Surrey Waste Local Plan
Examination

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

23 August 2019
**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?

**Council’s Response:**

Does Policy 10 clearly identify the hierarchical preference for the location of new facilities?

71.1 No. This is because it is considered that opportunities could come forward in locations within any of the categories that would be suitable. This is consistent with national policy and provides both certainty and flexibility by allowing for changes in circumstances over the plan period e.g. as sites become available and landowner intentions for development change. (For example, the former Wisley Airfield is allocated in the current *Waste Plan 2008 (Ref. SWPS-23)*. Planning permission was granted for an in-vessel composting facility in 2010 and as recently as 2012 the landowner confirmed an interest in developing further waste uses. Since then the landowner has successfully promoted the site for a new settlement through the Guildford Borough Local Plan and has no longer any intention of developing it for waste management purposes). However, it is considered that a modification is required to make it clear that there is a preference for development on sites outside the Green Belt. The text of the proposed modification is as follows:

**Policy 10 – Areas suitable for development of waste management facilities**

Planning permission will be granted for the development of facilities (excluding permanent deposit) at the following locations:

1) Sites allocated under Policy 11a – Strategic Waste Site Allocations, **not in the Green Belt** or
3) On land identified as an ‘Industrial Land Area of Search’ as shown in the policies maps.
iii) On any other land identified for employment uses or industrial and storage purposes by district and borough councils.

iv) On land considered to be previously developed and/or redundant agricultural and forestry buildings and their curtilages.

v) On land that is otherwise suitable for waste development when assessed against other policies in the Plan.

Planning permission will be granted for a Household Waste Materials Recycling Facility on land allocated under Policy 11b – Allocation of a Site for a Household Waste Materials Recycling Facility, if it is shown that the need cannot be met at any of the locations described in i) to iv) above and the proposal is consistent with other policies of the Plan including Policy 9 concerning Green Belt.

Planning permission will be granted for the development of facilities (excluding permanent deposit) on land allocated under Policy 11a that is within the Green Belt, if it is shown that the need cannot be met at any of the locations described in i) to iv) above and the proposal is consistent with other policies of the Plan including Policy 9 concerning Green Belt.

Does the policy clearly indicate a preference for development on sites outside the Green Belt, including allocated sites?

71.2 No – see proposed change set out above.

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?

Council’s Response:

72.1 The purpose of allocating sites in the Green Belt is to provide certainty that development can come forward which will address the waste management capacity gap identified by the plan. The sites have been assessed and found to offer opportunities for waste development which could come forward without resulting in unacceptable impacts on the environment and communities. Therefore, if it is shown that no other suitable sites exist beyond the Green Belt, then it is entirely possible for a case to be made that exceptional circumstances exist allowing inappropriate development within the Green Belt in these locations. In assessing the suitability of these sites, the level of harm that might arise has already been assessed in principle
and it has been found development could come forward that would not result in levels that would be unacceptable.

72.2 The allocation of these sites therefore provides a ‘safety net’ that ensures the delivery of the required quantum of waste management capacity

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?

Council’s Response:

73.1 All policies in the SWLP should be complied with. This is stated in SWLP Part 1, paragraphs 1.1.1 and 5.1.1.5. Modifications are proposed to Policy 10 which include specific reference to Policy 9.

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?

Council’s Response:

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?

74.1 Yes. Table 7 of the Site Identification and Evaluation Report (SWLP 9) sets out the land that could be provided by each site and the total land that is provided through site allocations as well as the total land estimated to be required.

74.2 Appendix 3 of the same report sets out the calculations made to estimate the amount of land required to meet the waste management capacity gap.

74.3 It is considered that this information does not need to be in the SWLP document itself. The process is described in paragraphs 4.3.2.2 – 4.3.2.4 of the SWLP Part 1 and the evidence report is referenced.
74.4 It is anticipated that ILAS would also contribute to meeting the identified capacity requirement for waste management provision. *Existing Waste Operations on Proposed ILAS (ED-02)* sets out the waste management capacity currently provided within ILAS (approximately 512,000 tpa). The *Delivery of Waste Management Capacity in Surrey 2008 – 2017 document (SWLP 11)* sets out the additional waste management capacity provided on land used for industrial or storage purposes over the period of the current plan (approximately 23,500 tpa). In addition, Surrey County Council (the Council) is currently considering a planning application for an additional approximately 100,000 tpa waste management facility within an ILAS (see paragraph 77.4 below).

What constraints have been identified to the deliverability of proposed provision? Are these constraints capable of resolution?

74.5 Development criteria, which highlight particular matters which may potentially constrain development for each site proposed for allocation, are included in SWLP Part 2. These are potential constraints which are considered to be capable of resolution by applying mitigation in the way the facility is designed and operated. An indication of the type and scale of facility that is likely to be suitable at specific sites has been provided where certain constraints (e.g. prominence of the site in the landscape) might affect this. This is considered further in responses to questions about specific sites below.

**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?

**Council’s Response:**

75.1 The SWLP Part 2 makes clear that a range of waste management facilities would be suitably located on the proposed allocations or ILAS. The NPPW (para. 4) states that policy should identify the “broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area ... taking care to avoid stifling innovation”.

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75.2 SWLP Part 2 contains an indicative scale for potential facilities for allocated sites, which is linked to potential constraints.

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?

Council’s Response:

76.1 Yes. The identification of ILAS is set out in the *Industrial Areas of Search Identification Report (SWLP 10)*. ILAS are existing or proposed employment areas. These have already been identified or allocated by boroughs and districts in their adopted (or emerging) Local Plans and are well located and accessible to major centres of population and therefore to the source of waste arisings.

76.2 The identification of the sites proposed for allocation is set out in the *Site Identification and Evaluation Report (SWLP 9)*. This was an open and transparent process and subject to scrutiny during earlier consultation stages.

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?

Council’s Response:

77.1 Five of the allocated sites amount to an area of approximately 19 acres. This excludes land north east of Slyfield Industrial Estate which is largely required to accommodate the relocation of existing facilities, but which still has the potential to provide additional capacity. The amount of land needed is approximately 6 hectares. (SWLP para 4.3.2.4)

77.2 Discussions have taken place with all landowners and plans for at least one of the sites are well advanced with the owner/operator.

77.3 In one case there is not landowner support for the allocation of ILAS (See Guildford Borough SoCG with Ds & Bs para 6.2). However, given the lifetime of the plan and the huge range in character of potentially suitable waste uses (see *Existing Waste*...*)
Operations on Proposed ILAS, Ref ED-02), and the fact that many of these sites have existing waste uses, the allocation is considered justified and consistent with the general planning policy approach.

77.4 A planning application for a waste transfer centre and recycling centre accepting up to approximately 100,000 tpa will be determined by the Council most probably in October 2019 (Planning & Regulatory Committee 16 October) within ILAS 1 (Brooklands Industrial Park, Wintersells Road Industrial Park and Byfleet Industrial Estate).

77.5 The sites proposed for allocation are considered suitable and deliverable – specific matters relating to their suitability and deliverability are addressed in responses to questions about the sites below.

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?

Council’s Response:

78.1 The spatial strategy (SWLP Part 1) has been developed in line with national planning policy and guidance. This sets out that development is preferred on sites and areas outside of the Green Belt (this includes allocated waste sites, existing waste sites, Industrial Land Areas of Search and other suitable sites), followed by sites and areas within the Green Belt (including allocated sites, existing sites within the Green Belt and other suitable sites) and then sites and areas which are likely to result in significant adverse impacts to ‘areas or assets of particular importance’ (SWLP Part 1, Figure 5).

78.2 Whilst evidence indicates that there is less certainty that industrial estates and other industrial and employment land offer opportunities to deliver waste management infrastructure, this land is still preferred over sites and areas within the Green Belt and sites and areas which are likely to result in significant adverse impacts to areas or assets of particular importance and as such need to be considered.

78.3 Furthermore Industrial Estates and other industrial and employment land are still important as they do provide significant capacity including smaller specialist waste
management units (see *Existing Waste Operations on Proposed ILAS, Ref ED-02* and response to Q74 above).

### 78.4

A planning application has recently been received for a waste transfer station and recycling facility at Brooklands Industrial Park, Wintersells Road, West Byfleet, located in ILAS 1. This provides an example of where ILAS can help to contribute towards waste management capacity. The application will most probably be considered by the Council’s Planning & Regulatory Committee on 16 October 2019.

