic cross boundary matters.

## 4. Strategic matters

- 4.1 The management of waste is an inherently strategic matter as waste that arises in one area is frequently managed in a different area. Economies of scale also mean that strategic<sup>7</sup> waste management facilities generally have a catchment wider than the borough or district within which they are located. This means that decisions to locate a waste management facility in a certain area will impact not just on that area but other neighbouring areas and beyond.
- 4.2 The emerging Surrey Waste Local Plan has identified that, overall, Surrey remains net self-sufficient<sup>8</sup> with a surplus of waste management capacity but within this there are some key areas of need to be addressed by the new SWLP.
- 4.3 Currently a need for additional recycling capacity over the period of the SWLP has not been identified overall but there is an identified need for facilities which fall under the definition of 'other recovery'<sup>9</sup>. However, the Plan will always encourage the management of waste by activities which are higher on the waste hierarchy and within different types of recycling there may still be a need for further capacity e.g. need for more bulking and storage capacity at Community Recycling Centres.
- 4.4 In particular, in light of the lack of capacity in Surrey for the management of 'Dry Mixed Recyclables' (DMR) (e.g. paper, cardboard, glass, metal and plastic) collected from households, a specific site has been identified for this purpose at Trumps Farm within the borough of Runnymede.
- 4.5 The emerging Surrey Waste Local Plan (SWLP) includes policies, as well as site allocations and areas of search which are intended to address this issue.
- 4.6 Furthermore, the SWLP sets out policy concerning the development of capacity for the treatment of wastewater (including sewage). The need for wastewater treatment capacity is very much a function of the level of development, e.g. housing, in an area and so estimates of future requirements are based on the level and nature of development that can be expected in future. District and Borough Councils are largely responsible for planning for future development in their Local Plans and so it is important that policy on future wastewater treatment capacity, prepared by the County Council, takes account of the adopted and emerging district and borough Local Plans.

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<sup>7</sup> A 'strategic' facility is taken to be a facility that manages at least 20,000 tonnes of waste per annum.

<sup>8</sup> 'Net self-sufficient' means that the existing waste management capacity within an area is equivalent to the quantity of waste arising in that area.

<sup>9</sup> 'Other recovery' is capacity capable of managing waste by a means other than landfill but does not including recycling and composting. Energy from waste is a common form of 'other recovery'.

4.7 In light of the above it is considered that the particular strategic matters of concern to both the County Council and the district and borough councils are as follows:

- The allocation of land for waste management;
- identification of areas of search;
- safeguarding existing and planned<sup>10</sup> waste management sites; and,
- provision for wastewater management capacity.

4.8 The areas of common ground between the County Council and the district and borough councils on the strategic matters are set out in detail below. There are also areas of disagreement between the County Council and particular district and borough councils and these are specified in Section 6.

4.9 It should be noted that there are policies concerning waste management within the SWLP which will require implementation by the district and borough councils. As the SWLP forms part of the Development Plan, where relevant these policies will, as a matter of course be implemented by the district and borough Councils when assessing planning applications. These matters are not considered to be 'strategic' although the county council has carefully considered any district and borough council concerns with the nature and wording of these policies. The matters include:

- The beneficial use of inert waste<sup>11</sup> (generally produced from construction, demolition and excavation activities);
- The production, storage and collection of waste associated with all forms of development other than that related to waste management facilities.

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<sup>10</sup> 'planned' in this context means permitted or allocated

<sup>11</sup> Inert waste means waste that does not undergo any significant physical, chemical or biological transformations.

