Please note:
- All participants are encouraged to familiarise themselves with the hearing statements (and any additional evidence) produced by the Council and other parties in respect of the matters addressed at this session. These are available on the examination website.
- Most references to questions refer to those posed by the Inspector in the schedule of Matters, Issues and Questions.
- The discussion will focus on those questions highlighted in bold.
- The hearing will run until around 17:00, with breaks mid-morning, mid-afternoon and for lunch.

Inspector’s opening

Council’s opening statement

Matter 5: Allocations and ILAS (Policies 10, 11a, 11b, 12)

Issue: Whether the Industrial Land Areas of Search (ILAS) and the allocations are soundly based and provide sufficient flexibility to meet the identified needs of the area for the management of waste?

Policy 10 – Areas suitable for development of waste management facilities

71. Does Policy 10 clearly identify the hierarchical preference for the location of new facilities? Does the policy clearly indicate a preference for development on sites outside the Green Belt, including allocated sites?

72. Given that allocated sites within the Green Belt would not be preferred to other suitable sites outside the Green Belt that may come forward in the future, what is the purpose of the proposed allocations and how effective would they be in delivering the required capacity for waste management facilities?
73. For clarity and effectiveness, should Policy 10, or the related supporting text, include explicit reference to the need for proposals to comply with other policies of the SWLP, including Policy 1 and Policy 14?

74. Does the evidence demonstrate that the land identified in Policy 10 would provide sufficient opportunity to meet the identified capacity requirement for waste management provision? If so, is this clearly identified within the SWLP? What constraints have been identified to the deliverability of proposed provision? Are these constraints capable of resolution?
   - **Would the extent of land identified represent an over-provision?** If so, how would the policies of the plan enable the development of waste facilities to be managed, to ensure that excessive or unnecessary development did not occur?
   - **How were the known constraints identified and assessed?**

*Policy 10, Policy 11a – Strategic Waste Allocations, and Policy 11b – Allocation of a Site for a Household Waste Materials Recycling Facility*

75. Does the SWLP clearly identify the type or types of waste management facility that would be appropriately located on the proposed allocations or ILAS? Does the SWLP include details of the capacity of proposed future strategic waste allocations?
   - **How does this approach relate to the advice in the PPG, where it indicates that the Plan should identify the type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area?** (PPG ID: 28-019-20141016)

76. Does the evidence clearly demonstrate how the ILAS and proposed allocated sites were selected? Is this selection process open and transparent? Is the choice of sites and the ILAS justified, including in relation to the proximity principle?
   - **This issue to be discussed on Day 6, in relation to Q11, Matter 1.**

77. Would the sites identified and the ILAS be effective in meeting the identified waste capacity needs? Does the evidence demonstrate that the sites are deliverable? Are they available, suitable and achievable? Is there clear landowner support for the allocation or ILAS identification? Do the sites have operator involvement?
   - **ILAS 4.15 Byfleet Road Employment Allocation:** having regard to the identified risk of flooding, would the area be reasonably likely to be able to accommodate the quantum of development proposed within Flood Zone 1?
   - **How have the sites and areas identified been assessed as likely to be deliverable?** Does the evidence demonstrate that they are they available, suitable and achievable?
- Having regard to the SOCG-01, the landowner has provided a clear intention not to pursue waste uses on sites within the proposed ILAS 4.5, 4.6 and 4.8? In the absence of landowner support, is the proposed allocation of these areas justified and effective?
- What sites have operator involvement?
- Where the need for mitigation has been identified, how will the mitigation be delivered?

**ILAS**

78. The findings of the Delivery of Waste Management Capacity in Surrey 2008-2017 (SWLP 11) indicate limited capacity for industrial estates and other industrial and employment land to deliver waste management infrastructure (3% of capacity). Given these findings, why does the Council consider the ILAS to be a robust and effective delivery mechanism for new waste management infrastructure?

- Would the delivery of waste management infrastructure to meet identified needs be dependent on development within ILAS coming forward during the plan period?

79. How has the issue of potential for conversion of industrial units to residential use under The Town and Country Planning (General Permitted Development) (England) Order 2015 been assessed? What effect will this have on the potential distribution of development?

80. The key environmental sensitivities for proposed ILAS do not include considerations such as noise and odour. Have these aspects been considered? Is the Council satisfied that such potential constraints would not prevent delivery of waste management facilities on the site?

- Does the Council’s document Management of Impacts on Human Communities Arising from Waste Management (ED-01) satisfactorily address this issue?

81. ILAS 4.1 Brooklands Industrial Park, Wintersells Road Industrial Park and Byfleet Industrial Estate: is the description of the location of the site in relation to the M25 motorway correct? The column identifying current uses refers only to Area A, is this correct?

- Would the Council’s proposed modification AM29 satisfactorily address this issue?