### 78.5

The possibility that Industrial Estates may offer opportunities for waste management is recognised in paragraphs C9 to C11 and clause (i) of Policy WD2 in the existing adopted Surrey Waste Plan 2008 that also includes a list of industrial estates (Table 3.1) with potential to accommodate waste management facilities.

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**Council’s Response:**

### 79.1

The proximity of residential development and any change in character as a result of conversions have been considered in discussions with districts & boroughs. Some potential ILAS were ruled out on this basis (See *SWLP 10*).

### 79.2

Article 4 Directions are used to protect industrial estates in Elmbridge Borough. Runnymede Borough Council is in the process of placing Article 4 Direction on Thorpe Industrial Estate (*ILAS 14*). Other Boroughs own industrial estates and residential conversions would be contrary to their own strategic Local Plan policies.

### 79.3

All ILAS are identified in Local Plans or emerging Local Plans as being safeguarded for employment purposes.

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**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?
Council’s Response:

80.1 The proximity of the identified ILAS to sensitive receptors (i.e. residential properties, schools, hospitals, etc.) is taken into account in the course of the SEA/SA as part of the assessment of the impact of waste related development on human communities. For each of the twenty-two ILAS full details of the assessment of the potential for adverse impacts associated with emissions of noise, light or odour can be found in Appendix D to the *Environmental and Sustainability Report (ESR) (SWLP 5)*. The *Site Identification and Evaluation Report (SWLP 9)* also takes account of the potential impacts on sensitive receptors from a range of issues (such as noise, odour and dust) in identifying suitable sites for waste use (Sieve J – Proximity to Sensitive Receptors).

80.2 Although not listed as a key environmental sensitivity, the generation of noise and odour from any waste management facilities located within a proposed ILAS has not been ignored. The levels of noise and odour generated at waste management facilities are a function of the type, size and nature of the facility and the types of waste managed. Modern waste management facilities can be sited and operated in a manner which does not result in unacceptable impacts caused by noise and odour. This is demonstrated by a document that has recently been prepared as part of the engagement with District and Borough Councils associated with the preparation of a *Statement of Common Ground* (Ref. SOCG-01). This document, titled “Management of Impacts on Human Communities Arising from Waste Management” (June 2019) *(ED-01)* has been submitted to the Inspector (and published in the examination library) and provides evidence that demonstrates how different impacts arising from waste management can be mitigated. The document also provides case studies of waste management facilities, that have been granted permission, showing how mitigation has been employed to avoid impacts on neighbouring communities. As well as these case studies there are numerous examples of waste facilities, not just in Surrey, which have been successfully developed in close proximity to sensitive receptors such as residential areas.

80.3 Furthermore, as explained in paragraph 1.2.2 of Part 2 of the SWLP, it is the case that the ILAS coincide with land allocated in adopted (and emerging) Local Plans for B2 (general industry) and B8 (storage and distribution) and uses. The process of allocating these areas in the Local Plans will, to a certain extent, already have considered the suitability of such uses (which may have potential to emit noise and odour) in these locations.
80.4 In light of this it is considered that it is possible for waste management development to come forward within the ILAS that will not result in unacceptable impacts due to noise and odour.

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?

Council’s Response:

81.1 The M25 forms the western boundary to the site, rather than the eastern boundary. This change has been added to the Table of Proposed Additional Modifications (SCCD-002).

81.2 The column identifying current uses refers only to Area A, which is incorrect. Removing the text ‘Area A’ has been added to the Table of Proposed Additional Modifications (SCCD-002).

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?

Council’s Response:

82.1 The Plan is now adopted (although subject to Judicial Review) and so the description needs to be updated to state ‘adopted plan’ (see Proposed Additional Modifications, SCCD-02) otherwise no changes required.
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?

Council’s Response:

83.1 Yes. Key related evidence is included in the submitted Health Impact Assessment (Ref. SWLP13). Section 7 of this document includes an assessment of impacts on health arising from each of the allocated sites. In assessing the impacts, the study took account of the Air Quality Impact Assessment (Part One and Part Two) (SWLP15) which considered four different emission scenarios based on actual facilities. Key conclusions for the four sites with housing within 250 metres of the site boundary are as follows:

83.2 Former Weylands Sewage Treatment Works (see section 7.2)

“The site is sufficiently distant from high sensitivity receptors for on-site activities to be unlikely to give rise to significant impacts on local residents, irrespective of the type of waste management facility developed.”

83.3 Land to the north east of Slyfield Industrial Estate (see Section 7.3)

“Due to the site’s shape and area, it is considered that any development coming forwards could be situated within the site so it is located further away from sensitive receptors, which could help to reduce the impact of development.”

“The site is sufficiently distant from high sensitivity receptors for on-site activities to be unlikely to give rise to significant adverse impacts on local residents, irrespective of the type of waste management facility developed.”

83.4 Land at and adjoining Leatherhead Sewage Treatment Works (see section 7.4)

“The site is not located in close proximity to large numbers of high sensitivity receptors, but potential for significant impacts on local residents cannot be dismissed due to the presence of two residential properties on the site access road.”
The properties on the site access road are located approximately 190m from the site boundary.

83.5 Oakleaf Farm (see Section 7.8)

83.6 “The site is located in close proximity to a large number of residential properties, and therefore the potential for significant impacts on local residents cannot be dismissed. The site is already in use for waste related development, and further intensification of that use could result in changes to the levels of traffic and associated emissions generated by the site. The site is situated within an area covered by a borough wide AQMA, and whilst background air quality in the vicinity does not currently exceed the relevant air quality objectives for nitrogen dioxide or particulate matter, air pollution is a key concern for the local population. The proximity of the site to Heathrow Airport, and to the M25 motorway means that background levels of tranquility are low, with additional noise another matter of concern for local residents.” As set out in the response to Q.80, it is entirely possible for waste management facilities to be developed within 250 metres of housing and there are many examples which demonstrate this. The document mentioned in response to Q.80 includes development at Oakleaf Farm as a case study of how mitigation has been employed to ensure that waste management in this location does not detrimentally impact on nearby housing. This allocated site is enclosed by significant earth bunding which will further help mitigate impacts on nearby housing.

83.7 As part of the planning application process the County Planning Authority will require that applicants submit information about the potential impacts of the proposed development on nearby sensitive receptors, and the mitigation measures that would be deployed to ensure that any such impacts were not significant. Details of the specific circumstances in which the County Planning Authority would require applicants to submit assessments of impacts on nearby sensitive receptors are set out in Annex 2 (Waste Related Development) to the Local List for the Validation of County Development and County Matters Planning Applications (SWPS-11).

83.8 For facilities with the potential to give rise to odour the Local Validation List advises that an assessment of the impact of odour would have to be provided where sensitive receptors are situated within 250 metres of sites involved in the management of putrescible wastes or in composting. Such assessments would have to be prepared in accordance with the guidance set out in the Institute of Air Quality Management (IAQM) publication Guidance on the Assessment of Odour for Planning (originally published in 2014, updated in 2018). Where such assessments recommend mitigation be deployed such measures can be required by planning condition (or legal agreement) as appropriate.
83.9 For facilities with the potential to give rise to bioaerosol the Local Validation List (SWPS-11 Annex 2 Air Quality) advises that an assessment of the impact of odour would have to be provided where sensitive receptors are situated within 250 metres of sites involved in the management of putrescible wastes (including transfer stations, recycling facilities, disposal facilities), composting, anaerobic digestion, physical treatment of organic wastes. Such assessments would have to be prepared in accordance with relevant guidance on bioaerosol risk assessment published by the Health and Safety Executive (Bioaerosol Emissions from Waste Composting and the Potential for Workers’ Exposure, 2010) and other competent bodies including the Environment Agency. Where such assessments recommend mitigation be deployed such measures can be required by planning condition (or legal agreement) as appropriate.

83.10 Complementary to the controls available through the planning regime the Environment Agency, as part of the environmental permitting process, will specifically consider risks and mitigation associated with impacts of bioaerosols and odours when composting and biological treatment facilities are proposed within 250m of housing.

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?

Council’s Response:

84.1 No. SWLP Part 2 Section 5.1 notes that the site would facilitate the replacement of the existing community recycling centre, waste transfer station and sewage treatment works.

