**Matter 5: Allocations and ILAS**

**Policy 11a – Strategic Waste Site Allocations**

*Site B(iii) – Oakleaf Farm, Horton Road, Stanwell Moor (Part 2 Allocation 5.4)*

101) Does the site description and indicative area shown in Part 2 accurately reflect the current extent and characteristics of the site, including the MRF building and the bund around the wider site? For clarity and effectiveness, should the description and indicative site area be amended to include these elements?

The site description as given in the allocation is correct in terms of the current operations at the site however clarification of the site plan accompanying this is required. The site boundary, as shown on the map, does not include the Materials Recovery Facility (MRF) building to the south east of the site which was granted permission as part of the waste operations at the site (ref: SP08/0992). For reference, the site layout plan for the consent has been included as Appendix 1 to the hearing statement which shows the extent of the site. This permission established the waste processing at the site and the MRF building is an important element of the use. Paragraph 4.3.2.1\(^1\) of the spatial strategy states sites are allocated where it is considered suitable in principle for the development of additional waste management facilities. The MRF building, whilst in use and meeting current needs, could have the potential to provide for additional facilities if considered appropriate, subject to planning permission. By not including the building within the site allocation boundary there is the potential that this part of the site could be sterilised. The spatial strategy\(^2\) itself notes that redevelopment of suitable sites in existing waste management use is encouraged. On this basis, there would seem to be no reason for the MRF building to not be included as part of the allocation within the SWLP. If it were excluded, then it would raise the issue of whether Oakleaf Farm needs to be allocated within the SWLP at all, given that it has permission and is in current use as a waste site. Spelthorne would wish to see the reasoning behind not including the MRF building as part of the allocation and whether, as a result, the site should be included as an allocation within the SWLP.

Under the original permission for the site, granted on appeal (ref: SP95/0174), the use of the site was for a temporary period of 10 years with a condition that the bunds were to be removed at the end of this period to allow for the site’s restoration. The permission for the permanent use of the site granted in 2009 (ref: SP08/0992), included the construction of the landscape bunds. The bund is a significant feature in providing landscaping and minimising visual impact of the site for surrounding properties. The inclusion of the bunds in the subsequent permission continued to affect openness of the Green Belt.

The current waste operations occur within the bunded area and it would be reasonable to expect that any additional waste facilities proposed for the site would also be included within this area to allow it to be considered suitable. On this basis, reference should be made to the bund within the allocation such is the important role it plays in enclosing the site and reference should also be made to the fact that waste operations both current and future will occur within this bund. This is in the interest of maintaining the clearly defined boundary within the Green Belt and protecting neighbouring properties and other visual receptors.

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\(^1\) Page 35 of Part 1 – Policies Submission Plan
\(^2\) Page 34 of Part 1 – Policies Submission Plan
102) The key development issues for the site, identified within Part 2 of the SWLP, include European sites (SPA, Ramsar site, SAC), SSSI and two sites of nature conservation importance. How have the impacts of the proposed allocation on these sites been assessed? Are the findings of this assessment clear and robust? Do they support the allocation of the site?

Oakleaf Farm’s proximity to designated sites make the current and any future uses sensitive to the surrounding area. The South West London Waterbodies SPA is designated primarily on the basis of the presence of gadwall and northern shoveler and, as a designated Ramsar site, is of international importance.

The Air Quality Impact Assessment (AQIA) details comparables in terms of proxy waste management facilities where similar thermal treatment plants are utilised. For Oakleaf Farm, the AQIA in table 5.47 colour codes the pollutant count where it demonstrates that the Hooton Gasification plant is classified as high and this is also the same in table 5.48 for the ecological receptor impact. The AQIA on page 97 indicates that the South West London Waterbodies SPA experiences the highest process contributions (PC) from the Oakleaf Farm site and that the Hooton Gasification scenario would have the greatest impact and therefore would be least desirable for the ecological impacts this would likely have. However this does not appear to have been reflected within the allocation for Oakleaf Farm with the site being considered suitable for a full range of potential waste management facilities. It would be hard to justify this on the basis of the significant impact on the SPA that the full range of facilities are suitable. The Hooton Gasification facility is at the higher end of throughput at 284,000 tpa. With regards to Oakleaf Farm, a facility of a similar function and throughput to the Hooton Gasification site would represent a substantial increase of the existing site and, as shown by the tables 5.47 and 5.48, would have significantly high impacts which would make it unsuitable. Spelthorne Council would like to see the allocation amended as the site is not considered suitable for the full range of waste management facilities.