## 5. Common Ground between the County Council and the District and Borough Councils

### 5.1 Safeguarding of Existing and Planned Waste Management Facilities

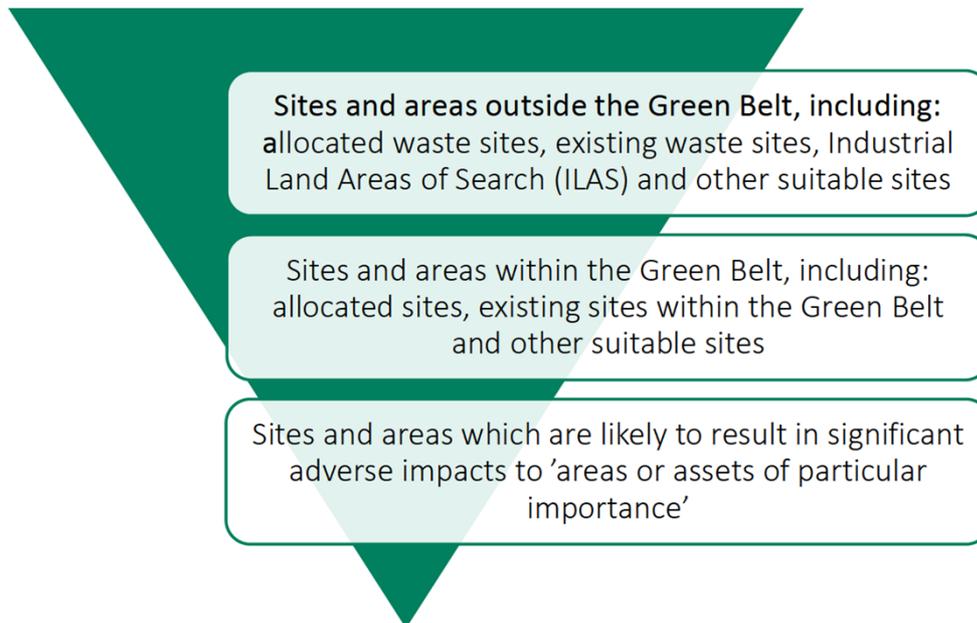
- 5.1.1 The purpose of safeguarding waste sites, is to ensure that the need for existing or planned waste management infrastructure is taken into account when decisions are made on all new development in Surrey. This is considered to be a strategic matter, as, when taken as a whole, the existing waste management facilities within Surrey play an important strategic role in ensuring that waste arisings can be adequately managed.
- 5.1.2 As the responsibility for determining the majority of planning applications for non-waste related development in Surrey lies with the borough and district councils, these authorities agree that they have a shared responsibility for ensuring the safeguarding of waste management facilities through implementation of the Development Plan.
- 5.1.3 The Surrey Minerals and Waste Consultation Protocol<sup>12</sup> has been agreed by the county council and the district and borough councils and sets out how they will work together constructively to ensure waste safeguarding issues are taken into account as appropriate during the preparation of local plans and in the determination of planning applications.
- 5.1.4 The eleven borough and district councils will work together with the county council to ensure that the protocol and associated standing advice is maintained to provide up to date guidance on safeguarding issues. In particular, joint work will be undertaken to update the protocol following adoption of the SWLP.

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<sup>12</sup> Minerals & Waste Consultation Protocol. Surrey County Council, October 2016

## 5.2 Locating New Waste Management Facilities

- 5.2.1 All twelve authorities recognise that in order to meet future requirements of waste management in Surrey additional development will be necessary<sup>13</sup>. The authorities agree that the spatial strategy for the development of new waste facilities set out in the SWLP is appropriate. This strategy articulates broad preferences for development on certain types of land and in accordance with the hierarchy below:



- 5.2.2 The authorities also agree that, whilst the Plan provides a steer as to particular locations and types of land where development might be suitable, all policies of the Development Plan, including the Surrey Waste Local Plan will be taken into account when determining the suitability of proposals, and so, depending on its exact nature, development may in fact not be suitable in those locations or on those types of land. General policies in the Plan (including Policy 1 and Policy 14) are included which will ensure that development that is proposed which is unsuitable, due to likely impacts on communities and the environment, because, for example, of its size, appearance and nature, or is not required will not be granted planning permission.
- 5.2.3 The Authorities agree that development of waste management uses on any land will be subject to landowner agreement.