84.2 As noted in the Site Identification and Evaluation Report (Section 4.2.3.1) (SWLP 9), although much of the land at Slyfield is required for the relocation of existing facilities (some 9.86 ha of the total 12.7 ha site), the remainder of the land at the site could potentially contribute towards meeting identified shortfall in waste
management capacity. This would however be subject to more detailed space requirements – particularly for the replacement sewage works.

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?

Council’s Response:

85.1 The assessment set out in Appendix C (Part C-4) to the ESR (SWLP 5) for the proposed allocated site covers the relationship of the land to a range of ecological receptors, with the land classed as being of high sensitivity in terms of the potential for adverse impacts on biodiversity. The assessment set out in the ESR is based on a worst-case scenario, and therefore concludes that development of the land for waste management purposes could give rise to unmitigated adverse impacts of high significance. Mitigation of adverse impacts on habitats and species would primarily be achieved through the application of Policy 14 (Development Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the type and scale of waste related development that would be pursued.

85.2 The Key Biodiversity Information Report (KBIR) (August 2018) (SWPS-10), which summarises the outcomes of a Biodiversity Information Centre records check for the proposed allocated site, notes the presence of reptiles in the vicinity of the land and highlights the potential for populations or individuals to be present on the land. The likely impact of the proposed development on the habitat of the protected species and other species is addressed in Appendix C (Part C-4) to the ESR (SWLP 5), which concludes that significant impacts could arise due to the loss of habitat. Mitigation of adverse impacts on species and their habitats would primarily be achieved through the application of Policy 14 (Development Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the type and scale of waste related development that would be pursued.
85.3 The HRA Report for the SWLP (SWLP 7) includes an assessment of the potential for waste related development of the site to give rise to significant adverse impacts on the integrity of European sites within 10 kilometres as a consequence of the deposition of nutrient nitrogen emissions from fixed plant and equipment (e.g. thermal treatment of waste) and from waste related traffic. The HRA (SWLP 7) recommends that the proposed site allocation would be an unsuitable location for a large scale (>50,000 tpa) thermal treatment plant but does not rule out the possibility of a smaller scale (<50,000 tpa) thermal treatment facility subject to detailed assessment at the planning application stage. The HRA (SWLP 7) concludes that emissions from traffic generated by the development of the allocated site for waste management purposes would not contribute to significant impacts on the European sites, alone or in-combination.

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?

Council’s Response:

86.1 Following identification of a shortlist of sites considered to be suitable for allocation at the Draft Plan stage, detailed technical assessment work was undertaken in order to further understand the suitability of each site for different types of waste related development.

86.2 This assessment work included a Landscape and Visual Sensitivity Study (SWLP 16), Transport Study (SWLP 19), Strategic Flood Risk Assessment (SWLP 18), Air Quality Impact Assessment (SWLP 15), and Health Impact Assessment (SWLP 13).

86.3 The AQIA (SWLP 15) assesses potential cumulative impact from all sites operating concurrently, (p. 110).

86.4 The LVSS (SWLP 16) considers cumulative impacts at the Slyfield site in para. 3.20.

86.5 The Transport Study (SWLP 19) acknowledges potential cumulative impacts at the Slyfield site in para. 3.3.4 and 3.3.5.

86.6 Development that is proposed in draft local plans has a degree of uncertainty with regards to type and scale, and it is therefore difficult to confidently assess likely cumulative impacts from this development alongside potential waste related
development at the plan making stage. With regard to the Slyfield site, it is intended that the majority of the site will be taken up by facilities replacing the existing community recycling centre, waste transfer station and sewage treatment works. It is therefore expected that the majority of vehicle trips and emissions generated by development at this site will displaced from the previous location, rather than being additional.

86.7 The assessment work undertaken (as referenced above in 86.2) has sought to acknowledge potential cumulative impacts and to provide an indication of where these may arise. It has also identified potential mitigation measures. This assessment work should inform more detailed assessment of cumulative impact and potential mitigation measures at the application stage, as set out in SWLP Part 2 Section 2.2.2.3.

86.8 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (Including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

Council’s Response:

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?

87.1 The Transport Study (SWLP 19) undertaken for the SWLP assesses potential transport impacts from development at the site (section 2).

87.2 This includes:

1. Acknowledgement of the potential cumulative impacts of development at this site and at other proposed development nearby (Paras 3.3.4 and 3.3.5)

2. Assessment of traffic conditions (section 3.2), through assessment of current congestion, collision data (road safety) and current and proposed flows (capacity).
3. Mitigation requirements (Section 3.4) including those required to support a large facility.

4. Other site considerations (section 3.3), such as preferred vehicle routing and types of waste management likely to be suitable at each site.

87.3 The *Transport Study (SWLP 19)* found that all of the sites proposed for allocation in the SWLP would be suitable for waste related development in principle, and that it would be possible for development to take place at each site without having significant adverse impacts on the highway network. However, this would be dependent on the type and scale of development that comes forwards, as well as any mitigation measures proposed.

87.4 The *Transport Study (SWLP 19)* focused on assessing the local road network around each site, no assessment was undertaken for impact of development at the site on the Strategic Road Network. This is something that would be assessed at the planning application stage and is required by Policy 15.

87.5 The Highways England Regulation 19 representation on the SWLP (Rep. ID 65) is supportive of the Policies in the plan as they seek to ensure that there will be no adverse impact on the efficiency or the safety of the SRN as a result of development at the sites proposed for allocation. They raise no objection to the inclusion of any of the sites in the SWLP.

87.6 Improvements to the highway network to accommodate a medium-large scale facility will depend on the net increase in traffic and the potential to spread traffic movements away from peak periods. If mitigation is required, this could amount to improvements to signal technology at the junction of Moorfield Road with the A 320. As part of the Slyfield Area Regeneration Project led by Guildford Borough Council a link road is proposed to the east which, if implemented, would remove the need for such junction improvements.
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?

Council’s Response:

88.1 All allocated sites have been subjected to strategic technical assessments: Transport, Flood Risk, Ecological, and Landscape & Air Quality. Key development issues are clearly set out in Part 2 which would need particular attention at the planning application stage. The assessments show that in principle it is possible to develop waste management uses at the allocated sites without significant adverse impacts occurring on the environment and local communities.

88.2 Ultimately whether a development can meet the requirements of Policy 14 will depend on the characteristics of the development and the quality and level of mitigation proposed.

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?

Council’s Response:

89.1 The site has undergone a range of technical assessment work (including a Landscape and Visual Sensitivity Study (SWLP 16), Transport Study (SWLP 19), Strategic Flood Risk Assessment (SWLP 18), Air Quality Impact Assessment (SWLP 15), and Health Impact Assessment (SWLP 13)). Each of these assessments indicates that the site is suitable for waste related development. SWLP Part 2 contains information on potential constraints to inform and guide development proposals however it is considered that these constraints could be dealt with appropriately through sensitive design and operation of the facility and that allocation of the site in the SWLP is justified based on the evidence base.
Site B(i) – 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?

Council’s Response:

90.1 The site clearly presents opportunities for development and environmental improvements. It is currently a mixture of waste and storage uses. Infrastructure is poor and the uses are largely beyond planning control. Continuation of the status quo is not a desirable outcome.

90.2 Continued allocation will incentivise redevelopment for modern waste uses. It is a large site and even partial redevelopment for waste uses could provide significant additional capacity.

90.3 Discussions have been held with the site owners and the borough council. The biggest obstacle for new waste management infrastructure is seen by the owners as the continued Green Belt designation. However, the Council cannot remove the site from the Green Belt (this is a role for the Borough Council). The Council will seek the site’s removal from the Green Belt during the next consultation period (Reg 18) of the review of the Local Plan (19 Aug – 30 Sept 2019). This has so far been resisted by the borough council. Nevertheless, even if the site remains in the Green Belt, it is considered that there are no insuperable obstacles to the development of the site for waste purposes given its characteristics and the environmental benefits that could be delivered (See response to Question 70).
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?

Council’s Response:

91.1 The assessment set out in Appendix C (Part C-2) to the ESR (SWLP 5) for the proposed allocated site covers the relationship of the land to a range of ecological receptors, with the land classed as being of high sensitivity in terms of the potential for adverse impacts on biodiversity. The assessment set out in the ESR (SWLP 5) is based on a worst case scenario, and therefore concludes that development of the land for waste management purposes could give rise to unmitigated adverse impacts of high significance. Mitigation of adverse impacts on habitats and species would primarily be achieved through the application of Policy 14 (Development Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the type and scale of waste related development that would be pursued.

