MATTER 4: SPATIAL STRATEGY

1. Our response to Matter 4 is submitted on behalf of our client, WT Lamb Holdings Ltd (hereafter WT Lamb).  

2. WT Lamb is generally supportive of the emerging Surrey Waste Local Plan (SWLP). However, in respect of Matter 4: Spatial Strategy our representations can be summarised as follows:
   - Only the Policy 11 allocation provide the certainty that the County’s waste needs will be met over the plan period;
   - In line with national planning policy and the plan-led system, the Policy 11 allocations should be afforded a priority in meeting needs; and
   - There is a legitimate need for allocations to be made in the Metropolitan Green Belt.

Question 63: Is the proposed spatial strategy for the planned provision for new capacity justified and consistent with national planning policy and guidance, including in relation to the focus on towns and urban areas, the use of previously developed land, and impacts on the environment and amenity? Is the identified spatial hierarchy for the location of future waste management provision justified, clear and readily understandable? Do the policies of the plan, including Policies 2, 9 and 10, clearly support the delivery of the spatial strategy and the locational hierarchy?

3. The SWLP’s spatial strategy seeks to accommodate the identified need for additional waste capacity by safeguarding existing facilities, proposing extensions and enhancements to existing waste facilities, and allocating land for development of new facilities in suitable locations:

4. The spatial strategy expresses a preference towards new waste management facilities being located on previously developed sites, sites and areas identified for employment uses and redundant agricultural and forestry buildings and their curtilages.

5. This spatial strategy was informed by a number of ‘key building blocks’. The building blocks cover a range of considerations, including providing sufficient new waste management capacity to meet needs; the need for different types and scale of waste management facilities; allows for otherwise ‘inappropriate development’ in the Green Belt where Very Special Circumstances can be identified; recognises the dispersed nature of Surrey’s population by including a mix of locations; affords a priority to developments on previously developed land, but recognises that greenfield development could also be required; and favours locations that are well connected in terms of the main transport network and supports the use of sustainable modes of transport, including rail.

6. The spatial strategy is used to inform a locational hierarchy, which seeks to direct new and improved waste management facilities to sites in the following preferential order:

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1 WT Lamb Holdings own Lambs Business Park on a freehold basis. The western portion of the site is identified as an allocation in the Submission Surrey Waste Local Plan 2019-2033 (Policy 11a refers). Lambs Business Park is also proposed as an allocation in the Submission Tandridge District Local Plan (hereafter TDC LP), wherein it is acknowledged that the exceptional circumstances exist to remove the site from the Metropolitan Green Belt. Policy SES003 of the TDC LP relates primarily to B-class employment uses, but there is also recognition that, in line with the emerging Surrey Waste Local Plan the western extent of the site is suitable for waste management purposes. The Examination of the Tandridge Local Plan commences in October 2019.
2 Section 2.2 of the Waste Planning Authority’s ‘Report on Delivering the Spatial Strategy’ (April 2019)
3 Para. 4.1.1.1 of the SWLP Part 1
4 Para. 4.1.1.4 of the SWLP Part 1
1. Sites and areas outside the Green Belt, including: allocated waste sites, existing waste sites, Industrial Land Areas of Search (hereafter ILAS) and other suitable sites;
2. Sites and areas within the Green Belt, including: allocated sites, existing sites within the Green Belt and other suitable sites; followed by
3. Sites and areas which are likely to result in significant adverse impacts to ‘areas or assets of particular importance’.

7. By recognising the importance that should be placed on meeting needs from previously developed land, including existing employment sites, but by also acknowledging that greenfield sites, including Green Belt land, could be also be required to meet needs, the Waste Planning Authority’s (hereafter WPA) spatial strategy and the locational hierarchy are consistent with national planning policy and guidance.  

8. They form part of the assessment criteria used to identify the most suitable sites and areas for meeting needs. Accordingly, the spatial strategy and the locational hierarchy are justified, clear and readily understandable.

9. However, the way the WPA have sought to apply the spatial strategy and the locational hierarchy within Policies 2 and 10 in an unbalanced manner, at the expense of other planning considerations, has created inconsistencies with both national planning policy and guidance and the principles of the primacy of the plan-led system.

10. As identified within the SWLP’s evidence base and in line with its locational hierarchy, the WPA undertook a detailed assessment to establish the amount of additional waste management capacity that could be provided from the intensification of existing waste sites and sites within industrial and other employment uses. Neither source of supply, individually or together, could provide the amount of deliverable land required to meet needs.