<sup>13</sup> [This is evidenced by the 'Waste Needs Assessment', January 2019](#)

### a) Previously Developed Land and Industrial Land Areas of Search (ILAS)

- 5.2.4 In many instances, the recycling and processing of waste can be carried out within modern, purpose-designed buildings that can be located in urban areas and industrial estates. In light of this, when reviewing local plans, district and borough councils agree to acknowledge within their Local Plans that locating waste management facilities on industrial estates and on other suitable previously developed land is may be acceptable in principle.
- 5.2.5 Industrial Land Areas of Search (ILAS) have been identified in Part 2 of the emerging SWLP within which it is agreed that land which is suitable for waste management development is more likely to be found (subject to any particular points of clarification added in Section 6). The ILAS comprise land over five hectares<sup>14</sup> identified or allocated in relevant local plans as being suitable for B2 and/or B8 uses. The ILAS are listed by district and borough below. It is agreed, in principle, that the approach taken to identify the ILAS<sup>15</sup> is appropriate.

| <b>Industrial Land Area of Search</b>   | <b>District/Borough</b> |
|---|-------------------------|
| 1 Brooklands Industrial Pk, Wintersells Road Industrial Pk and Byfleet Industrial Est | Elmbridge and Woking    |
| 2 Molesey Industrial Estate, West Molesey   | Elmbridge               |
| 3 Hersham Road North and Lyon Road / North Weylands, Walton-on-Thames                 | Elmbridge               |
| 4 Longmead Industrial Estate  | Epsom and Ewell         |
| 5 Slyfield Industrial Estate  | Guildford               |
| 6 Woodbridge Meadows  | Guildford               |
| 7 Land around Burnt Common warehouse, London Road, Send                               | Guildford               |
| 8 North and south of Lysons Avenue, Ash Vale  | Guildford               |
| 9 Riverway Industrial Estate, Astolat Business Park and Weyvern Park at Peasmarsh     | Guildford               |
| 10 Land near Dorking West Station, Curtis Road/Station Road                           | Mole Valley             |
| 11 Holmethorpe Industrial Estate  | Reigate and Banstead    |
| 12 Perrywood Business Park  | Reigate and Banstead    |
| 13 Salfords Industrial Estate   | Reigate and Banstead    |
| 14 Thorpe Industrial Estate   | Runnymede               |
| 15 Byfleet Road Employment Allocation   | Runnymede               |
| 16 York Town Industrial Estate, Doman Road and Stanhope Road                          | Surrey Heath            |
| 17 Windmill Road, Sunbury   | Spelthorne              |
| 18 Hobbs Industrial Estate, Felbridge   | Tandridge               |
| 19 Farnham Trading Estate including Land off Water Lane, Farnham                      | Waverley                |
| 20 Land at Dunsfold Aerodrome (As part of new settlement)                             | Waverley                |
| 21 Coxbridge Business Park  | Waverley                |
| 22 Monument Way East Industrial Estate (includes Woking Business Park)                | Woking                  |

<sup>14</sup> Five hectares was considered an appropriate minimum size because ILAS are intended to be broad areas of search, not individual units or small sites with a limited number of occupiers. Therefore, 5ha was taken as an area that represented an area large enough within which it was considered likely that opportunities would come forward.

<sup>15</sup> See [Industrial Land Areas of Search Identification Report, December 2018](#)

5.2.6 Any proposal for waste management at these locations would have to demonstrate consistency with other policies in the Development Plan (including the SWLP) (see Section 7).

#### b) Strategic waste site allocations

5.2.7 It is also recognised that, due to competition from other land uses and commercial and practical considerations, the development of waste uses within ILAS cannot be wholly relied on to deliver the required waste management capacity over the plan period<sup>16</sup>. Hence the allocation of specific sites in the SWLP capable of accommodating a range of potential waste management facilities is supported in principle. The allocated sites are included in Section 6.

