Hearing Statement Summary

Matter 5: Allocations and ILAS

On behalf of SMECH Management Company Ltd

Incorporating work from PFA Consulting

September 2019

C11786
Hearing Statement Summary

Matter 5: Allocations and ILAS

On behalf of SMECH Management Company Ltd

Incorporating work from PFA Consulting

September 2019
## Contents

0.0 Introduction  

1.0 Response to Matter 5: Allocations and ILAS  

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.0</td>
<td>Introduction</td>
<td>1</td>
</tr>
<tr>
<td>1.0</td>
<td>Response to Matter 5: Allocations and ILAS</td>
<td>2</td>
</tr>
</tbody>
</table>
0.0 Introduction

0.1 This Hearing Statement Summary has been prepared by DPDS Consulting Group (DPDS) on behalf of SMECH Management Company Ltd. It summarises our response to the questions included in Matter 5 of the Hearings Programme as requested by the Inspector in their ‘Examination Guidance Note 2’ dated 2nd September 2019. This matter is in relation to the Allocations of the Surrey Waste Local Plan 2019-2033.

0.1 DPDS’s response is largely in respect of the proposed MRF allocation at Land adjacent to Trumph Farm, Longcross (Policy 11b) and how it is unsound based on the NPPF tests of not being ‘positively prepared’, ‘justified’, ‘effective’ or ‘consistent with national policy’ with respect to the following significant constraints of the site:

- Green Belt location;
- Ancient Woodland;
- Accessibility and Highways impact.

It is therefore requested this allocation is removed and more sound and suitable alternative sites properly considered.
1.0 Response to Matter 5

1.0.1 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?

1.1 DPDS consider Policy 10 to not ‘clearly identify’ a preference for development on sites outside the Green Belt.

1.2 Insufficient consideration has been given to assessing the suitability of Green Belt sites. An additional level of scrutiny is required, which is to consider the quality of Green Belt land and how well the land performs in terms of the Green Belt functions (NPPF para 134).

1.3 With regard to the Trumps Farm allocation, the site is not proposed to be removed from the Green Belt in the emerging Runnymede Local Plan 2030. This is supported by Green Belt Reviews which identify the Trumps Farm area as performing a highly valuable Green Belt function.

1.4 In comparison, the alternative Green Belt site consideration at Lyne Lane, Chertsey was assessed as not performing a highly valuable Green Belt function.

1.5 By considering additional assessment criteria, a more robust site selection would ensue and avoid allocation of highly performing sites when more suitable alternatives are indeed available.

Q72. 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?

1.6 Sites such as Trumps Farm will remain in the Green Belt in Local Plans despite being allocated in the SWLP, therefore restricting deliverability. Further, this site (amongst others) is allocated within the currently adopted SWP 2008 and has failed to come forward in the plan period.

1.7 As discussed in para 1.3, the Trumps Farm site serves an important Green Belt function and it will be difficult to justify ‘very special circumstances’ (VSC) for development (as required by the NPPF).

Q73. 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?

1.8 There is lack of clarity in the SWLP, particularly in relation to the need for proposals to comply with all policies/supporting text and other policy/guidance. For example Policy 1 and Policy 14, while referring to constraints and designations of land, do not make specific reference to the need for proposals within the Green Belt to demonstrate VSC.

Q74. 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?
The SWLP claims sufficient opportunity to meet the capacity requirement for waste management, however there appears a reliance on the Trumps Farm allocation for an MRF. DPDS consider the site undeliverable given the severity of constraints (Green Belt, highways and ancient woodland) which need to be overcome. It must also be noted that the site has failed to be delivered during the previous plan period.

Additionally, the cumulative impacts combined with emerging housing allocations at Longcross, Chertsey and Virginia Water (which have not been sufficiently acknowledged within the SWLP) could have substantial effects on the Strategic Road Network (SRN). Runnymede BC are not expected to resolve appropriate highway mitigation until at least Autumn 2019.

DPDS consider the constraints at Trumps Farm to be unresolvable during the plan period and more suitable sites are available to deliver the required capacity.