91.2 The HRA Report for the SWLP (SWLP 7) includes an assessment of the potential for waste related development of the site to give rise to significant adverse impacts on the integrity of the European sites within 10 kilometres as a consequence of the deposition of nutrient nitrogen emissions from fixed plant and equipment (e.g. thermal treatment of waste) and from waste related traffic. The HRA recommends that the proposed site allocation could be a suitable location for a small-scale (<50,000 tpa) thermal treatment plant but does not rule out the possibility of a larger thermal treatment facility subject to detailed assessment at the planning application stage. The HRA (SWLP 7) concludes that emissions from traffic generated by the development of the allocated site for waste management purposes would not contribute to significant impacts on the European sites, alone or in-combination.
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?

Council’s Response:

92.1 Following identification of a shortlist of sites considered to be suitable for allocation at the Draft Plan stage, detailed technical assessment work was undertaken in order to further understand the suitability of each site for different types of waste related development.

92.2 This assessment work included a Landscape and Visual Sensitivity Study (SWLP 16), Transport Study (SWLP 19), Strategic Flood Risk Assessment (SWLP 18), Air Quality Impact Assessment (SWLP 15), and Health Impact Assessment (SWLP 13).

92.3 The AQIA (SWLP 15) assesses potential cumulative impact from all sites operating concurrently, (p. 110).

92.4 The LVSS (SWLP 16) considers cumulative impacts at the Weylands site in para. 3.10.

92.5 The Transport Study (SWLP 19) considers potential cumulative impacts at the Weylands site in para. 2.3.3 and 2.3.4.

92.6 Development that is proposed in draft local plans has a degree of uncertainty with regards to type and scale, and it is therefore difficult to confidently assess likely cumulative impacts from this development alongside potential waste related development at the plan making stage. The majority of sites proposed for allocation in the SWLP are suitable for a range of possible waste related development. This adds further complexity when seeking to robustly assess likely cumulative impacts at the plan making stage.

92.7 The assessment work undertaken (referred in 92.2 above) has sought to provide an indication of where cumulative impacts are likely to arise which should inform more detailed assessment of cumulative impact at the application stage.

92.8 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (Including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.
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?

Council’s Response:

How have the potential transport impacts of the proposed allocation been assessed, including cumulative impacts of this proposal and other proposed development nearby?

93.1 The Transport Study (SWLP 19) undertaken for the SWLP assesses potential transport impacts from development at the site (section 2). Proposed local development proposed nearby the site is noted in paragraphs 2.3.3 and 2.3.4.

93.2 Assessment of cumulative transport impacts of this proposal and other proposed development nearby is left to the application stage. This is as the type and scale of development (and associated vehicle movements) that could occur at each site proposed for allocation within the plan, as well as other nearby local development is uncertain at the plan making stage and it is therefore not possible to reach definitive conclusions regarding the acceptability of cumulative impacts.

93.3 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (Including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

Would the development of the proposed allocation have a significant adverse impact on the safety and capacity of the local and strategic highway network?

93.4 Assessment of traffic conditions, including collision data, is analysed in section 2.2 of the Transport Study (SWLP 19). The Transport Study (SWLP 19) found that all of the sites proposed for allocation in the SWLP would be suitable for waste related development in principle, and that it would be possible for development to take place at each site without having significant adverse impacts on the highway network (giving consideration to road safety and capacity). However, this would be dependent on the type and scale of development that comes forwards, as well as any mitigation measures proposed.
What improvements to the highway network would be required to support a medium-large scale facility?

93.5 Mitigation requirements for the site, including those required to support a large development are set out in section 2.4 of the Transport Study (SWLP 19).

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?

Council’s Response:

94.1 The site has undergone a range of technical assessment work relating to potential impacts of waste related development on the environment and on communities. Assessment work includes:

- **SEA/SA (SWLP 5)** – water resources
- **Strategic Flood Risk Assessment (SWLP 18)** – Flood Risk
- **Landscape and Visual Sensitivity Study (SWLP 16)** – Visual Impact
- **Transport Study (SWLP 19)**,
- **Air Quality Impact Assessment (SWLP 15)** – odour, fumes and dust

94.2 Each of these assessments indicates that the site is suitable for waste related development and that development of the site would be able to meet the key requirements of Policy 14. Any key development issues identified in this assessment work to be addressed as part of any application are included in **SWLP Part 2** the section for each allocated site under “key development issues”.

94.3 It is noted that the SWLP did not undertake assessments to understand the potential impacts from contamination, noise, and vibration that could arise from development at the sites. It is considered that these potential impacts can be addressed at the planning application stage. The document **Management of impacts on Human Communities arising from waste management (ED-01)** demonstrates that practical mitigation of such impacts can be applied.
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?

Council’s Response:

95.1 The site has undergone a range of technical assessment work (including a Landscape and Visual Sensitivity Study (SWLP 16), Transport Study (SWLP 19), Strategic Flood Risk Assessment (SWLP 18), Air Quality Impact Assessment (SWLP 15), and Health Impact Assessment (SWLP 13)). Each of these assessments indicates that the site is suitable for waste related development. SWLP Part 2 contains information on potential constraints to inform and guide development proposals however it is considered that these constraints could be dealt with appropriately through sensitive design and operation of the facility and that allocation of the site in the SWLP is justified based on the evidence base provided.

Site B(ii) – Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead (Part 2 Allocation 5.3)

96. The key development issues for the site, identified within Part 2 of the SWLP, include European sites (Special Protection Area, Special Area of Conservation), Sites of Special Scientific Interest, a site of nature conservation importance, a national nature reserve, 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?

Council’s Response:

96.1 The assessment set out in Appendix C (Part C-5) to the ESR (SWLP 5) for the proposed allocated site covers the relationship of the land to a range of ecological receptors, with the land classed as being of high sensitivity in terms of the potential for adverse impacts on biodiversity. The assessment set out in the ESR (SWLP 5) is based on a worst case scenario, and therefore concludes that development of the land for waste management purposes could give rise to unmitigated adverse impacts of high significance. Mitigation of adverse impacts on habitats and species would primarily be achieved through the application of Policy 14 (Development
Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the type and scale of waste related development that would be pursued.

96.2 The HRA Report for the SWLP (SWLP 7) includes an assessment of the potential for waste related development of the site to give rise to significant adverse impacts on the integrity of the European sites within 10 kilometres of the site as a consequence of the deposition of nutrient nitrogen emissions from fixed plant and equipment (e.g. thermal treatment of waste) and from waste related traffic. The HRA (SWLP 7) recommends that the proposed site allocation is less suited to the development of all scales of thermal treatment plant but does not rule out other the possibility of such a facility subject to detailed assessment at the planning application stage. The HRA (SWLP 7) concludes that emissions from traffic generated by the development of the allocated site for waste management purposes would not contribute to significant impacts on the European sites, alone or in-combination.

97. 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?

Council’s Response:

97.1 Following identification of a shortlist of sites considered to be suitable for allocation at the Draft Plan stage, detailed technical assessment work was undertaken in order to further understand the suitability of each site for different types of waste related development.

97.2 This assessment work included a Landscape and Visual Sensitivity Study (SWLP 16), Transport Study (SWLP 19), Strategic Flood Risk Assessment (SWLP 18), Air Quality Impact Assessment (SWLP 15), and Health Impact Assessment (SWLP 13).

97.3 The AQA (SWLP 15) assesses potential cumulative impact from all sites operating concurrently, (p. 110).

97.4 The LVSS (SWLP 16) considers cumulative impacts at the Leatherhead site in para. 3.30.

97.5 The Transport Study (SWLP 19) notes potential cumulative impacts at the Leatherhead site in para. 4.3.3 and 4.3.4.
97.6 Development that is proposed in draft local plans has a degree of uncertainty with regards to type and scale, and it is therefore difficult to confidently assess likely cumulative impacts from this development alongside potential waste related development at the plan making stage. The majority of sites proposed for allocation in the SWLP have been found to be suitable for a range of possible waste related development. This adds further complexity when seeking to robustly assess likely cumulative impacts at the plan making stage.