5.2.8 It is also agreed in principle that the approach taken to identify the site allocations<sup>17</sup> is appropriate.

5.2.9 Development for waste facilities in the Green Belt is generally regarded as inappropriate and it is agreed that very special circumstances would need to be demonstrated before the grant of planning permission could be considered. Factors which may contribute to very special circumstances would likely take account of 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. The determination of planning permission for development at sites within the Green Belt will be subject to Green Belt policy and any sites allocated in the Green Belt are not preferred over any suitable sites outside the Green Belt that might be available at that time.

5.2.10 For each allocated site, details regarding the types of waste management use that are likely to be appropriate and what is specifically agreed between the county council and the relevant borough or district council are contained in Section 6 of this SoCG. It is acknowledged that there remain some areas of disagreement and these are also set out in Section 6.

#### c) Allocation of a Site for a Household Waste Materials Recycling Facility

5.2.11 The district and borough councils, as waste collection authorities, and the county council, as the Waste Disposal Authority (WDA), are responsible for implementing the Joint Municipal Waste Management Strategy.

5.2.12 Currently residents separate certain types of recyclable waste (e.g. paper, cardboard, glass, metal and plastic) from other household waste for separate collection. The recyclable waste, known as Dry Mixed Recyclables (DMR), is collected by the district and borough councils and transported by road to facilities in Hampshire, Slough, North London, and Birmingham. The only site within Surrey that currently recycles dry mixed recyclables is the Grundon Facility at Randalls Road, Leatherhead.

<sup>16</sup> See [Report on Delivering the Spatial Strategy, January 2019](#)

<sup>17</sup> See [Site Identification and Evaluation Report, January 2019](#)

5.2.13 It is agreed that the export of DMR for management outside of Surrey is not consistent with the Surrey Joint Municipal Waste Management Strategy that seeks to maximise value for Surrey residents and treat waste as a resource in the most sustainable way<sup>18</sup>. There is therefore justification<sup>19</sup> for considering the allocation of a further site specifically for the management of DMR, although the need for an additional site and its proposed location at Trumps Farm is not agreed by Runnymede Borough Council (See Section 6.4).

### 5.3 The Landfill of non-inert Waste<sup>20</sup>

5.3.1 Waste sent for disposal to landfill should be the residues left following treatment such as recycling and recovery that cannot be dealt with in any other way. The demand for, and availability of, non-inert waste landfill capacity is reducing across the South East of England, however landfill continues to have a role. While the SWLP does not allocate a specific site for landfill, it is agreed that it is an option that needs to be planned for including through ongoing joint working with other south east waste planning authorities,

### 5.4 Wastewater Treatment

5.4.1 There is an established network of sewage facilities within Surrey that are safeguarded.

5.4.2 It is recognised that, due to the need to maintain efficiency, significant spare capacity is not maintained at WWTWs and future upgrades may therefore be required to serve growth proposed in Local Plans but, except in the case of the relocation of the existing Guildford STW, this is unlikely to involve additional land during the period of the SWLP.

5.4.3 The sewerage undertaker will continue to review and assess the capacity for WWTWs, using the best available information in relation to new development (including housing and employment allocations) and the county council will continue to engage with the district and borough councils in the preparation of their Infrastructure Delivery Plans which set out the need for additional waste water treatment capacity. Should, in future, evidence from the sewerage undertaker justify the need for more land for wastewater treatment then the county council will engage with the relevant district or borough to ensure suitable land is safeguarded through the Local Plan or a review of the SWLP.

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<sup>18</sup> See Joint Municipal Waste Management Strategy Revision 2 (2015)

<sup>19</sup> See Joint Municipal Waste Management Strategy Revision 2 (2015) Actions and Outcomes Work Area 9 Action 3

<sup>20</sup> Non-inert waste is waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.

