

KEITH TAYLOR
Green Party
for the South East of England



Waste Plan Consultation team
Surrey County Council
Penrhyn Road, Kingston upon Thames
Surrey
KT1 2DW

12 January 2018

Dear Surrey County Council,

Re: Surrey Waste Local Plan Consultation

On December 15th 2017 I sent in a letter expressing concerns about the lack of transparency in the Waste Plan consultation. I do appreciate Mr Sanderson's detailed response to my letter, received on 8 January 2018, and that he has forwarded a copy to the Cabinet Member for Environment and Transport Mike Goodman and the Waste Member Reference Group. However, severe concerns both about the consultation process and the Waste Plan itself remain and therefore I would like to ask you to consider the substantive points below in addition to my original letter dated 15 December 2017

The consultation lacks transparency and makes it difficult for laypeople to engage with it.

Aim of the Plan

I support the overall direction of the Waste Plan: "It is important that Surrey's waste is managed sustainably and this includes the county working towards sending zero waste to landfill". I would suggest that this should be revised to an overall "zero waste" strategy, even if this falls outside the time scale for the Plan.

I also support these objectives: "To encourage residents and businesses to produce less waste and re-use, recycle and recover more waste. To recognise the value of Surrey's environment and maintain the high standards of wellbeing enjoyed by our residents when permitting waste facilities".

However I do not consider that the Plan recognises the value of Surrey's environment, by its emphasis on incineration, nor on the wellbeing of residents.

Nor does the Plan provide sufficient emphasis on the overall reduction of waste and investment in recycling and reuse. Indeed it appears to divert attention and investment into incineration, and away from strategies which are sustainable, lower impact in terms of carbon emissions and the take of Green Belt land, and in terms of greatly increased impacts on a small number of local communities.

The Waste Plan prioritises incineration over other means of waste management and reduction making it impossible to achieve a zero waste outcome in the medium/long term.

Overstatement of the need for incineration

It is unclear from the Plan – yet this must be predictable – the true intent of the incineration programme contained in it. The indication is for 3-6 incinerators across Surrey, drawing in waste from outside the county to make them economically and operationally viable: "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”.

This relies on an apparent over estimate of the need for waste management which Cllr Jonathan Essex’s response sets out in more detail. He has questioned the housing figures in the Waste Plan (which are greater than other plans) and the Plan being based on a worst case scenario, rather than what is more likely to happen. There is also over capacity in incineration in the South East already. Taking a South East approach is therefore important. Recycling will not grow above 63% UK wide if all the current waste treatment capacity is used.

Establishing a capital programme of investment in incineration depends on a reliable supply of raw materials to feed the plants in future. According to figures in the response from Cllr Jonathan Essex, there is enough residual waste in Surrey to supply just over one incinerator during the life time of the Plan. By building even one more incinerator, the “need” for residual waste becomes embedded into plans over the 25 year life time of the plant. Clearly planning for 3-6 energy from waste facilities increases this demand substantially. This emphasis reduces the investment potential for other solutions and strategies and makes incineration a “one size fits all solution” at considerable expense to the public purse (including the cost of managing the building of new incinerators in the face of a high level of public dissent). Attention will be diverted from waste reduction, recycling, reuse, anaerobic digestion, composting and other more creative solutions which could lead us toward a “zero waste” outcome by 2050, if not sooner. The focus on incineration will kill off those good intentions.

Increasing landfill capacity would be preferable to this medium/long term commitment to incineration and would be more consistent with the Waste Hierarchy in the Waste Framework Directive (2008/98/EC) than what is currently being proposed. This is manageable and reversible in a way that establishing an incineration programme is not.

Surrey does not need to expand its Energy from Waste capacity.