11. Specific sites were also assessed in line with the spatial strategy and the locational hierarchy. The identified sites were subject of an initial ‘sieving’ exercise, wherein all the Council’s assessment considerations were first applied in parallel (Scenario 1), followed by a secondary exercise (Scenario 2), which did not consider each site’s land status. As outlined in the Report, it is only once the Green Belt policy constraint (Scenario 3) and the Green Belt and the land status sieves were both disapplied (Scenario 4), that an adequate portfolio of sites was identified that could be used to meet the County’s existing and future waste needs. The 5 sites that were not excluded at the third sieving stage are those identified as allocations in the Policy 11a of the SWLP.

12. The Policy 11a allocations have therefore been selected to ensure that there is a sufficient identifiable source of deliverable sites to meet identified needs.

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5 Par. 4 and 6 of the National Planning Policy for Waste and the National Planning Practice Guidance at paras. 018 Ref ID: 28-018-20141016 and 041 Ref ID: 28-041-20141016
6 Para. 15 of the National Planning Policy Framework (hereafter NPPF)
7 SWLP’s ‘Site Identification and Evaluation Report’ (April 2019)
8 SWLP’s ‘Site Identification and Evaluation Report’ (April 2019)
9 SWLP’s ‘Site Identification and Evaluation Report’ (April 2019)
10 Para. 4.4.14 of the ‘Site Identification and Evaluation Report’ (April 2019)
11 Para. 4.3.2.1 of the Part 1 Waste Local Plan
12 Para. 5.2.7 of the Statement of Common Ground between the Surrey District and Boroughs (June 2019)
13. The Policy 11a allocation were also identified in consecutive consultation versions of the SWLP. During these periods, consistent with procedures\(^{13}\), stakeholders were afforded an opportunity to comment on their suitability to accommodate waste management facilities and their conformity with the emerging spatial strategy.

14. Having undertaken this robust technical assessment and public consultation process, it is the allocated sites which the WPA considers as being the *most suitable locations* to accommodate the County’s existing and future waste management needs over the plan period (para. 1.3.1 of the Part 2 Plan refers).

15. Of all the deliverable sites and areas assessed as part of the SWLP’s evidence base, it is the Policy 11a allocations that perform best against the spatial strategy and the locational hierarchy. Their selection strikes the most appropriate balance between the application of the spatial strategy and providing the necessary certainty that the required capacity will be delivered, and in a manner which does not result in significant adverse impacts. They therefore have a pivotal role in ensuring the SWLP is positively prepared, effective, justified and consistent with national planning policy.

16. Given this status, and consistent with the plan-led process, the Policy 11a allocations should be afforded the primary role in providing new waste management facilities to meet the County’s waste management requirements over the plan period.

17. This would ensure that a clear and unambiguous locally derived planning policy framework for addressing the County’s waste management priorities was provided. It would enable all those with an interest in the planning system, including investors, residents, infrastructure providers and the County’s District and Boroughs with the certainty on how a decision maker is likely to react to a development proposal.

18. However, at present neither Policy 2 or Policy 10 provide this necessary clarity. As currently written, both Policies appear to afford the same status to all potential sources of supply, including the Industrial Land Areas of Search (ILAS) and hitherto unidentified sites. This creates uncertainty over how the County’s waste needs are to be met over the Plan period.

19. To address this, there is a need for the Plan’s policies to be based on a cascade approach, where the rightful primacy is afforded to the Policy 11a allocated sites over other potential sources of supply, including the ILAS and other unidentified sites. Planning permission for new waste facilities at the ILAS and other unidentified sites should only be granted if the Policy 11a allocated sites haven’t been brought forward, or it is proven that the need is higher than the SWLP envisaged.

20. Such an approach would ensure that conformity with the spatial strategy and locational hierarchy are balanced alongside other considerations and ensuring that the SWLP is sound.

21. For the Plan to be considered sound, it will need to be both justified and effective. This will inevitably mean identifying deliverable sources of supply to meet needs\(^{14}\). The Council’s evidence base demonstrates that the Policy 11a sites strike the most appropriate balance between the application of the spatial strategy and providing certainty that needs can be met.

\(^{13}\) Para. 15 of the NPPF, para. 3 of the NPPW and para. 012 Ref ID: 28-012-20141016

\(^{14}\) Para. 011 Reference ID: 28-011-20141016 of the NPPG
22. We therefore suggest that Policy 2 and 10 are amended. Our proposed amendments are provided in Appendix 1.

23. Whilst not directly related to Question 64, we have previously raised concerns about the wording of Part B of Policy 2, which is only applicable to schemes that promote the co-location of uses and deliver the benefits sought by national planning policy\(^{15}\).