## 6. District and Borough Specific Matters (Where relevant)

### 6.1 Elmbridge Borough

#### **Allocated site:**

#### **Former Weylands Treatment Works, Walton-on-Thames**

**Particular areas of disagreement** between Surrey County Council and Elmbridge Borough Council:

The site should not be allocated since:

- It is located in an area of strongly and moderately performing Green Belt assessments.
- A change from the current mix of uses to an alternative form of waste processing, especially if an AD or incinerator were to be developed, would give rise to unacceptable impacts on nearby housing especially from odour and noise.
- Waste development could give rise to potentially unacceptable impacts from HGV movements

Action being taken to resolve disagreement:

- Further information and discussion by way of a meeting with councillors and information exchange

#### **Industrial Land Areas of Search**

**Particular areas of disagreement** between Surrey County Council and Elmbridge Borough Council:

- The key environmental sensitivities identified in the 'Surrey Waste Local Plan, Part 2- Sites and areas of search' fail to include noise and odour. Both of these significant concerns are highly relevant for any proposed waste site development and operation within the three ILAS in Elmbridge Borough.

Action being taken to resolve disagreement:

- Further information and discussion by way of a meeting with councillors and information exchange

## 6.2 Guildford Borough

### **Allocated site:**

#### ***Land to the north east of Slyfield Industrial Estate, Moorfield Road,***

**Particular areas of agreement** between Surrey County Council and Guildford Borough Council:

- Potentially suitable for small, medium and large scale facility(s) up to and potentially beyond 120,000 tpa.
- Based on the findings of the HRA for the SWLP, the site is considered unlikely to be suited to the development of any scale of thermal treatment facility.
- Potentially suitable for a range waste management types. However, based on the findings of the HRA for the Plan, the site is considered unlikely to be suited to the development of any scale of thermal treatment facility.
- The allocated site forms part of the wider area covered by the Slyfield Area Regeneration Project<sup>21</sup> (SARP) being led by Guildford Borough Council. To enable the proposed mixed use re-development of the SARP area, the allocated site will enable a new council waste management depot (relocated on site); a new sewage treatment works; and new or enhanced waste management facilities (including a waste transfer station and a community recycling centre). The sites currently occupied by these existing waste uses are considered to form an exception under Policy 7 - Safeguarding of the SWLP under the understanding that equivalent, suitable and appropriate replacement capacity can be provided at the allocated waste management site in advance of non-waste development of these existing sites.
- The site is accessed from the A320 (Woking Road) to the west. The junction of Moorfield Road and the A320 may require improvements.

**Particular area of disagreement** between Surrey County Council and Guildford Borough Council:

- It should be made clear that the site is not suitable for any scale of thermal treatment facility (as appears to be justified by the HRA evidence).

Action being taken to resolve disagreement:

- Surrey County Council to provide further information on the risks associated with thermal treatment or incineration of waste.

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<sup>21</sup> Site Allocation Policy A24 in the emerging Local Plan

### ***Industrial Land Areas of Search***

**Particular area of disagreement** between Surrey County Council and Guildford Borough Council:

- Despite provisions at 5.2.5 above, at the present time Guildford Borough Council, as land owner at Slyfield Industrial Estate, Woodbridge Meadows and land north and south of Lysons Avenue, is not pursuing waste uses on these sites and hence they are not regarded as currently available for this type of use. Guildford Borough Council considers that areas 5, 6 and 8 should be omitted based on landowner intent.

## 6.3 Mole Valley District

### **Allocated site:**

#### ***Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead***

**Particular areas of agreement** between Surrey County Council and Mole Valley District Council:

- Potentially suitable for small, medium and large-scale facility(s) up to and potentially beyond 120,000 tpa.
- A larger scale facility would likely require appropriate improvements to the site access road and improvements at the junction of the A245 Randalls Road and Oaklawn Road.
- Suitable for a range of potential waste management types.
- The site is within the Green Belt. As part of its review of the Green Belt boundary, associated with the review of the Local Plan, Mole Valley District Council agrees to seriously consider the merits of taking the site out of the Green Belt

**Particular area of disagreement** between Surrey County Council and Mole Valley District Council:

- The use of the site for thermal treatment or incineration of waste because of concerns about the effect on public health.