82. ILAS 4.7 Land at Burnt Common warehouse, London Road, Send: the description refers to the emerging Guildford Local Plan. Are any changes required to the description, or the proposed identification of the site as an ILAS, following the recent adoption of this plan?

- Would the Council’s proposed modification AM32 satisfactorily address this issue?
Allocations

Policy 11a – Strategic Waste Allocations

83. Four of the proposed site allocations are within 250 metres of housing. Does the evidence demonstrate that these proposed allocations are justified and reasonably likely to be effective in delivering the facilities required, having regard to Policy 14 and the need for proposals to avoid significant adverse impacts on communities and the environments?

- **Having regard to the conclusions of the Health Impact Assessment, how has the extent of mitigation likely to be required to address the identified potential risks to health and wellbeing been considered in relation to the proposed site allocations? Would the provision of this mitigation be feasible and viable?**

Site A(i) - Land to the north east of Slyfield Industrial Estate, Guildford (Part 2 Allocation 5.1)

84. Evidence indicates that the site is largely required for the relocation of the existing Guildford STW and other existing waste facilities. To be effective and positively prepared, should clarification be provided in Policy 11a to this effect? Without such clarification, would there be an inconsistency with the current reference in the policy, to meeting identified shortfalls in waste management capacity?

- **Would the policy be unambiguous? Would it be evident how a decision maker should react to development proposals? (NPPF, paragraph 16)**

85. The key development issues for the site, identified within Part 2 of the SWLP, include European sites (Special Protection Area, Special Area of Conservation), a Site of Special Scientific Interest, a site of nature conservation importance, a local nature reserve, ancient woodland and the potential for hosting reptiles. How have the impacts of the proposed allocation on these sites and protected species been assessed? Are the findings of this assessment clear and robust? Do they support the allocation of the site?

- **Would proposed Policy 14 of the SWLP enable the effective mitigation of potential adverse impacts on habitats and species? Would the extent of mitigation likely to be required be feasible and viable?**

86. 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 other development nearby?
• Is it considered reasonably likely that potential adverse cumulative impacts would be capable of being satisfactorily addressed?

87. How have the potential transport impacts of the proposed allocation been assessed, including cumulative impacts of this proposal and other proposed development nearby? Would the development of the proposed allocation have a significant adverse impact on the safety and capacity of the local and strategic highway network? What improvements to the highway network would be required to support a medium-large scale facility?

88. Is the Council confident that the development of the site would be able to meet the requirements of Policy 14 of the SWLP, including in relation to potential impacts on the environment and local communities, such as those relating to flood risk and contamination? How has this been assessed?

89. 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?

• Does the SWLP identify how the potential constraints may be overcome?
• Does the evidence base justify the allocation of the site?

Afternoon Session

Site B(ii) – Former Weylands sewage treatment works, Walton-on-Thames (Part 2 Allocation 5.2)

90. Evidence from a representor suggests that the site is unlikely to come forward for development. How has the likely availability of the site been assessed? If the site is unlikely to be available, is the allocation justified and how effective is it likely to be in addressing the capacity needs identified?

• Given the planning history of the site, is there a reasonable prospect that the site will come forward for development during the plan period?
• If not, is the proposed allocation justified and likely to be effective?

91. The key development issues for the site, identified within Part 2 of the SWLP, include European sites (Special Protection Areas, Special Areas of Conservation, Ramsar site), a Site of Special Scientific Interest, a site of nature conservation importance, and a local nature reserve. 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?
92. 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 other development nearby?
   - **Is this assessment sufficiently thorough and are the conclusions robust?**
   - **Is it considered reasonably likely that potential adverse cumulative impacts would be capable of being satisfactorily addressed?**

93. How have the potential transport impacts of the proposed allocation been assessed, including cumulative impacts of this proposal and other proposed development nearby? Would the development of the proposed allocation have a significant adverse impact on the safety and capacity of the local and strategic highway network? What improvements to the highway network would be required to support a medium-large scale facility?
   - **How would the SWLP ensure that any future development of the site for waste management facilities would not result in unacceptable impact on highway safety or severe residual cumulative impacts on the road network? (NPPF, paragraph 109)**
   - **Could the required transport mitigation works be delivered? Are they feasible and viable?**

94. Is the Council confident that the development of the site would be able to meet the requirements of Policy 14 of the SWLP, including in relation to potential impacts on the environment and local communities, such as those relating to water resources, flood risk, contamination, visual impact, noise, odour, vibration, fumes and dust? How has this been assessed?
   - **Is this assessment sufficiently thorough and are the conclusions robust?**
   - **Does the Council’s document Management of Impacts on Human Communities Arising from Waste Management (ED-01) satisfactorily demonstrate that issues such as noise, vibration and contamination would be reasonably likely to be addressed?**

95. 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?
   - **Does the SWLP identify how the potential constraints may be overcome?**
   - **Does the evidence base justify the allocation of the site?**