24. As presently written, proposals that only sought the development of a waste management facility and did not deliver any of the co-location benefits sought by national planning policy, would not be required to demonstrate conformity with the second element of the Policy. It is therefore suggested that Part B of Policy 2 is re-written to employ a more positive planning policy framework, whereby all applications for waste management facilities are required to consider whether wider benefits can be delivered. Our suggested wording is provided at Appendix 1.

**Question 65:** How does the spatial strategy and the proposed distribution of waste management facilities address the proximity principle and are strategic movements of waste justified? How have the transport implications for the proposed distribution of proposed allocated sites and ILAS been assessed? Is the distribution justified in this regard?

25. The principles of self-sufficiency and proximity are established in Article 16 of the Waste Framework Directive, wherein waste planning authorities are required to apply both principles when exercising their planning functions. Specifically, waste planning authorities should ensure that, as far as is practicable, sufficient waste disposal facilities and the facilities for the recovery of mixed municipal waste collected from households, exist within the plan area.

26. The approach is intended to reduce the environmental, social and economic costs and harm associated with the transportation of waste, by managing waste close to where it arises.

27. The PPG outlines that whilst the aim should be for waste planning authorities to manage their own waste arisings in full, there is no expectation that this will be entirely achievable. Moreover, there is no expectation that waste is handled in the absolute closest facility to the exclusion of all other considerations\(^{16}\).

28. In this regard, the Council is proposing to ensure that there is sufficient waste management capacity within the County to manage the existing and forecast quantum of waste produced\(^{17}\). In meeting this Strategic Objective, the Council will, in line with the proximity principle, achieve a net self-sufficient position.

29. The Memorandum of Understanding\(^{18}\) between the waste planning authorities within the South East Region acknowledges that whilst each authority will be planning for net self-sufficiency, there will be cross-boundary movements of waste. Such an approach is legitimate and receives support in national planning policy guidance\(^{19}\).

\(^{15}\) Para. 4 of the NPPW refers

\(^{16}\) Para. 007 Reference ID: 28-007-20141016

\(^{17}\) Strategic Objective 1 and para. 4.1.1.1

\(^{18}\) Memorandum of Understanding between the Waste Planning Authorities of the South East of England (April 2017)

\(^{19}\) Para. 007 Reference ID: 28-007-20141016
30. Consequently, there are likely to be strategic movements of waste, both within the County and to and from its neighbouring waste planning authorities. This is clearly, in the context of national planning guidance, an appropriate strategy and is therefore justified.

31. The Policy 11a allocations are intended to provide the certainty that adequate waste management capacity is identified to meet forecast needs\(^\text{20}\). The development of these sites for waste management purposes will ensure that in line with the proximity principle, net self-sufficiency is achieved.

32. In terms of distribution, the SWLP allocates six sites for new waste management purposes\(^\text{21}\). The six sites are distributed in 6 of the 11 local authority areas within the WPA area. Such a broad distribution rightfully recognises the polycentric nature of the County. Once the ILAS are included, the Plan identifies at least one potential site for each Borough/District. It therefore provides a portfolio of sites that are well located in relation to the County’s dispersed settlement pattern.

33. In addition, one of the ‘key building blocks’ of the spatial strategy is to ensure that each site is well located to transport links\(^\text{22}\). In doing so, the Plan advocates a network of connected sites to enable the management of waste. Given the dispersed settlement pattern in the County, this is an appropriate and justified strategy.

34. The implications of this distribution have been considered within the SWLP’s Transport Study (July 2018). The purpose of the Transport Study was to assess in these terms the suitability of the proposed Policy 11 sites. The work assessed the impacts of various forms of waste management facilities at nine sites, comprising the six sites proposed for allocation, plus three additional sites that were allocated within the 2008 WLP, but are not carried forward.

35. The Transport Study found all 9 sites to be suitable for accommodating waste management uses; demonstrating that the transport implications of the proposed distribution of the Policy 11 allocated sites have been considered and found to be justified.

36. However, it is noted that the Study did not assess the transport implications of the ILAS. Accordingly, at this stage, the transport implications of the proposed distribution of the ILAS have not been assessed. Accordingly, and absent this, there can be no certainty that together with other identified sources of supply, the distribution of the ILAS is justified.

37. This further reaffirms our response to Question 64, where we demonstrate that the Policy 11 allocations should be afforded a priority over the ILAS because they provide the necessary certainty that the County’s existing and future waste management needs will be met in full over the plan period.