Q75. 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?

The SWLP only explicitly identifies whether an allocation is suitable for a thermal treatment facility.

The exception to this is the allocation at Trumps Farm which is the only allocation explicitly identified for a specific type of facility (MRF) and a proposed capacity noted in the supporting text (albeit contradictory between SWLP Part 1 and 2). DPDS dispute the soundness of this allocation and the proposed capacity (discussed below).

Q76. 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?

The evidence base does not make it clear why the Trumps Farm site has been allocated for an MRF nor is it clear that any alternative sites have been considered for this use. The site was not recommended for allocation within SWLP 9 nor any other supporting justification. Despite this, the site continues to be allocated.

The proximity principle is discussed at para 1.8-1.18 of the Matter 4 Hearing Statement Summary.

In transport terms, the allocation at Trumps Farm clearly contradicts SCC’s own evidence set out in Section 7 of the SWLP Transport Study (July 2018) (SWLP 19) and completely ignores the cumulative impact that the allocation, alongside other emerging allocations, would have on the SRN. There is also contradiction in terms of proposed capacity, with the Transport Study identifying 50,000tpa as suitable (given the current highways infrastructure), but the supporting text for Policy 11b identifying a capacity of 120,000tpa. This ignores the fact that such capacity is wholly dependent on suitable highways mitigation which is currently uncertain.

DPDS consider the Trumps Farm allocation to have been rolled forward with insufficient consideration given to Green Belt justification, highways mitigation or suitable alternative sites.
Q77. 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?

1.18 For Trumps Farm, the allocation relates specifically to a commitment from the Waste Disposal Authority in their Joint Municipal Waste Management Strategy (JMWMS) to develop infrastructure within Surrey to deliver additional capacity for DMR. Further, the SWLP refers to a report presented to the internal Surrey Waste Board which identifies a 'potential benefit of having two MRFs in terms of operational flexibility'. DPDS do not consider the need for an additional facility at Trumps Farm to have been robustly justified, particularly when the Waste Needs Assessment (2019) identifies that even the existing MRF facility at Leatherhead is not operating at its full capacity.

1.19 In terms of deliverability of Trumps Farm, there remains two fundamental constraints. Firstly, the site is located in a part of the Green Belt which isn’t proposed for removal by the LPA, therefore requiring VSC to be demonstrated. Secondly the SWLP itself identifies, albeit inconspicuously within supporting text/footnotes, that deliverability of the MRF at the capacity of 120,000 tpa (para 5.3.4.10) is wholly dependent on highways mitigation regarding the SRN. As discussed previously, there is no certainty that adequate mitigation will be agreed/delivered in the plan period.

Q113. Would the proposed allocation meet the identified need for specific additional capacity for DMR? Taking into account the proposed allocations in Policy 11a, does the evidence demonstrate that the proposed Policy 11b allocation is necessary to meet that need?

1.20 The supporting text of Policy 11b states that 84,704 tpa of DMR are dealt with outside of Surrey.

1.21 It is proposed that the Trumps Farm allocation, if it reaches the expected capacity (up to 120,000 tpa), will resolve this deficit. However if highways improvements are not delivered the site can only operate at 50,000 tpa, thus leaving an approximate deficit of 34,704 tpa.

1.22 The Waste Needs Assessment (2019) (page 52) highlights that the Leatherhead MRF in 2017 had a throughput of 34,161 tpa – significantly below its capacity of 53,693 tpa. It is not clear from the evidence base whether increasing the capacity of the existing MRF (to meet the deficit for Surrey) has been properly considered.

Q114. The site is not previously developed land (PDL), is within the Green Belt, and contains areas of ancient woodland. Does the evidence demonstrate that the allocation of the site is justified and would be preferable to reasonable alternative allocations when considered in relation to the locational hierarchy of the spatial strategy for waste management facilities?

1.23 There is no justified reasoning as to why Trumps Farm has been preferred to alternative sites (such as the Lyne Lane, Chertsey).