The allocation makes reference that the site may be suitable for a small, medium or large-scale thermal treatment facility. This reference is prescriptive and does not make clear the type of thermal treatment that could be considered. The inclusion of the word ‘may’ shows that there is some uncertainty about this and therefore brings in unnecessary ambiguity. At this stage of submission, more certainty is required in order for thermal treatment to be included as part of the allocation. It should also be noted that reference to thermal treatment has not been included in previous draft versions of the plan. Spelthorne Council would therefore wish to see the removal of reference to thermal treatment from the allocation due to the lack of evidence demonstrating its suitability.

Appendix B to the HRA report states in part B – 1 that Oakleaf Farm is less suited to the development of a large scale thermal treatment facility unless demonstrated through Appropriate Assessment (AA). However the AA has not been carried out for the site and as a result there is no clear evidence to suggest that a large scale thermal treatment plant would be suitable. Its inclusion within the type of facilities in the allocation is therefore incorrect at this point. Whilst it is acknowledged that the inclusion of the footnote in the allocation refers to thermal treatment facility being subject to AA, its inclusion within the allocation is presumptive. Without the requisite

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3 Page 47 of the Air Quality Impact Assessment produced by Aecom
4 Page 94 of the AQIA
5 Page 1 of Appendix B to the Habitat Regulations Assessment Report
evidence to show that the impacts would not be considered harmful, reference to this should be removed. Appendix B\textsuperscript{6} refers to the impacts measured against the Windsor Forest and Great Park SAC however there appears to be no detail regarding the impacts when against the South West London Waterbodies SPA. Para 1.6 of the HRA report\textsuperscript{7} states that it is necessary to consider all SPAs, SACs and Ramsar sites however reference to the Waterbodies SPA is missing from Appendix B. Spelthorne Council would like to understand why this is the case and if such work still needs to be undertaken.

With the absence of an Appropriate Assessment and all necessary associated work having been carried out the impacts of the proposed allocation at Oakleaf Farm have not been fully assessed. In this respect, this links with Q12 in Matter 1 in that the requirements of the Habitats Regulations have not been fully met. It is imperative that the AA be done so as to allow the decision-maker to take decisions on further development with regards to the site. It would be presumptive to indicate in the allocation that the site may be suitable for thermal treatment. Until sufficient work has been done to show that the type and scale facility of such would be suitable then it should be assumed that this would not be the case.

\textsuperscript{6} Page 29 Appendix B to the Habitat Regulations Assessment Report
\textsuperscript{7} Page 3 of the Habitat Regulations Assessment Report
103) How has the proposed allocation considered the potential for cumulative impacts, including in relation to traffic movements and air quality, associated with the proposed development of the waste management facility, together with development nearby?

Spelthorne BC is concerned about the potential cumulative impacts of additional HGV movements were the site to be more intensely developed. There are existing issues associated with the current use of the site which affect Stanwell Moor village. In order to minimise these impacts, there is a current restriction in place which prevents HGVs from turning left out of Oakleaf Farm towards Stanwell Moor. Paragraph 8.1.6 in the Transport Study acknowledges that there have been occasions where HGVs have made U-turns in Stanwell Moor Village and this has been periodically reported to SCC. The issue of HGV movements is an important one locally and Spelthorne BC considers that it is an essential requirement of the allocation of the site in the SWLP that full consideration is given to these traffic movements and their impacts. The Transport Study in para 8.2.9 states that the impact of the increases in vehicles movements resulting from all facility types on Horton Road is considerable. From the study it can be seen that in most cases, the number of HGVs on Horton Road will at least double. This is a significant increase in use of a local road leading to Stanwell Moor village.