Action being taken to resolve disagreement:

- Surrey County Council to provide further information on the risks associated with thermal treatment or incineration of waste.

### ***Industrial Land Areas of Search:***

**Particular area of disagreement** between Surrey County Council and Mole Valley District Council:

- The potential use of the industrial land area of search for thermal treatment or incineration of waste because of concerns about the effect on public health.

Action being taken to resolve disagreement:

- Surrey County Council to provide further information on the risks associated with thermal treatment or incineration of waste.

## 6.4 Reigate & Banstead Borough

### **Plan Policies: Policy 11a – Strategic Waste Site Allocations**

Point of clarification:

- The Borough Council considers that the land around Earlswood Depot/Waste Transfer Station and the Earlswood Sewage Treatment Works, Redhill is unsuitable for intensification/further waste management activities, especially thermal treatment technologies, particularly due to effects on nearby residents and “in combination” effects with existing waste operations. To this end, the Borough Council supports the conclusions of the County Council’s evidence in respect of these sites and the consequent omission of this site from the submission Plan.

### **Industrial Land Areas of Search**

Point of clarification:

- The Borough Council’s local policies seek to protect the identified ILASs in order to meet the borough’s future need for B use employment premises. Waste uses and related development could be acceptable in these areas provided they support this objective and do not compromise the future attractiveness and operation of ILAS sites for their predominant B use/economic purpose identified in the Local Plan.

## 6.5 Runnymede Borough

### **Allocated site:**

#### **Land adjacent to Trumps Farm, Kitsmead Lane, Longcross**

**Particular area of disagreement** between Surrey County Council and Runnymede Borough Council:

- Runnymede Borough Council do not accept that this site should be allocated in the Plan as it is not considered that the policy is either justified by the evidence, effective or consistent with national planning policy for the following reasons:
  1. It has not been demonstrated that there is a need for the site for the type of waste facility proposed;
  2. It has not been demonstrated that the site is suitable for the use or scale of waste facility proposed and alternative sites are available;
  3. The Policy text is inconsistent with the NPPF and conflicts with other policies in the proposed SWLP.

Action being taken to resolve disagreement:

- Surrey County Council to clarify why this site is so important for development as a facility for the management of Dry Mixed Recycling.

## 6.6 Spelthorne Borough

### **Plan Policies**

**Particular area of disagreement** between Surrey County Council and Spelthorne Borough Council relating to the Policies in the Plan:

- The Borough Council is concerned that, historically, sites in the Green Belt, which have been subject to mineral extraction and restoration, have been used for the co-location of waste facilities and that these activities have either significantly delayed the final restoration or become established and intensified to become permanent waste sites, contrary to the original proposals to restore the site to an open Green Belt use.
- The Borough Council considers that the relevant policies in the plan and the application of these policies should provide greater assurance that demand for waste facilities, particularly in the Green Belt, does not result in the unacceptable extension of minerals and waste operations at a site and delay final restoration to the detriment of amenity or the environment.

Action being taken to resolve disagreement:

- Surrey County Council will respond to these concerns to provide assurances concerning the application of policy.
- A significant proportion of construction and demolition recycling capacity in Surrey has historically been provided by temporary sites at operational mineral workings. The county council will continue to work with Spelthorne Borough Council as a revised Minerals Plan is prepared from late 2019 onwards, at which time future options for providing construction and demolition recycling capacity will be reviewed.

### **Allocated site:**

#### ***Oakleaf Farm, Stanwell Moor***

**Particular areas of agreement** between Surrey County Council and Spelthorne Borough Council:

- Potentially suitable for small, medium and large-scale facility(s) up to and potentially beyond 120,000 tpa and for a range of potential waste management types (but Spelthorne Borough Council do not agree that thermal treatment is suitable – see below) subject to.
  - Greater clarity and detail on the types and scale of future waste operations, particularly thermal treatment.
  - The impact on the openness of the Green Belt and demonstration of very special circumstances.
  - Fully mitigating the impact of any additional HGV traffic on the village of Stanwell Moor through full assessment of potential access improvements.
  - Appropriate Assessment under the Habitat Regulations.