1.24 Although the Lyne Lane site is located within the Green Belt, the recent RBC Green Belt Review suggests it is performing a lesser function than the land at Trumps Farm. The site is also not subject to ancient woodland or severe highways constraints.

1.25 In summary, the allocation at Trumps Farm is in direct conflict with the SWLP’s own locational hierarchy/spatial strategy. This is by virtue of the allocation being in an area of highly performing...
Green Belt, an area comprising irreplaceable ancient woodland, and an area vulnerable to experiencing a severe cumulative highways impact.

Q115. In other respects, in comparison to other reasonable alternative sites, is the proposed site allocation justified, clear and robust, including in relation to the proximity principle, and its location in relation to the Strategic Road Network (SRN)?

1.26 The Trumps Farm site is furthest away from the SRN of allocated sites, 6.9km from the nearest connection. Further, highways impact in the vicinity remains a significant issue in the context of the emerging Runnymede housing allocations previously discussed.

1.27 DPDS remain unconvinced that the application of the proximity principle is unjustified, as set out in para 1.8-1.18 of our Matter 4 Hearing Statement Summary.

1.28 There is no justification as to why the site at Trumps Farm would be preferred to alternatives such as the site at Lyne Lane, Chertsey which is arguably just as well suited to serve the north east of the county.

1.29 The Lyne Lane site was considered in Section 6 of the SCC Transport Study. Paragraph 6.1.2 explains that the site has suitable visibility and geometry for HGV movements.

1.30 The Transport Study concludes that medium sized waste facility types with capacities up to 120,000tpa could be considered at Lyne Lane.

1.31 In contrast, the Transport Study (Section 7) suggests that only small facilities with capacities under 50,000tpa could be accommodated at Trumps Farm; the evidence shows that this site is not yet suitable for large or medium facilities.

1.32 SCC’s own Transport Study therefore concludes that Lyne Lane would be more suitable for a 120,000tpa MRF than Trumps Farm which is wholly dependent on highways mitigation.

1.33 The site at Lyne Lane is not located in close proximity to emerging housing allocations (in line with the NPPW ‘land use conflict’ guidance), does not contain ancient woodland and is located closer to the SRN than Trumps Farm.

1.34 Further, Section C-7 of Appendix C to the Environmental & Sustainability Report (SWLP 5) assesses site allocations in Runnymede including Trumps Farm. Under the ‘Ecological Networks’ assessment heading, it states the following for specific Waste Management Facilities:

changes in air quality (e.g. heathland or grassland habitats). On a precautionary basis it is recommended that the site would not be an appropriate location for any waste management development making use of processes that give rise to emissions to air, or that give rise to additional HGV traffic.

It is therefore concerning that the site continues to be proposed for allocation when the evidence base assesses it as inappropriate.

1.35 The Trumps Farm allocation does not make clear that the 120,000 tpa capacity is dependent on highways mitigation. If mitigation discussions fail to reach a positive outcome it would have major implications on the deliverability/viability of the SWLP.
Q116. For clarity and effectiveness, should the wording of the policy clearly indicate a requirement for compliance with other policies within the SWLP and include a cross-reference to Policy 9, on development within the Green Belt?

1.36 In the submission SWLP, only the supporting text (paragraph 5.3.4.11) for Policy 11b references compliance with other policies.

1.37 Similarly, only in the supporting text (paragraph 5.3.4.10) is it acknowledged that Trumps Farm is located within the Green Belt, however no reference is made to the fact that ‘very special circumstances’ will need to be demonstrated to justify the site’s development.

1.38 Mindful of the nature of constraints on the Trumps Farm site (Green Belt, ancient woodland and cumulative highways impact), it appears as though the SWLP has failed to acknowledge their significance and the substantial hurdles they pose on deliverability.

Q117. The evidence indicates that the site is allocated in the current Waste Local Plan 2008. What assessment has been undertaken of why the site has not previously come forward for development? Is the site reasonably likely to be deliverable within the plan period?