97.7 The assessment work undertaken has sought to provide an indication of where cumulative impacts are likely to arise which should inform more detailed assessment of cumulative impact at the application stage, this is noted in SWLP Part 2 para. 2.2.2.3.

97.8 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (Including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

98. 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 sized facility?

Council’s Response:

How have the potential transport impacts of the proposed allocation been assessed, including cumulative impacts of this proposal and other proposed development nearby?

98.1 The Transport Study (SWLP 19) undertaken for the SWLP assesses potential transport impacts from development at the site (section 4). Proposed local development proposed nearby the site is noted in paragraphs 4.3.3 and 4.3.4.

98.2 Assessment of cumulative transport impacts of this proposal and other proposed development nearby is left to the application stage. This is as the type and scale of development (and associated vehicle movements) that could occur at each site
proposed for allocation within the plan, as well as other nearby local development is uncertain at the plan making stage and is therefore difficult to assess.

98.3 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

Would the development of the proposed allocation have a significant adverse impact on the safety and capacity of the local and strategic highway network?

98.4 Assessment of traffic conditions, including collision data, is analysed in section 4.2 of the Transport Study (SWLP 19). The Transport Study (SWLP 19) found that all of the sites proposed for allocation in the SWLP would be suitable for waste related development in principle, and that it would be possible for development to take place at each site without having significant adverse impacts on the highway network (giving consideration to road safety and capacity). However, this would be dependent on the type and scale of development that comes forwards, as well as any mitigation measures proposed.

What improvements to the highway network would be required to support a medium-large scale facility?

98.5 Mitigation requirements for the site, including those required to support a large development are set out in section 4.4 of the Transport Study (SWLP 19).

99. 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 noise, odour and dust? How has this been assessed?

Council’s Response:

99.1 The site has undergone a range of technical assessment work relating to potential impacts of waste related development on the environment and on communities. Assessment work includes:

- **Air Quality Impact Assessment (SWLP 15)** – odour, fumes and dust
- **SEA/SA (SWLP 5)** – water resources
- Strategic Flood Risk Assessment (SWLP 18) – Flood Risk
- Landscape and Visual Sensitivity Study (SWLP 16) – Visual Impact
- Transport Study (SWLP 19),

99.2 Each of these assessments indicates that the site is suitable for waste related development and that development of the site would be able to meet the key requirements of Policy 14. Any key development issues identified in this assessment work to be addressed as part of any application are included in SWLP Part 2 the section for each allocated site under “key development issues”.

99.3 It is noted that the SWLP did not undertake assessments to understand the potential impacts from contamination, noise, and vibration that could arise from development at the sites. It is considered that these potential impacts can be addressed at the planning application stage. The document Management of Impacts on Human Communities arising from waste management (ED-01) demonstrates that practical mitigation of such impacts can be applied.

100. 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?

Council’s Response:

100.1 The site has undergone a range of technical assessment work (including a Landscape and Visual Sensitivity Study (SWLP 16), Transport Study (SWLP 19), Strategic Flood Risk Assessment (SWLP 18), Air Quality Impact Assessment (SWLP 15), and Health Impact Assessment (SWLP 13). Each of these assessments indicates that the site is suitable for waste related development. SWLP Part 2 contains information on constraints to inform and guide development proposals however it is considered that these constraints could be dealt with appropriately and that allocation of the site in the SWLP is justified based on the evidence base provided.
Site B(iii) – Oakleaf Farm, Horton Lane, 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 existing 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?

Council’s Response:

101.1 SCC propose an additional modification (SCCD-02) to amend the site plan for Oakleaf Farm for clarity, to include the MRF building and bund to the South-East of the site within the site boundary.

102. The key development issues for the site, identified within Part 2 of the SWLP, include European sites (Special Protection Area, Ramsar site, Special Area of Conservation), Sites of Special Scientific Interest, 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?

Council’s Response:

102.1 The assessment set out in Appendix C (Part C-8) to the ESR (SWLP 5) for the proposed allocated site covers the relationship of the land to a range of ecological receptors, with the land classed as being of high sensitivity in terms of the potential for adverse impacts on biodiversity. The assessment set out in the ESR (SWLP 5) is based on a worst case scenario, and therefore concludes that development of the land for waste management purposes could give rise to unmitigated adverse impacts of high significance. Mitigation of adverse impacts on habitats and species would primarily be achieved through the application of Policy 14 (Development Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the type and scale of waste related development that would be pursued.

102.2 The HRA Report for the SWLP (SWLP 7) includes an assessment of the potential for waste related development of the site to give rise to significant adverse impacts on the integrity of European sites within 10 kilometres of the site as a consequence of...
the deposition of nutrient nitrogen emissions from fixed plant and equipment (e.g. thermal treatment of waste) and from waste related traffic. The \textit{HRA (SWLP 7)} recommends that the proposed site allocation could be a suitable location for a small-scale (<50,000 tpa) thermal treatment plant, but does not rule out the possibility of a larger thermal treatment facility subject to detailed assessment at the planning application stage. The \textit{HRA (SWLP 7)} concludes that emissions from traffic generated by the development of the allocated site for waste management purposes would not contribute to significant impacts on the European sites, alone or in-combination.

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 other development nearby?

\textbf{Council’s Response:}

103.1 Following identification of a shortlist of sites considered to be suitable for allocation at the Draft Plan stage, detailed technical assessment work was undertaken in order to further understand the suitability of each site for different types of waste related development.

103.2 This assessment work included a \textit{Landscape and Visual Sensitivity Study (SWLP 16)}, \textit{Transport Study (SWLP 19)}, \textit{Strategic Flood Risk Assessment (SWLP 18)}, \textit{Air Quality Impact Assessment (SWLP 15)}, and \textit{Health Impact Assessment (SWLP 13)}.

103.3 The \textit{AQIA (SWLP 15)} assesses potential cumulative impact from all sites operating concurrently, (p. 110).

103.4 The \textit{LVSS (SWLP 16)} considers cumulative impacts at Oakleaf Farm in para. 3.73.

103.5 The \textit{Transport Study (SWLP 19)} considers potential cumulative impacts at Oakleaf Farm in para. 8.3.3 and 8.3.4.

103.6 Development that is proposed in draft local plans has a degree of uncertainty with regard to type and scale, and it is therefore difficult to confidently assess likely cumulative impacts from this development alongside potential waste related development at the plan making stage. The majority of sites proposed for allocation in the SWLP are suitable for a range of possible waste related development. This
adds further complexity when seeking to robustly assess likely cumulative impacts at the plan making stage.

103.7 The assessment work undertaken (referred to in 103.2 above) has sought to provide an indication of where cumulative impacts are likely to arise which should inform more detailed assessment of cumulative impact at the application stage. This is noted in SWLP Part 2 para. 2.2.2.3.

103.8 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

104. 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 sized facility?

Council’s Response:

How have the potential transport impacts of the proposed allocation been assessed, including cumulative impacts of this proposal and other proposed development nearby?

104.1 The Transport Study (SWLP 19) undertaken for the SWLP assesses potential transport impacts from development at the site (section 8). Proposed local development proposed nearby the site is noted in paragraphs 8.3.3 and 8.3.4.

104.2 Assessment of cumulative transport impacts of this proposal and other proposed development nearby is left to the application stage. This is as the type and scale of development (and associated vehicle movements) that could occur at each site proposed for allocation within the plan, as well as other nearby local development is uncertain at the plan making stage and is therefore difficult to assess.

104.3 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications (SWPS-11).
applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

Would the development of the proposed allocation have a significant adverse impact on the safety and capacity of the local and strategic highway network?

104.4 Assessment of traffic conditions, including collision data, is analysed in section 8.2 of the Transport Study (SWLP 19). The Transport Study found that all of the sites proposed for allocation in the SWLP would be suitable for waste related development in principle, and that it would be possible for development to take place at each site without having significant adverse impacts on the highway network (giving consideration to road safety and capacity). However, this would be dependent on the type and scale of development that comes forwards, as well as any mitigation measures proposed.

What improvements to the highway network would be required to support a medium-large scale facility?

104.5 Mitigation requirements for the site, including those required to support a large development are set out in section 8.4 of the Transport Study (SWLP 19).

105.  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, aerodrome safeguarding, and local communities, such as those relating to visual impact, public rights of way, noise, dust, and fumes? How has this been assessed?

