

# Surrey Waste Plan Submission Stage Representation Form

The consultation runs from 30 June to 18 August 2006.



Please read the accompanying notes for more details and explanation about this process. We also encourage you to go to the website <http://www.surreycc.gov.uk/wasteplan> for further information and to access the online consultation system, which many people will find more user-friendly than the paper version.

## Section A: Contact details

Title MR First name PAUL  
Last name UTTLEY  
Organisation HORSELL COMMON PRESERVATION SOCIETY  
(where applicable)  
Address  
PO BOX 53  
WOKING, SURREY  
Postcode GU21 4YU  
Telephone \_\_\_\_\_  
Email \_\_\_\_\_  
Reference ID 22827  
(if known)

Name of person or organisation on whose behalf this representation is being made if different from above

Signature

Number of representation sheets enclosed with form (Please see Section D for further information)

5

## Section B: Data protection & future correspondence

Surrey County Council is working with Dialogue by Design, an independent consultation company, to conduct this survey. Any personal information you provide will be processed by Surrey County Council and Dialogue by Design, in accordance with the Data Protection Act 1998, to assist in the preparation of the Surrey Minerals and Waste Development Framework and related minerals and waste planning issues. We cannot make use of responses which are given to us confidentially as the public have a right to examine representations made.

Please notify me when the report of the Inspector appointed to carry out the examination of the Surrey Waste Plan is published

Please notify me of the adoption of the Surrey Waste Plan

Please do not contact me in future for further consultation on the Surrey Waste Plan.

## Section C: Overall soundness of Surrey Waste Plan

Please mark, like this  whether you consider the Surrey Waste Plan to be sound or unsound:

Sound (You can briefly describe why below. You DO NOT need to complete Section D to F, please return forms to the freepost address)

Unsound (Please go to Section D to continue filling in the form)

## Section D: How to challenge the Surrey Waste Plan against the Tests of Soundness

Please only continue to fill in this form if you consider the Surrey Waste Plan to be unsound (as identified in Section C).

If you consider a policy, paragraph or proposals map to be unsound, you must challenge it against one of the nine tests of soundness (outlined in detail in the Accompanying Notes), using the representation sheets.

Three representation sheets have been provided for you to challenge as to why a policy, paragraph or proposals map does not meet one of the nine tests of soundness. Please note that you should fill in a separate representation sheet for EACH paragraph, policy or proposals map and for EACH test of soundness you are challenging the paragraph, policy or proposals map against.

For example, if you wish to challenge paragraph A11 against tests of soundness, 3, 4 and 8 you will need to fill in three separate representation forms. If you require more than three sheets, please photocopy additional representation sheets as clearly as possible and attach them to the representation form before returning to the freepost address. We encourage you to write the number of representation sheets enclosed with the form, in the relevant box in Section A, to ensure that we have a complete record of your submission.

Please note representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues identified for examination.

Please return this form and representation sheets to:  
Surrey Waste Plan, Freepost SEA12430, Thornton Heath, CR7 7XT  
(no stamp required)

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**Section E: Representation sheets**

**Please clearly state which SINGLE paragraph, policy or proposals map your representation relates to:**  
(Remember, if you wish to challenge numerous paragraphs, policies or proposals maps, you MUST complete a separate representations form for EACH individual paragraph, policy or proposals map and EACH test of soundness you are challenging the paragraph, policy or proposals map against).

**Paragraph**

(Choose one, e.g. A2, C14, D11)

C12

or

**Policy**

(Choose one, e.g. CW1, WD7, DC2)

or

**Proposals Map**

(Choose one, e.g. Godstone Depot, Copyhold Works)

**Please clearly identify which ONE of the nine tests of soundness you are challenging the above paragraph, policy or proposals map against**

(Choose one, e.g. Test 2, Test 8)

7

**Give details, below, of what change(s) you consider necessary to make the paragraph, policy or proposals map, in the Surrey Waste Plan, sound.**

The justification and the general reference to sites fails to create certainty to communities, as the process that will be undertaken on these sites is uncertain. This demonstrates the lack of a clear and coherent strategy of analysing the waste stream, i.e. the type of waste and where it is generated in geographic terms, the processes required to deal with the recycling or disposal of waste, the most effective process and an analysis of the sites constraints and its ability house certain processes.

Clearer reference needs to be made to the criteria for development set out within the Proposals Maps and these should be reflected as constraints to be addressed (see comments on Proposals Maps). Clear reference should also be made within the justification to which development control notes/policies are applicable within the waste plan i.e. CW6, CW7, DC2 and DC3.

**Section F: Independent examination**

This representation will be read and considered by the Inspector, who will determine the most appropriate procedure for the public examination.

Do you wish to appear in person at the examination?

Yes  No

Please attach this representation sheet to the form and return to:  
**Surrey Waste Plan, Freepost SEA12430, Thornton Heath, CR7 7XT**  
(no stamp required)

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## Section E: Representation sheets

Please clearly state which SINGLE paragraph, policy or proposals map your representation relates to:

(Remember, if you wish to challenge numerous paragraphs, policies or proposals maps, you MUST complete a separate representations form for EACH individual paragraph, policy or proposals map and EACH test of soundness you are challenging the paragraph, policy or proposals map against).