1.39 During the previous plan period an application was submitted on the Trumps Farm site for an Energy from Waste (EfW) facility received by SCC in July 2008 (SCC Ref. 2008/0093). The application was withdrawn in December 2009 but it is unclear what the reasons for this were. Indeed, no subsequent application has been submitted therefore it is clear that operators do not feel confident of being able to overcome the constraints (Green Belt, highways impact and ancient woodland) on the site to achieve permission for a waste facility. This position is expected to continue in the next plan period.

Q118. The key development issues for the site, identified within Part 2 of the SWLP, include a number of European sites (Special Protection Areas, Special Areas of Conservation, Ramsar site), a Site of Special Scientific Interest 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?

1.40 The allocation at Trumps Farm contains two areas of Ancient Woodland which is an ‘irreplaceable habitat’; loss or deterioration of which is “wholly exceptional” (NPPF Paragraph 175)

1.41 The allocation at Trumps Farm has not demonstrated that there will not be any loss or deterioration of ancient woodland.

Q119. 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?

1.42 Section 7 of the Transport Study discusses the Trumps Farm site but reveals a number of inconsistencies.

1.43 Paragraph 7.1.2 states:
1.44 However, visibility is restricted to the south where a 60mph speed limit applies. This is acknowledged in paragraph 7.4.1 which suggests that to improve safety / access arrangements, a reduction in the speed limit on Kitsmead Road may be required.

1.45 Paragraph 7.1.3 states:

Furthermore, there is an ongoing problem with vehicles overshooting the junction when approaching Longcross Road on Kitsmead Lane. Various measures have been introduced to try and address the problem (enhanced signing, road markings, hazard marker posts etc). However, personal injury collisions continue to occur at the junction.

1.46 Paragraph 7.2.2 says:

7.2.2 The most noticeable area of delay, which affects the access to the SRN, is found on the B386 Holloway Hill, on the approach to the mini-roundabout with the A320 Guildford Road, with delay of 30 - 100 seconds recorded. The congestion continues along the A320 St Peter's Way, on the approach to the M25. Westbound flow on the A320 St Peter's Way is especially bad in the AM peak hour.

1.47 Thus, on SCC’s own analysis within the Transport Study, access to the site and access to the SRN are not good, either in terms of road safety or road capacity.

1.48 No evidence is yet available that schemes to mitigate the impact on the A320 can be identified and delivered in a timely manner and at a reasonable cost.

Q120. 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 proposed 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 small - medium size facility?

1.49 We have serious concerns regarding the cumulative impact of the Trumps Farms site in combination with housing allocations at Longcross Garden Village (LGV) and Virginia Water South.

1.50 LGV includes 1,700 homes, of which 200 homes have received planning consent, plus Business Park and associated amenities. A development of this scale can be expected to generate significant volumes of traffic on local roads including Kitsmead Lane and Longcross Road, as well as on the SRN.

1.51 There is no evidence in the SWLP that the cumulative effect with LGV has been considered, with Trumps Farm expected to generate 80 – 137 HGV movements per day.
The NPPW highlights the importance of considering cumulative impacts in waste planning.
Paragraph 1 states:

“Positive planning plays a pivotal role in delivering this country’s waste ambitions through:
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;

Paragraph 5 of the NPPW adds the following assessment criterion:

- the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.

In relation to cumulative impacts paragraph 5.4.2.49 of the Submission SWLP states:

Where the development of new waste management facilities, or redevelopment of an existing facility, is proposed, the planning application should take account of the relationship of that site to other new development (including non-waste development) that has been proposed or permitted within the local area. Where assessments have been undertaken in respect of those proposals, the information submitted in support of the proposed waste development should include consideration of the potential for in-combination effects. Where short-term significant adverse impacts are identified e.g. during construction of a new facility it is important that any significant adverse impacts in the short-term, e.g. the impacts of HGVs on residential or visual amenity, are outweighed by the long-term benefits.

Criterion ix) of SWLP Policy 14 states:

ix) Cumulative impacts arising from the interactions between waste developments, and between waste development and other forms of development.