Council’s Response:

105.1 The site has undergone a range of technical assessment work relating to potential impacts of waste related development on the environment and on communities. Assessment work includes:

- Landscape and Visual Sensitivity Study (SWLP 16) – Visual Impact
- Health Impact Assessment (SWLP 13) – Rights of way
- Air Quality Impact Assessment (SWLP 15) – odour, fumes and dust
- SEA/SA (SWLP 5) – water resources
- Strategic Flood Risk Assessment (SWLP 18) – Flood Risk
- Transport Study (SWLP 19)
105.2 Each of these assessments indicates that the site is suitable for waste related development and that development of the site would be able to meet the key requirements of Policy 14. Any key development issues identified in this assessment work to be addressed as part of any application are included in SWLP Part 2 the section for each allocated site under “key development issues”.

105.3 It is noted that the SWLP did not undertake assessments to understand the potential impacts from noise, contamination and vibration that could arise from development at the sites. It is considered that these potential impacts can be addressed at the planning application stage. The document *Management of impacts on Human Communities arising from waste management (ED-01)* demonstrates that practical mitigation of such impacts can be applied.

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?

**Council’s Response:**

106.1 The site has undergone a range of technical assessment work (including a *Landscape and Visual Sensitivity Study (SWLP 16)*, *Transport Study (SWLP 19)*, *Strategic Flood Risk Assessment (SWLP 18)*, *Air Quality Impact Assessment (SWLP 15)*, and *Health Impact Assessment (SWLP 13)*. Each of these assessments indicates that the site is suitable for waste related development. SWLP Part 2 contains information on potential constraints to inform and guide development proposals however it is considered that these constraints could be dealt with appropriately through sensitive design and operation of the facility and that allocation of the site in the SWLP is justified based on the evidence base provided.
Site C(i) – Land at Lambs Business Park, Terra Cotta Road, South Godstone
(Part 2 Allocation 5.5)

107. The key development issues for the site, identified within Part 2 of the SWLP, include a European site (Special Area of Conservation), a Site of Special Scientific Interest, two sites of nature conservation importance, areas of ancient woodland and the potential presence of protected species (Great Crested Newts). 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?

Council’s Response:

107.1 The assessment set out in Appendix C (Part C-10) to the ESR (SWLP 5) for the proposed allocated site covers the relationship of the land to a range of ecological receptors, with the land classed as being of high sensitivity in terms of the potential for adverse impacts on biodiversity. The assessment set out in the ESR (SWLP 5) is based on a worst case scenario, and therefore concludes that development of the land for waste management purposes could give rise to unmitigated adverse impacts of high significance. Mitigation of adverse impacts on habitats and species would primarily be achieved through the application of Policy 14 (Development Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the type and scale of waste related development that would be pursued.

107.2 The Key Biodiversity Information Report (KBIR) (August 2018) (SWPS-10), which summarises the outcomes of a Biodiversity Information Centre records check for the proposed allocated site, notes the presence of great crested newts in the vicinity of the land and highlights the potential for populations or individuals to be present on the land. The likely impact of the proposed development on the habitat of the protected species and other species is addressed in Appendix C (Part C-10) to the ESR (SWLP 5), which concludes that significant impacts could arise due to the loss of habitat. Mitigation of adverse impacts on species and their habitats would primarily be achieved through the application of Policy 14 (Development Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the type and scale of waste related development that would be pursued.
107.3 The HRA Report for the SWLP (SWLP 7) includes an assessment of the potential for waste related development of the site to give rise to significant adverse impacts on the integrity of European sites within 10 kilometres as a consequence of the deposition of nutrient nitrogen emissions from fixed plant and equipment (e.g. thermal treatment of waste) and from waste related traffic. The HRA (SWLP 7) recommends that the proposed site allocation could be a suitable location for a small-scale (<50,000 tpa) thermal treatment plant, but does not rule out the possibility of a larger thermal treatment facility subject to detailed assessment at the planning application stage. The HRA (SWLP 7) concludes that emissions from traffic generated by the development of the allocated site for waste management purposes would not contribute to significant impacts on the European sites, alone or in-combination.

108. 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?

Council’s Response:

108.1 Following identification of a shortlist of sites considered to be suitable for allocation at the Draft Plan stage, detailed technical assessment work was undertaken in order to further understand the suitability of each site for different types of waste related development.

108.2 This assessment work included a Landscape and Visual Sensitivity Study (SWLP 16), Transport Study (SWLP 19), Strategic Flood Risk Assessment (SWLP 18), Air Quality Impact Assessment (SWLP 15), and Health Impact Assessment (SWLP 13).

108.3 The AQIA (SWLP 15) assesses potential cumulative impact from all sites operating concurrently (p. 110).

108.4 The LVSS (SWLP 16) considers cumulative impacts at Lambs Business Park in para. 3.83.

108.5 A further Visual Options Study (SWLP 17) was undertaken for the site at Lambs Business Park. This considers cumulative impacts on p. 14.

108.6 The Transport Study (SWLP 19) notes potential cumulative impacts at the Lambs Business Park site in para. 9.3.3 and 9.3.4.
108.7 Development that is proposed in draft local plans has a degree of uncertainty with regards to type and scale, and it is therefore difficult to confidently assess likely cumulative impacts from this development alongside potential waste related development at the plan making stage. The majority of sites proposed for allocation in the SWLP are suitable for a range of possible waste related development. This adds further complexity when seeking to robustly assess likely cumulative impacts at the plan making stage. The evidence base for the allocated sites in the SWLP has been produced in accordance with NPPF para. 2, noting that spurious precision should be avoided. Cooperation and consultation with Tandridge District Council has taken place throughout preparation of the SWLP including in relation to the Lambs site (Duty to Cooperate Evidence of Engagement Statement, SWLP 21).

108.8 The assessment work undertaken (referenced in para. 108.2 above) has sought to provide an indication of where cumulative impacts are likely to arise which should inform more detailed assessment of cumulative impact at the application stage. This is noted in SWLP Part 2 para. 2.2.2.3.

108.9 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (Including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the Council’s adopted Local List for the validation of planning applications, which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

109. How have the likely landscape and visual impacts of the potential development options of the proposed allocation been assessed, including in relation to the historic landscape? Are the findings of this assessment clear and robust? Do they support the allocation of the site?

Council’s Response:

109.1 The Landscape and Visual Sensitivity Study (LVSS) (SWLP 16) and Landscape and Visual Options Study (LVOS) (SWLP 17) for the SWLP assess the potential landscape and visual impacts that could arise from development at the site.

109.2 The historic landscape forms part of the Landscape Character Sensitivity Criteria used in the LVSS (SWLP 16) (Table 2) and is considered as part of each site assessment.

109.3 The assessment contains conclusions regarding the Landscape sensitivity to waste related infrastructure (p. 68), visual sensitivity to waste related infrastructure (p. 68),
the potential for development to affect landscape designations (p. 69-70) and the
sites ability to accommodate different types of waste related development (p. 70).
There is also a paragraph stating that development of most types of waste facilities
at the site is likely to comply with Policy 14 of the SWLP (para. 3.84).

109.4 The conclusions of the assessment fully support the allocation of the site in the
SWLP.

110. 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 or large sized
facility? Does the evidence demonstrate that the use of rail sidings to support the
proposed development of the site is feasible and reasonably likely?

Council’s Response:

How have the potential transport impacts of the proposed allocation been assessed,
including cumulative impacts of this proposal and other proposed development
nearby?

110.1 The Transport Study (SWLP 19) undertaken for the SWLP assesses potential transport
impacts from development at the site (section 9). Proposed local development
proposed nearby the site is acknowledged in paragraphs 9.3.3 and 9.3.4.

110.2 Assessment of cumulative transport impacts of this proposal and other proposed
development nearby will need to be revisited in detail at the application stage. This
is as the type and scale of development (and associated vehicle movements) that
could occur at each site proposed for allocation within the plan, as well as other
nearby local development is uncertain at the plan making stage and is therefore
difficult to assess.

110.3 At the application stage, proposals will need to demonstrate how they comply with
Policy in the plan (Including Policy 14, B, ix which relates specifically to cumulative
impacts) as well as the Council’s adopted Local List for the validation of planning
applications (SWPS-11), which specifically requires assessment of cumulative impact
of the proposal alongside existing or permitted development in the vicinity.
Would the development of the proposed allocation have a significant adverse impact on the safety and capacity of the local and strategic highway network?