- This site falls within the airport safeguarding zone of Heathrow Airport. There may be height restrictions for development. In addition, if any tall flues or chimneys are proposed an Instrument Flight Procedure (IFP) Assessment may also need to be carried out.

**Particular area of disagreement** between Surrey County Council and Spelthorne Borough Council:

- Definition of the extent of the boundary of the allocation site and its description as previously developed land (PDL).
- Spelthorne Borough Council is concerned at potential harmful impacts to local residents as a direct result of waste management activities and HGV movements.
- Spelthorne Borough Council does not consider the site to be suitable for any form of thermal treatment and requests Surrey County Council removes all reference to thermal treatment of waste at Oakleaf Farm from the Waste Local Plan.

Action being taken to resolve disagreement:

- Surrey County Council to clarify its description of the site as PDL in relation to the activities on the site and the definition of the site boundary.

## 6.7 Surrey Heath Borough

### ***Industrial Land Areas of Search***

Point of clarification:

- Para 7.3 – The Borough Council is not proposing any joint allocations for employment and waste within the Surrey Heath Local Plan. The borough council accept that waste management may be an appropriate use in employment areas but that the proposed use needs to be tested against the policy criteria.

## 6.8 Tandridge District

### **Allocated site:**

#### ***Lambs Business Park, Terra Cotta Road, Tillburstow Hill Road, South Godstone***

**Particular areas of agreement** between Surrey County Council and Tandridge District Council:

- Potentially suitable for small, medium and large-scale facility(s) up to and potentially beyond 120,000 tpa.
- Potentially suitable for a range of waste management types including thermal treatment.
- The site is within the Green Belt but is proposed to be removed through the emerging Tandridge Local Plan.
- As part of this allocation the district council recognises that the county council proposes that part of the site be allocated as suitable for waste management potentially associated with energy recovery.
- Proposals that seek to utilise the existing rail network and siding in order to support sustainable transport patterns will be encouraged.
- In the event that a proposal for the development of a new Energy from Waste plant comes forward in this location, it is agreed that, if practicable, this should be designed to enable the future use of surplus heat to serve the South Godstone Garden Community and the operations of Lambs Business Park.

## 6.9 Woking Borough

### ***Industrial Land Areas of Search***

Point of clarification:

- Policy CS15 (sustainable economic development) of the Woking Core Strategy safeguards land within Byfleet Industrial Estate and Monument Way East Industrial Estate to meet its future need for B Class Uses. This is necessary to enable the delivery of the economic strategy of the Core Strategy. The Council would therefore resist any waste development proposal that would not meet this overall objective and/or undermine the delivery of this objective. The uncertainty embedded in the ILAS policy could be overcome by the Waste Local Plan being specific about the nature and type of waste facilities that could be promoted on the sites.