Therefore cumulative impacts should be a key consideration as outlined in the NPPW and Submission SWLP itself.

Given the potential cumulative impacts of Trumps Farm in combination with LGV (and Virginia Water South), the severe transport, social and environmental impacts demonstrate that the allocation does not comply with the NPPW.

Paragraphs 7.3.8 and 7.3.9 of the Transport Study discuss the types of waste management that could take place at the Trumps Farm site. Paragraph 7.3.8 summarises the concerns outlined above:

7.3.8 From the evidence gathered above, it is clear to see that although there is little congestion in the vicinity of the site, there are large amounts of delay on the preferred SRN route, which is also a relatively long distance from the site. In addition, there are some collisions near to the site, and while the road and current access arrangements are appropriate, a reduction in collisions is required. Furthermore, there are very large developments in the vicinity of the site, at Longcross and in Chersley South, which could have an impact on the suitability of site.
1.59 Paragraph 7.3.9 goes on to suggest that small facility types with capacities under 50,000 tpa could be considered at Trumps Farm, such as windrow composting, in-vessel composting and anaerobic digestion, as the impact of their additional vehicles on the network is likely to be minimal.

1.60 Section 7.4 does suggest a number of mitigation measures including a reduction in the speed limit on Kitsmead Lane and improvements to the junction of Longcross Road and Kitsmead Lane. This section also comments that further improvement proposals exist in association with LGV, but are subject to the adoption of the Runnymede Local Plan. Improvement proposals are therefore vague and uncertain.

1.61 Paragraph 7.5.3 of the Transport Study states in relation to Trumps Farm:

> 7.5.3 It should be noted that the preferred access corridor to the SRN is lengthy and involve using the already congested routes in the vicinity of the M25. The corridor also passes close to some large nearby developments which could have a further detrimental impact on the congestion and on the viability of certain facility types. The nearest developments are to the west of the site at Longcross (North and South) and there are other developments in and around Virginia Water and Chertsey. It is important that the TA accompanying any application should assess the impact of these developments and the intensification of use at the waste site on the capacity of the highway network, in accordance with Policy 15 of the SWLP.

1.62 Paragraph 7.5.4 adds that:

> 7.5.4 As such, it is suggested that small sized facility types (with capacities under 50,000 tpa) could be accommodated at this site. In transport terms, the evidence shows that this site is not yet suitable for large or medium capacity facilities, but may be able to accommodate a medium sized intensification of activities if suitable mitigation is implemented. It is also imperative that this site is considered in association with the proposed site at Lyne Lane and the other large developments in the vicinity of the site.

The implication is that detailed assessment of the impact of Trumps Farm on the safety and capacity of the highway network is therefore yet to take place, and the implications are currently unknown.

1.63 Section 7 of the Transport Study also identifies a number of issues. Paragraph 7.2.7 acknowledges that with increased flows, collisions in the vicinity of Trumps Farm may increase.

1.64 Paragraph 7.2.2 describes congestion affecting access to the strategic road network. This includes delay affecting the access to the SRN on the B386 Holloway Hill on the approach to the mini-roundabout with the A320 Guildford Road and congestion along the A320 St Peter’s Way on the approach to the M25. Paragraph 7.5.3 goes on to note that the preferred access corridor to the SRN is lengthy and passes close to some large developments which could have a further detrimental impact on the congestion and on the viability of certain facility types.

1.65 The mitigation measures suggested in Section 7.4 of the Transport Study which may enable a small or medium sized development are, in summary:

- Reduction in speed limit on Kitsmead Lane;
• Improvement at the Hardwick Lane / Holloway Hull junction as identified in the A320 study, subject to both the adoption of the Runnymede Local Plan and the progression of the Longcross South site;

• Improvements at the junction of the B386 Longcross Road and Kitsmead Lane.