110.4 Assessment of traffic conditions, including collision data, is analysed in section 9.2 of the *Transport Study (SWLP 19)*. The *Transport Study (SWLP 19)* found that all of the sites proposed for allocation in the SWLP would be suitable for waste related development in principle, and that it would be possible for development to take place at each site without having significant adverse impacts on the highway network (giving consideration to road safety and capacity). However, this would be dependent on the type and scale of development that comes forwards, as well as any mitigation measures proposed.

What improvements to the highway network would be required to support a small, medium or large sized facility?

110.5 Mitigation requirements for the site, including those required to support a large development are set out in section 9.4 of the *Transport Study (SWLP 19)*.

Does the evidence demonstrate that the use of rail sidings to support the proposed development of the site is feasible and reasonably likely?

110.6 The landowner (Appendix 5, *Reg 22 Consultation Statement, SWLP 1*), has assured the Council (at meetings) that use of the rail sidings to support the development is feasible and likely. The landowner submitted correspondence from Network Rail alongside their representation on the Submission Plan (Reg 19) which indicates that the use of the rail siding is feasible and likely (Appendix 2 and 3 in Rep ID 158).

111. 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, public rights of way, contamination, water resources, noise, illumination, fumes and odour? How has this been assessed?

Council’s Response:

111.1 The site has undergone a range of technical assessment work relating to potential impacts of waste related development on the environment and on communities. Assessment work includes:

- *SEA/SA (SWLP 5)*— water resources
- *Strategic Flood Risk Assessment (SWLP 18)* — Flood Risk
• *Landscape and Visual Sensitivity Study (SWLP 16)* – Visual Impact
• *Transport Study (SWLP 19)*,
• *Air Quality Impact Assessment (SWLP 15)* – odour, fumes and dust

111.2 Each of these assessments indicates that the site is suitable in principle for waste related development and that development of the site would be able to meet the key requirements of Policy 14.

111.3 Ultimately whether or not a development can meet the requirements of Policy 14 will depend on the characteristics of that development and the quality and level of mitigation proposed.

111.4 It is noted that the SWLP did not undertake assessments to understand the potential impacts from contamination, noise, and vibration that could arise from development at the sites. It is considered that these potential impacts could be addressed. The document *Management of impacts on Human Communities arising from waste management (ED-01)* demonstrates that practical mitigation of such impacts can be applied.

112. 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?

**Council’s Response:**

112.1 The site has undergone a range of technical assessment work (including a *Landscape and Visual Sensitivity Study (SWLP 16)*, *Landscape and Visual Options Study (SWLP 17)*, *Transport Study (SWLP 19)*, *Strategic Flood Risk Assessment (SWLP 18)*, *Air Quality Impact Assessment (SWLP 15)*, and *Health Impact Assessment (SWLP 13)*). Each of these assessments indicates that the site is suitable for waste related development. SWLP Part 2 contains information on potential constraints to inform and guide development proposals however it is considered that these constraints could be dealt with appropriately through sensitive design and operation of the facility and that allocation of the site in the SWLP is justified based on the evidence base provided.
Policy 11b – Allocation of a Site for a Household Waste Materials Recycling Facility (Part 2 Allocation 5.6)

113. 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?

Council’s Response:

Would the proposed allocation meet the identified need for specific additional capacity for DMR?

113.1 A need for a facility to deal with approximately 70,000 tpa of DMR is identified in the supporting information supplied by the Waste Disposal Authority. The proposed allocation could potentially accommodate a facility with a capacity up to 120,000 tpa (SWLP Part 2).

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?

113.2 The supporting information supplied by the Waste Disposal Authority (ED-03) assesses the suitability of other allocated sites within the search area to meet this need. In summary, the WDA report indicates that the other allocated sites would not be acceptable for the following reasons:

- Weylands Treatment Works (EL07): As the site is not owned by the WDA there is less certainty that land would be made available for this specific use and the costs associated with developing the land for a household waste MRF could be prohibitive.

- Oakleaf Farm (SP02): Only approximately 3.5 hectares of the site would be developable due to the landscaping bunds surrounding the site. Taken together with the shape of the developable area, the site could not be developed for a household waste MRF without moving the existing commercial and industrial waste MRF, the costs of doing so would make

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1 Trumps Farm: Waste Local Plan Supporting Information RPS Group (ED-03)
mean the project unviable. The site is also right on the edge of the county making it sub-optimal for direct deliveries.

- Land at & adjoining Leatherhead STW, Randalls Road, Leatherhead (MO03): The WDA consider that reduction in levels would be required to avoid unacceptable visual impacts \[IB1\] and, as this involves rep-profiling a closed landfill site this would incur additional costs which is likely to make the development of a MRF by the WDA financially unviable.

- Land to the north east of Slyfield Industrial Estate (GU23): This is not within the WDA search area for a second household waste MRF (but nearby). There is a lack of space or capacity – the majority of the site is planned for the relocation of existing facilities.

- Lambs Brickworks (TA10): This site is in the south east of the county and so is not within the search area for a second household waste MRF.

### 114. 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?

### Council’s Response:

#### 114.1 The supporting information supplied by the Waste Disposal Authority (ED-03) considers the suitability of potential areas outside the Green Belt within the search areas - identified as ILAS in the SWLP. In addition, other potential sites are assessed which are also not PDL including the site in Lyne Lane Chertsey. This information shows how alternative allocations were considered but not considered suitable (see also the response to Q113 above.

#### 114.2 It should be noted that, as set out in Policy 10 (as proposed to be modified), any future application for a DMR MRF on this site would need to demonstrate that sites outside the Green Belt were not available or suitable at the time of the application, in order to comply with Policy 9.

#### 114.3 The site extends to over 6 hectares with an area sufficient to accommodate a DMR MRF as indicated in Table 1 of the *Surrey Landscape and Visual Sensitivity Study of Potential Waste Sites (SWLP 16)* (Surrey Waste Local Plan Part 2). A feasibility drawing (Appendix B ED-07) demonstrates how a building of the scale required,
together with associated infrastructure, could be accommodated on the site whilst retaining and enhancing the ancient woodland.

115. 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)?

Council’s Response:

115.1 The site is available and can deliver a facility of the capacity required. It is well located towards the northern and western side of the county where there is the need for more DMR processing.

115.2 Access to the SRN is via Kitsmead Lane, along the B386 Longcross Road, to the mini roundabout junction with the A320 Guildford Road and then onto St Peter’s Way to the M25 Junction 11. A total of 4.2 miles. The A320 corridor, including the section above, has recently been identified as a priority improvement scheme for Government funding by Transport for the South East. The Transport Study (SWLP 19) found that all of the sites proposed for allocation in the SWLP would be suitable for waste related development in principle, and that it would be possible for development to take place at each site without having significant adverse impacts on the highway network (giving consideration to road safety and capacity). However, this would be dependent on the type and scale of development that comes forwards, as well as any mitigation measures proposed.

116. 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?

Council’s Response:

116.1 It is considered that sufficient clarity is already provided - See paragraph 5.3.4.11 of the Plan which clearly sets out this requirement. The proposed modification to Policy 10 (see response to Q71) also clarifies the position.
117. 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?

Council’s Response:

117.1 The site is owned by the Council and has been retained for the waste disposal authority (WDA) as a potential site for waste management purposes. Due to the need to complete the Council’s major waste facility at Charlton Lane, Shepperton (the Surrey Eco Park) and in the light of rapidly changing legislative and commercial contexts, there was no firm decision made as to the precise form of new waste management infrastructure required by the WDA and hence the site remained undeveloped.

117.2 The site is in the full ownership of the Council, as is the adjoining former landfill site (through which access would be secured). There are therefore no landownership or physical constraints that might prevent a DMR MRF facility being delivered in the near future and, indeed, throughout the Plan period.

118. 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?

Council’s Response:

118.1 The assessment set out in Appendix C (Part C-7) to the ESR (SWLP 5) for the proposed allocated site covers the relationship of the land to a range of ecological receptors, with the land classed as being of high sensitivity in terms of the potential for adverse impacts on biodiversity. The assessment set out in the ESR (SWLP 5) is based on a worst case scenario, and therefore concludes that development of the land for waste management purposes could give rise to adverse impacts of high significance if unmitigated. Mitigation of adverse impacts on habitats and species would primarily be achieved through the application of Policy 14 (Development
Management) of the SWLP, with the specific measures to be deployed being determined at the planning application stage once there is greater certainty as to the scale of waste related development that would be pursued.