The impacts of incineration

These are set out in the consultation paperwork under the Energy from Waste section which explains (in a generic way) what the different energy strategies involve. The impacts feature increased CO₂, particulates, heavy metal and acid emissions; a huge amount of HGV movements; significant visual impact due to the large size of the facilities; noise, dust and odour. The response of Cllr Jonathan Essex spells out the impacts – particularly in terms of carbon emissions – in more detail. These kinds of impacts provide a powerful argument against incineration both as a matter of principle for a county council committed to reducing carbon emissions (in its Carbon and Energy Policy 2015-19) and in terms of the issues that local residents would object to at a later stage when the plans become clearer. As discussed below and in my original letter, it is difficult for residents to object now as the specific plans for the individual sites are not included in the Waste Plan so residents may overlook the fact that an incinerator might be built in their area.

The impacts of new incineration are unacceptable as well as unnecessary.

The sites for incineration

Currently Surrey has one incinerator coming on stream (in Shepperton) and others have been strenuously resisted by local communities. If the consultation was honest in its approach it would indicate for all the nine sites, which are named on the consultation documents online, that any of these could be earmarked for

an incinerator. And it would ask what residents thought about that. Indeed it would have a section indicating what each individual site had planned for it. But the Plan is silent on that.

Residents might tolerate a plan for a site near them if it was for improved recycling, or composting. They might object strongly if the plan was for a large plant, 25 years of 150 HGV movements a day and chimney emissions. As the process is structured, the opportunity to object to those impacts is now. As the Plan is unclear about the intended use of the individual sites it can only be assumed that all these impacts could be felt at any of the nine sites listed. This is unclear in the consultation.

Nine sites are threatened with incinerators without local residents being given the information they need to assess the impacts.

Green Belt

All the sites on the list are partly or wholly in the Green Belt or adjacent to it. The Waste Plan makes a case for “very special circumstances” to be applied to the proposals for waste management facilities: “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”.

This will make it harder for individual objections to be raised later in the process. As waste management facilities vary so widely in their scale and impacts, how the local community might view them and the need for them, the Plan should adopt an individual site approach. If the Plan could be clear about what is planned for each individual site at this stage, a more general statement might be applicable. But in the absence of that, the Plan risks undermining the democratic nature of the planning system. It will leave residents able to object to the detail, but not the principle of a waste management facility proposal at a later stage. “Very special circumstances” cannot be applied as a blanket term to any waste management facility to come forward under the Waste Plan.

Surrey is already under pressure from development of many kinds in the Green Belt. The principle of the Green Belt is being tested as never before. The county council must be very careful not to undermine the protection afforded to the Green Belt in law and the support for that principle from people living in Surrey.

Establishing a blanket special case for waste management facilities on Green Belt in Surrey is not acceptable or needed.

The alternatives to incineration

I do not support the inclusion in the Waste Plan of any increase in incineration. There are alternatives and Surrey is already in the lead in England in implementing them.

The Waste Plan should adopt a target of 85% recycling/reuse by 2033. In order to do this the Plan needs to increase recycling capacity and not incineration. This is attainable and Cllr Essex’s response has set out how residual waste might be minimised and eventually eradicated (some within the gift of Surrey County Council and some not). For example:

- Anaerobic digestion at all sewage plants
- Standardisation of the recycling approach across the county
- Better separation of materials
- Better education of local residents and systems that make recycling easier
- Maximise opening hours of recycling centres and the range of what they take
- Introduction of a deposit refund scheme for certain materials

- Waste reduction (eg the widening of the carrier bag charge and introduction of throwaway cup/plastic bottle tax or other incentives)

The advantage of this approach is that it would potentially create over 7000 jobs and equip Surrey's work force with new skills and intelligence in staying at the forefront of waste solutions.

Recycling targets should be increased and strategies for improving capacity for recycling and waste reduction prioritised in the Waste Plan.

Yours sincerely,

A handwritten signature in black ink that reads "Keith Taylor". The signature is written in a cursive style with a long horizontal stroke underneath the name.

Keith Taylor, Green MEP, South East England.