1.66 Notwithstanding the above, the Transport Study recommendation relating to a small facility set out in Section 7 is ignored in the summary in Section 12. Paragraph 12.1.4 states:

12.1.4 From the evidence shown in this report, the majority of the sites are capable of medium sized facility types with capacities up to 120,000 tpa. These sites are at Slyfield, Lyne Lane, Trumps Farm, Lambs Business Park and Martys Lane. They have average collision rates, reasonable distances to the SRN, some congestion in the vicinity of the site, and some impact on existing vehicle movements. However,

1.67 This recommendation, rather than the recommendation in Section 7 of the Transport Study, was taken forward in allocating Trumps Farm for an MRF.

1.68 Table 7.1 of the Transport Study suggests that a MRF at Land adjacent to Trumps Farm would result in 97 – 166 additional vehicles per day in total, including 80 – 137 HGVs, equivalent to an increase of 130% - 223% in HGVs on Kitsmead Lane, and a 49% - 84% increase in HGVs on Longcross Road.

1.69 Given the safety record and congestion issues discussed in the Transport Study, the proposal for a MRF at Trumps Farm is considered incompatible with the proposed LGV and the relevant Policy 11b fails to make clear the complete dependence on highways mitigation in order for the allocation of the proposed capacity to be deliverable.

Q121. 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 the potential impacts on areas of ancient woodland, the potential archaeological importance of the site, other aspects of the environment, and local communities? How has this been assessed?

1.70 The Trumps Farm site is severely constrained and DPDS are not convinced that it will be able to meet the requirements of Policy 14. Indeed, there has been no explanation as to how any of these constraints could be overcome.

Environmental Impacts

1.71 The Strategic Environmental Assessment and Sustainability Report (December 2018) (SWLP5) states, in relation to Trumps Farm, that for the ‘safeguarding of ecological assets and designated sites, the development of the site was assessed as being of ‘high’ significance’ and adverse across all development types.’

1.72 The SWLP provides no clear strategy as to how the constraint of the ancient woodland, an irreplaceable habitat, would be addressed in the Trumps Farm allocation coming forward.

1.73 Furthermore, the SWLP has failed to acknowledge the operational SANG to the south of Trumps Farm. It is considered that the addition of a MRF will result in a cumulative impact on the amenity of the SANG.
Amenity

1.74 The Trumps Farm site is located in close proximity to the proposed housing allocation at LGV (and Virginia Water South) and would detrimentally impact the amenity of future residents. This is not addressed in the SWLP.

1.75 For clarity, DPDS would like to make clear on behalf of our client that they also have fundamental concerns regarding the LGV allocation.

1.76 The proposed route of HGVs will also pass by a number of existing (and future) residential areas, negatively affecting the amenity of these dwellings.

Air Quality

1.77 The cumulative impacts on air quality, as a result of increased vehicle movements from Trumps Farm and other emerging allocations not considered in the Air Quality Assessment (SWLP 15), is likely to have a much greater impact than ‘medium-significance’ noted in SWLP5.

1.78 It should also be noted that the ‘M25’ AQMA is located just 2.5km east of Trumps Farm.

Q122. 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?

1.79 The Trumps Farm allocation is incapable delivery given the severity of site constraints (highly functioning Green Belt, irreplaceable ancient woodland and highways impact). There is not a reasonable prospect of overcoming all constraints which is evident from no development during the previous plan period.

1.80 Any planning application would need to demonstrate ‘very special circumstances’ for development in the Green Belt and ‘wholly exceptional circumstances’ for loss or deterioration of ancient woodland. These circumstances do not exist given that there are more suitable alternative sites available.

1.81 In transport terms, Part 2 of the SWLP does not properly quantify the constraints, only stating:

| Indicative scale | Small size (up to 50,000 tpa) but potentially medium size (up to 120,000 tpa) with improvements to the highway network. |
| Transport | Access to the site is gained from the west, off Kitsmead Lane, which links to the A320 to the south east, via the B386. The site is likely to be able to accommodate small scale facility types (with capacities of up to 50,000 tpa) without wider improvements to the highway network. |

1.82 Mitigation with regards to impact on the A320 requires significant stakeholder input and agreement which is not expected to be resolved until late 2020. Delivery of mitigation would have an even longer timescale.