The Transport Study in para 8.5.3 summarises that a medium sized facility (with capacity up to 120,000 tpa) could be accommodated at Oakleaf Farm. This is reflected in the allocation of Oakleaf Farm in the allocated sites document. However the allocation further states the implementation of suitable mitigation may allow for a larger facility to be accommodated by allowing all movements at the Horton Road/Stanwell Moor junction. Spelthorne BC would seek clarification that this would not impact upon the current restrictions regarding not turning out left onto Horton Road. The retention of this restriction is necessary to protect the integrity of Stanwell Moor village. There is no additional information provided as part of the transport study to show details of the mitigation that could allow for a larger facility. Given that reference to a larger facility has been made in the allocation, supporting details outlining the mitigation is a necessity. Without this, there is limited justification for the inclusion of a larger facility and therefore this should be removed.

The allocation notes that the site is part of the Air Quality Management Area (AQMA). Oakleaf Farm has a number of receptors in the form of dwellings within 500 metres of the site on Horton Road, Hithermoor Road and at Gibson Place. In addition, Oakleaf Farm is immediately north of King George VI reservoir which is a designated Special Protection Area (SPA) as part of the South West London Waterbodies and is a Site of Special Scientific Interest (SSSI). The site is also within close proximity of Staines Moor SSSI. In the Assessment for the Natural Environment in Part C8.A of appendix C to the Environmental and Sustainability Report, this identifies that the site is classed as being of ‘high’ sensitivity for potential impacts on ecological sites and biodiversity. It is also noted that facilities making use of thermal treatment or energy generation would be considered to be of potential ‘high’ significance. The allocation however states the site to be suitable for a full range of potential waste management facilities. There has been insufficient work carried out with regard to an Appropriate Assessment (AA) to fully explore the potential impacts of the full range of waste.

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8 Page 44 of the Waste Local Plan – Transport Study
9 Page 45 of the Waste Local Plan – Transport Study
10 Page 47 of the Waste Local Plan – Transport Study
11 Page 63 of Part 2-Sites and areas of search
12 Page 447 of Appendix C to the Environmental and Sustainability Report
management facilities and therefore it is difficult at this point to see how such a conclusion can be reached. The cumulative impacts from site traffic and air quality from intensification of the site have not been fully considered both in terms of impacts on human receptors in close proximity to the site or the impact on the ecological sites adjacent to Oakleaf Farm. On this basis, Spelthorne BC cannot see how the site can be considered suitable for a full range of waste management facilities and for a thermal treatment facility of any scale as stated in the allocation. Reference to both of these should therefore be removed from the allocation.
106) A number of potential constraints have been identified for the proposed allocation in Part 2 of the SWLP. Is there a reasonable prospect that these constraints are capable of resolution?

The identification of Oakleaf Farm for waste development is consistent with its current use however there are a number of issues which need to be sufficiently clarified in regard to the possible future uses of the site. The SWLP lists the key development issues as part of the site allocation. The prime issues concern the Green Belt designation and the transport implications of a potential greater level of development.

The site is within Green Belt and the area has been assessed as performing moderately against the five purposes of Green Belt in Spelthorne BC’s Green Belt Assessment Stage 1. As a result, it has been determined that the Council have no proposals for the removal of the site from the Green Belt. Therefore any subsequent proposals for further waste development will be subject to the need to demonstrate very special circumstances.

The current transport arrangements at the site are a limiting factor to being able to support a larger facility. There is an absence of detail on this point and it would not appear that sufficient work has been done to show that such a facility can be accommodated and this constraint overcome.

13 Page 63 of Part 2 – sites and areas of search