118.2 The **HRA Report for the SWLP (SWLP 7)** includes an assessment of the potential for waste related development of the site to give rise to significant adverse impacts on the integrity of European sites within 10 kilometres as a consequence of the deposition of nutrient nitrogen emissions from waste related traffic. The **HRA (SWLP 7)** concludes that traffic generated by any facility located on the allocated site would be unlikely to give rise to significant impacts on the European sites alone or in-combination with other nearby development.

119. **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?**

**Council’s Response:**

119.1 Detailed technical assessment work was undertaken in order to understand the suitability of each site for different types of waste related development. This assessment work included a **Landscape and Visual Sensitivity Study (SWLP 16)**, **Transport Study (SWLP 19)**, **Strategic Flood Risk Assessment (SWLP 18)**, **Air Quality Impact Assessment (SWLP 15)**, and **Health Impact Assessment (SWLP 13)**.

119.2 The **AQIA (SWLP 15)** assesses potential cumulative impact from all sites operating concurrently, (p. 110).

119.3 The **LVSS (SWLP 16)** considers cumulative impacts at the Trumps Farm site in paras. 3.61-3.63.

119.4 The **Transport Study (SWLP 19)** acknowledges potential cumulative impacts at the Trumps Farm site in para. 7.3.4 to 7.3.7.

119.5 Other development that is proposed in draft local plans has a degree of uncertainty, especially with regards to its type and scale, and it is therefore difficult to confidently assess likely cumulative impacts from other development alongside potential waste related development at the plan making stage.

119.6 The assessment work undertaken (as referenced above in 119.1) has sought to acknowledge potential cumulative impacts and to provide an indication of where
these may arise. It has also identified potential mitigation measures. This assessment work should inform more detailed assessment of cumulative impact and potential mitigation measures at the application stage, as set out in SWLP Part 2 Section 2.2.2.3.

119.7 At the application stage, proposals will need to demonstrate how they comply with Policy in the plan (including Policy 14, B, ix which relates specifically to cumulative impacts) as well as the council’s adopted Local List for the validation of planning applications (SWPS-11), which specifically requires assessment of cumulative impact of the proposal alongside existing or permitted development in the vicinity.

120. 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?

Council’s Response:

120.1 The Transport Study (SWLP 19) undertaken for the SWLP assesses potential transport impacts from development at the site (section 7).

120.2 This includes:

   1. Acknowledgement of the potential cumulative impacts of development at this site and at other proposed development nearby (Paras 7.3.4 to 7.3.7)

   2. Assessment of traffic conditions (section 7.2), through assessment of current congestion, collision data (road safety) and current and proposed flows (capacity).

   3. Mitigation requirements (Section 7.4) including those required to support a large facility.

   4. Other site considerations (section 7.3), such as preferred vehicle routing and types of waste management likely to be suitable at each site.

120.3 The Transport Study (SWLP 19) found that all of the sites proposed for allocation in the SWLP would be suitable for waste related development in principle, and that it would be possible for development to take place at each site without having significant adverse impacts on the highway network. However, this would be dependent on the type and scale of development that comes forwards, as well as any mitigation measures proposed.
120.4 The *Transport Study (SWLP 19)* focused on assessing the local road network around each site, no assessment was undertaken for impact of development at the site on the Strategic Road Network. This is something that should be assessed at the planning application stage and is required by Policy 15.

120.5 The Highways England Regulation 19 representation on the SWLP (Rep. ID 65) is supportive of the Policies in the plan as they seek to ensure that there will be no adverse impact on the efficiency or the safety of the SRN as a result of development at the sites proposed for allocation. They raise no objection to the inclusion of any of the sites in the SWLP.

120.6 Also see the response to Q 122.

### Council’s Response:

121.1 The site has undergone a range of technical assessment work relating to potential impacts of waste related development on the environment and on communities. Assessment work includes:

- *SEA/SA (SWLP 5)*— water resources
- *Strategic Flood Risk Assessment (SWLP 18)* — Flood Risk
- *Landscape and Visual Sensitivity Study (SWLP 16)* — Visual Impact
- *Transport Study (SWLP 19)*,
- *Air Quality Impact Assessment (SWLP 15)* — odour, fumes and dust

121.2 Each of these assessments indicates that the site is suitable in principle for waste related development and that development of the site would be able to meet the key requirements of Policy 14.

121.3 The document: *Trumps Farm: Waste Local Plan Supporting Information (ED-03)* includes a full review of how development at the site could be developed in accordance with Policy 14. This includes the assessment of impacts on ancient woodland, communities and the historic landscape.
121.4 Ultimately whether a development can meet the requirements of Policy 14 will depend on the exact characteristics of that development and the quality and level of mitigation proposed and this is something that will be assessed at the project stage.

122. 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?

**Council’s Response:**

122.1 Development criteria which potentially constrain development for each site proposed for allocation is included in SWLP Part 2. Constraints are considered to be capable of resolution through sensitive design and operation of the facility. Part 2 of the SWLP provides an indication of the type and scale of facility that is likely to be suitable at the site.

122.2 Access to the site is good with good access to the strategic road network (see 115.2 above) and very little congestion on the roads in the vicinity of the site (See Transport Study – Site Assessments SWLP 19 Part 1). Land immediately to the south west of the site and south of the M3 is the site for a proposed Garden Village (Longcross South) with an application for over 1300 dwellings, 7,350 m² of employment space and associated retail and community infrastructure expected in 2020 in accordance with the emerging Runnymede Local Plan Policy SD10. There are likely to be large highway alterations in the area to accommodate this new settlement, but there are no proposals as yet other than for the A320 corridor (see below).

122.3 Wider improvements to the highway network are therefore likely to be proposed once the Runnymede Local Plan is adopted (anticipated in 2020) and plans for the Longcross Garden Village are finalised. Other major improvements on the A320, which is part of the route from the site to the SRN, have been given priority by Transport for the South East in a funding submission to the Department for Transport in order to support proposed housing growth in the emerging Runnymede Borough Local Plan.

122.4 Clearly, wider highway improvements may benefit access to the proposed allocation. Hence the importance of a Transport Assessment at the time of any application to ascertain the need for any improvements both directly related to the waste management use and in combination with other developments in the area. Any
directly related and necessary improvements to the highway are likely to be small scale and deliverable.

**Policy 12 - Wastewater Treatment Works**

123. Policy 12 (ii) refers to the use of biogas as an energy source. The policy wording indicates the biogas will be recovered `as appropriate`. This is not referred to within the supporting text. Is the policy wording sufficiently precise? To be justified and effective, should the policy specify when such recovery would be expected?

**Council’s Response:**

123.1 It is agreed that it would be helpful to provide clarification regarding the use of biogas and modifications are proposed to the policy and supporting text as set out below.

<table>
<thead>
<tr>
<th>Policy 12 – Wastewater Treatment Works</th>
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<tr>
<td>Planning permission for the development of Wastewater and Sewage Treatment Works (including sewage sludge management) or for the improvement or extension of existing Wastewater and Sewage Treatment Works will be granted where:</td>
</tr>
<tr>
<td>(i) In the case of a new site, the need cannot be practicably and reasonably met at an existing site.</td>
</tr>
<tr>
<td>(ii) As appropriate, biogas, resulting from any anaerobic digestion of sewage sludge for use as an energy source, will be recovered effectively for use as an energy source using best practice techniques.</td>
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123.2 The suggested modifications to the supporting text are as follows:

5.3.5.5 Efficient energy recovery can occur at Wastewater Treatment Works. When sewage sludge is digested it produces a methane rich biogas which can be burnt to recover energy. This biogas can be used to heat the sewage sludge digesters, and where possible, generate electricity. Where there is excess energy, and the capability to do so, this renewable energy can be exported to the national grid.

5.3.5.6 Depending on its size, combustion plant at Wastewater Treatment Works burning biogas generated from the anaerobic digestion of sewage sludge will require a permit under the Environmental Permitting (England and Wales) Regulations 2010 (as amended).¹

¹ Combustion plant: burning biogas derived from sewage sludge, Environment Agency, March 2014