## 7. Delivery and Governance arrangements for the planning of waste management

- 7.1 The delivery of the SWLP is principally the responsibility of the county council who will guide waste development by the private and public sectors. However, the county council and all eleven district and borough councils are co-operating meaningfully and on an ongoing basis to minimise areas of conflict between the authorities on planning policy concerning waste management.
- 7.2 This Statement of Ground was initiated by the county council and has been prepared following several meetings between officers of Surrey County Council and the district and borough Councils. These meetings were informed by earlier drafts of the Statement of Common Ground. The Duty to Cooperate statement evidences the cooperation that has taken place that has generally been in the form of correspondence and meetings.
- 7.3 Officers of Surrey County Council and the district and borough councils have worked closely<sup>22</sup> to seek common ground between the councils on the strategic matters concerning the management of waste as set out above, having particular regard to:
- Minimising conflict between site allocations and areas of search proposed in the SWLP and policies (including site allocations) in the district and borough councils' adopted, and emerging, Local Plans;
  - working together with district and borough councils to seek joint allocations for employment and waste within the Development Plan, as appropriate. This joint working is intended to result in local plan policy wording that ensures waste management is seen as an appropriate use which supports the delivery of employment alongside B2 and B8 uses and does not conflict with the strategic uses of an area or site;
  - the agreement and implementation of the joint consultation protocol that, amongst other things, addresses safeguarding of waste infrastructure<sup>23</sup>. Following adoption of the SWLP it is agreed that the county council and district and borough councils will work together to update the joint consultation protocol to ensure it reflects the SWLP.
- 7.4 As shown in section 2 above, this SoCG has been agreed by the leaders, or the relevant lead councillors, of the county council and the eleven district and borough councils. There are certain matters which pertain specifically to individual district and borough councils and these are detailed in Section 6.

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<sup>22</sup> See Duty to Cooperate Statement for a full record of engagement

<sup>23</sup> See the [Minerals and Waste Consultation Protocol, 2016](#). This protocol also concerns the safeguarding of on minerals supply facilities and mineral resources.

## 8. Timetable for agreement, review and update

- 8.1 The county council will report the position with respect any SoCGs to which it is a signatory in its Annual Monitoring Report and this will include the need for, and progress with, any reviews. Co-operation between the county council and the district and borough councils will continue and this will involve meetings on a county wide level and on a one to one basis. Activity undertaken to satisfy Duty to Co-operate provisions will be reported in the Authorities' Annual Monitoring Reports.
- 8.2 The county council and the district and borough council planning authorities are all members of the Surrey Planning Officers Association (SPOA) that meets on at least a bi-monthly basis to discuss issues relevant to planning across Surrey quarterly basis. The 'Planning Working Group' (PWG) also exists for planning policy officers from the county council and the district and borough council to discuss and resolve 'cross-Surrey' issues PWG also meets on a bi-monthly basis. These fora will be used a means to disseminate information on this SoCG and in particular the need for, and progress on, any updates. Specific issues relating to this SoCG may be discussed at SPOA and/PWG. Co-operation activity will also be reported in the Authorities' Annual Monitoring Reports.

## Appendix – Relevant Development Plan documents and stages of review

| District/Borough   | Adopted Planning Document  | Stage of review (at March 2019)                        |
|--------------------|--|--|
| Elmbridge          | Core Strategy (2011)<br>Development Management Plan (2015)   | New Local Plan - Strategic Options Consultation (2017) |
| Epsom & Ewell      | Core Strategy (2007)<br>Development Management Policies Document (2015)  | New Local Plan Issues & Options Consultation (2017)    |
| Guildford          | Local Plan (2003)  | Submission Local Plan (2018)                           |
| Mole Valley        | Core Strategy (2009)<br>Local Plan (2000)  | New Local Plan – Evidence gathering (2018)             |
| Reigate & Banstead | Adopted Core Strategy (2014)   | Proposed Submission Plan, Regulation 19 Stage (2018)   |
| Runnymede          | Local Plan (2001)  | Submission Local Plan (2018)                           |
| Spelthorne         | Spelthorne Core Strategy and Policies DPD (2009)<br>Spelthorne Allocations DPD (2009)  | New Local Plan – Issues and Options (2018)             |
| Surrey Heath       | Local Plan (2000)<br>Core Strategy and Development Management Policies (2012)<br>Camberley Town Centre Area Action Plan (2014) | New Local Plan - Issues and Options (2018)             |
| Tandridge          | Core Strategy (2008)   | Local Plan: 2033, (Submission 2019)                    |
| Waverley           | Local Plan (2002)<br>Local Plan Part 1: Strategic Policies and Sites (2018)  | Local Plan Part 2 - Preferred Options (2018)           |
| Woking             | Core Strategy (2012)   | Draft Site Allocations DPD Reg 19 Consultation (2018)  |