Hearing Statement- Surrey Waste
Local Plan 2019-2033 Local Plan
Examination

Matter 2: Overall Assessment of Need

On behalf of SMECH Management Company Ltd

August 2019
C11786
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Client: SMECH Management Company Ltd
Reference: C11786
Version: 1
Status: Final
Author: TC
Checked: ER
Approved: LMD
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Introduction

0.1 This statement has been prepared by DPDS Consulting Group (DPDS) on behalf of SMECH Management Company Ltd. It sets out the response to the questions included in Matter 2 of the Hearings Programme. This matter is in relation to the Legal Requirements, the Duty-to Co-operate and the Plan Period.

0.2 DPDS has acted on behalf of SMECH Management Company Ltd since February 2013. DPDS has engaged in the Waste Local Plan since the Regulation 18 Consultation which took place in February 2018. DPDS has also made various representations in respect of both the Runnymede Core Strategy, and more recently, the Runnymede 2030 Draft Local Plan which is also currently undergoing examination.

0.3 Our previous representations have demonstrated that the plan does not comply with the requirements identified at section 20(5)(a) and (c) of the Planning and Compulsory Purchase Act 2004 and that it is not sound.

0.4 This statement should be read in conjunction with previous representations made to the Surrey Waste Local Plan 2019-2033. Hearing Statements have also been submitted on behalf of SMECH Management Company Ltd for Matters 1 and 3-8 of the Local Plan Examination.

0.5 DPDS welcome the invitation to appear at the Hearing Sessions to expand on the comments included in this statement and confirm that representatives from DPDS and associated consultants our company have worked with will be attending the Hearing Sessions.

0.6 The Surrey Waste Local Plan 2019-2033 was submitted on the 12th April 2019 and is therefore subject to policies under the latest version of the National Planning Policy Framework (NPPF) adopted in February 2019.
1.0 Response to Matter 2

Q29. The WNA, paragraphs 4.2.2 - 4.2.2.6, identifies a potential need for additional recycling capacity towards the end of the plan period, a potential requirement for composting facilities, a need for additional Energy from Waste (EfW) capacity, readily available waste transfer stations (WTS) and materials recovery facilities (MRF), and a potential for increased capacity for anaerobic digestion. How does the SWLP address these requirements?

1.1 The SWLP has attempted to address the supposed ‘need’ for additional recycling capacity (and more specifically a MRF facility) through the allocation of the Land adjacent to Trumps Farm under Policy 11b for use as a Dry Mixed Recyclables facility. The supporting text of Policy 11b justifies how this will allow SCC to meet their waste needs.

1.2 The SWLP has allocated a site specifically for use as a DMR facility in order for consistency with the Joint Municipal Waste Management Strategy (JMWMS). The JMWMS does not allow for the export of DMR outside of Surrey. The only other facility in the county for handling DMR is the Randalls Road facility in Leatherhead, this site is currently handling 34,161 tpa and is working below its capacity of 53,693, as noted in Appendix 2 of the WNA. It is unknown whether the site at Leatherhead is able to operate at closer to its capacity or if its capacity is able to be expanded. The site is located centrally within the county, which would make it accessible for all within the county, as opposed to Trumps Farm which is very much located to the North of the county. It is unclear whether SCC have explored this option and whether there is potential for the expansion of this facility. There is no justification as to why this has not been explored as an alternative to the allocation of Trumps Farm.

1.3 It is predicted that the capacity of the site at Trumps Farm in its current state will be able to accommodate a small facility (up to 50,000 tpa) with the potential for a medium sized facility (up to 120,000 tpa) subject to Highways Mitigation. SCC anticipate that the allocation of Trumps Farm will ensure the county is able to handle its DMR waste within Surrey, this complying with the JMWMS.

1.4 It is not believed that there sufficient justification that the allocation of the Land adjacent to Trumps Farm will ensure SCC meet their required waste needs. It is believed that the ability to develop the site at Trumps Farm site into a Medium-sized facility being subject to Highways Mitigation is not made sufficiently clear. Furthermore, there is no reference to the ongoing Runnymede Local Plan Examination, for which the main outstanding issue is Highways Mitigation. The ability for the Trumps Farm site to perform at capacity as a medium-sized facility is therefore at present unknown.

1.5 DPDS also which to note that the site has been allocated in the previous/existing plan Surrey Waste Plan 2008 but did not come forward in the plan period. A number of other sites which were allocated in the previous plan were not continued such as the site at Lyne Lane, Chertsey. Paragraph 120 of the NPPF states that: ‘where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) They should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs;
b) *In the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.*

1.6 In the previous plan period an application did come forward for a waste facility on the site as we have pointed out in other Hearing Statements (SCC Ref 2008/0093) early in the plan period. This application was withdrawn and no application has since come forward, it is clear the site is highly unlikely to be deliverable for a waste facility given the sever number of constraints on the site. It should therefore be questioned whether allocating the site as part of the SWLP is consistent with Paragraph 120 of the NPPF.

1.7 Should the existing facility at Leatherhead and the proposed facility of Land adjacent to Trumps Farm be allocated and operate at their current potential they would not be able to overcome the deficit of waste exported outside of Surrey. It is therefore believed that the allocation of Trumps Farm is not one which is *sound*. The site’s allocation for the reasons of accommodating waste needs is not *justified* given the current situation with the Runnymede Local Plan Examination. Additionally, the site in its current form is not an *effective* in dealing with the county’s waste needs as it is only capable of handling a small-sized facility (50,000 tpa). It is also not *consistent with national policy* as the site is clearly not deliverable given its severe constraints and the failure to come forward in the previous plan period, yet it has continued to be allocated in the plan.

Q30. Is there a demonstrable need for specific additional capacity for dry mixed recyclables (DMR)?

1.8 Whilst supporting text and evidence in Policy 11b highlights that there is additional need for DMR facilities, Paragraph 1.4.3.3 of Part 1 of the SWLP and the associated Table 4 indicates to the contrary that there is no requirement for additional recycling facilities. This highlights another internal inconsistency in the SWLP.

1.9 In addition to this, we would like to draw your attention to the comments made on this issue by Runnymede Borough Council in their Regulation 19 Representations listed as their first point.