**Paragraph**

(Choose one, e.g. A2, C14, D11)

or

**Policy**

(Choose one, e.g. CW1, WD7, DC2)

WD 2

or

**Proposals Map**

(Choose one, e.g. Godstone Depot, Copyhold Works)

Please clearly identify which ONE of the nine tests of soundness you are challenging the above paragraph, policy or proposals map against

(Choose one, e.g. Test 2, Test 8)

7

Give details, below, of what change(s) you consider necessary to make the paragraph, policy or proposals map, in the Surrey Waste Plan, sound.

The policy is too general and refers to a wide range of waste processes including recycling storage, transfer, materials recovery and processing facilities without any regard to site specific constraints

As with the justification the policy does not create certainty, it fails to identify which processes are suitable for which sites. This demonstrates the lack of a clear and coherent strategy of analysing the waste stream, i.e. the type of waste and where it is generated in geographic terms, the processes required to deal with the recycling or disposal of waste, the most effective process and an analysis of the sites constraints and its ability to house certain processes. It fails to adequately match the sites to specific processes.

The current approach as it appears to be one of simply identifying as many sites as possible and then seeing what you can get on the site

If the policy is not to be re-written, then in respect of the reference to the Proposals Maps a stronger statement is needed. The part of the sentence which reads '*meets the key development criteria set out at the Proposals Maps;*' should be changed to read '*demonstrates that it has clearly addressed all the key development constraints set out at the Proposals Maps;*'

Criteria (iii) only makes reference to Policy CW6 which deals with development within the Green Belt. The policy also needs to make reference to Policies CW7, DC2 and DC3.

## Section F: Independent examination

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Yes  No

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## Section E: Representation sheets

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(Remember, if you wish to challenge numerous paragraphs, policies or proposals maps, you **MUST** complete a separate representations form for EACH individual paragraph, policy or proposals map and EACH test of soundness you are challenging the paragraph, policy or proposals map against).

**Paragraph**

(Choose one, e.g. A2, C14, D11)

or

**Policy**

(Choose one, e.g. CW1, WD7, DC2)

or

**Proposals Map**

(Choose one, e.g. Godstone Depot, Copyhold Works)

ALL

**Please clearly identify which ONE of the nine tests of soundness you are challenging the above paragraph, policy or proposals map against**

(Choose one, e.g. Test 2, Test 8)

7

**Give details, below, of what change(s) you consider necessary to make the paragraph, policy or proposals map, in the Surrey Waste Plan, sound.**

The text needs to be clearer and more specific as to which processes are suitable for which sites. This needs to be analysed having regard to; in order:

- The sites constraints
- The level of waste produced within the geographic location
- The type of waste produced within the geographic location
- The best and most environmentally effective way of dealing with the waste.

The wording 'Key Development Criteria' does not portray the message that these are the sites key constraints that need to be clearly addressed. Accordingly, the wording should be changed to 'Key Constraints'

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**Paragraph**

(Choose one, e.g. A2, C14, D11)

C 27

or

**Policy**

(Choose one, e.g. CW1, WD7, DC2)

or

**Proposals Map**

(Choose one, e.g. Godstone Depot, Copyhold Works)

Please clearly identify which ONE of the nine tests of soundness you are challenging the above paragraph, policy or proposals map against

(Choose one, e.g. Test 2, Test 8)

7

Give details, below, of what change(s) you consider necessary to make the paragraph, policy or proposals map, in the Surrey Waste Plan, sound.

Whilst the justification refers to Woking Borough Council's plans it just sets out the sequence of events to the possible use of Heather Farm for thermal treatment and not the appropriateness of a thermal treatment facility on this site or the environmental constraints that would need to be overcome.

It fails to point out the sensitive nature of the land surrounding the farm and that fact that detailed consideration will need to be given to and demonstrated that all key constraints are addressed.

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**Paragraph**

(Choose one, e.g. A2, C14, D11)

or

**Policy**

(Choose one, e.g. CW1, WD7, DC2)

WDS

or

**Proposals Map**

(Choose one, e.g. Godstone Depot, Copyhold Works)

**Please clearly identify which ONE of the nine tests of soundness you are challenging the above paragraph, policy or proposals map against**

(Choose one, e.g. Test 2, Test 8)

7

**Give details, below, of what change(s) you consider necessary to make the paragraph, policy or proposals map, in the Surrey Waste Plan, sound.**

The policy is general and encompasses all types of thermal treatment of waste, which could include Mass Burn Incineration that would deal with waste from a very wide area rather than smaller advanced facilities that would deal with waste generated within the immediate geographic location.

Policy WD5 as with WD2 appears to be a 'scattergun' approach to the identification of waste facilities or a 'see which one we get lucky on approach'. This is reflected in the fact that two potential sites for thermal treatment have been selected in close proximity without any consideration to the level and type of waste being produced and the proximity principle. In this respect it needs to be re-thought.

If the policy is not to be re-written, then in respect of the reference to the Proposals Maps a stronger statement is needed. The part of the sentence which reads '*meets the key development criteria set out at the Proposals Maps;*' should be changed to read '*demonstrates that it has clearly addressed all the key development constraints set out at the Proposals Maps;*'

Criteria (iv) only makes reference to Policy CW6 which deals with development within the Green Belt. The policy also needs to make reference to Policies CW7, DC2 and DC3.

## Section F: Independent examination

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Yes  No

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