38. Given the evidence before the Examination, and to ensure that the strategy is justified, there is a need to confirm the primacy of the Policy 11 allocations in meeting the County’s existing and future waste needs. It is only these sites for which the Plan’s evidence base has demonstrated could deliver in the Plan period and in a technically sound manner, including in terms of transport.

\(^{20}\) Para. 3.3.3.2 of the Council’s ‘Delivering the Spatial Strategy’ Background Paper (April 2019)

\(^{21}\) Policies 11a and 11b

\(^{22}\) Para. 4.1.1.1 of the emerging SWLP
39. We discuss the transport implications for Lambs Business Park in our responses to Matters 5 and 7.

**Question 66: Does the SWLP include sufficient information on the location criteria for site identification? Does it meet European reporting requirements for waste management plans to show existing and proposed waste management sites on a geographical map, and/or include sufficiently precise locational criteria for identifying such sites? (PPG ID: 28-039-20141016)**

40. National guidance requires Waste Local Plans to identify on a Policies Map, clearly defined allocated sites and/or areas of search that are identified to meet needs over the plan period. Waste planning authorities are also required to show the location of existing waste management sites on a geographical map.

41. Figure 1 of the emerging Local Plan provides a map which identifies the location of all the Policy 11 allocated sites and the ILAS. In addition, more detailed mapping of each site and ILAS is provided in the Part 2 Plan.

42. We understand that at present there isn’t a comprehensive plan that identifies all the existing waste management sites within the County and the proposed allocations and ILAS, but that the Council will be providing one in due course.

**Question 67: Is the spatial strategy consistent with national planning policy in respect of development within the Green Belt? To be effective, should the spatial strategy clearly indicate 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. For effectiveness, should the interrelationship between the Spatial Strategy, Policy 2, Policy 9 and Policy 10 be clearly explained within the Plan?**

43. The NPPW confirms that whilst Green Belts have a special protection, the protection afforded to them does not, as a matter of principle, preclude the development of land within the Green Belt for waste management purposes. When preparing Local Plans, waste planning authorities, working collaboratively with other planning authorities, should first look for suitable sites and areas outside the Green Belt that could accommodate waste management facilities, that, if located within the Green Belt, would be inappropriate development.

44. In addition, para. 137 of the NPPF confirms that once established, Green Belt boundaries should only be altered where exceptional circumstances are demonstrated through the preparation of a local plan.

45. Before concluding that the exceptional circumstances exist to justify alterations to Green Belt boundaries, the strategic authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified needs for development. Such considerations will include:

- Making use of as much suitable brownfield and underutilised land;
- Optimise the density of development; and
- Be informed by discussions with neighbouring authorities about whether they can accommodate some of the identified needs for development. This will be demonstrated through Statements of Common Ground.

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23 Para. 039 Reference ID: 28-039-20141016 of the NPPG
24 Para. 6 of NPPW
46. The evidence base supporting the Local Plan has assessed various potential sources of supply that could contribute to meeting the identified need, including improvements and extensions to existing facilities. However, there is no certainty, particularly given the planning policy and environmental constraints concerning these existing sites referred to earlier, that they will be able to provide any additional capacity.

47. In addition, the WPA also assessed the suitability of existing employment sites across the County to provide new waste management facilities and concluded that "due to commercial and practical considerations and competition from other land uses, such land cannot be wholly relied on to deliver the required waste management capacity over the Plan period."  

48. Such a conclusion is also supported by historic delivery rates of new waste management capacity. Evidence prepared by the WPA has demonstrated that a limited quantum of capacity from industrial estates and other industrial and employment land has been delivered between April 2008 and March 2017 (just 3%). Consequently, the WPA conclude that such land "may only be relied upon in the new SWLP to a limited extent".

49. The WPA have also discussed the ability of neighbouring authorities to accommodate some of the identified needs for development. As outlined in the Memorandum of Understanding between the Waste Planning Authorities of the South East of England, each WPA is planning on the basis of providing sufficient waste management facilities to be net self-sufficient, in-line with the proximity principle. Moreover, none of the WPAs are planning on the basis that additional provision has to be made to account for unmet needs from a neighbouring authority (para. 7.2 refers).

50. Consequently, it is only through the allocation of specific sites that there is certainty that County’s waste needs will be met over the plan period. Such certainty is required to ensure that the SWLP is sound.

51. Having established a legitimate need to identify specific and deliverable allocations, the Council undertook a site evaluation process which concluded that without the allocation of Green Belt sites, the County’s waste management needs could not be met. This is also reflected within paras. 4.3.2.3 and 5.3.3.2 of the Part 1 SWLP.

52. Accordingly, the exceptional circumstances have been demonstrated to justify the allocation of land that is within the Green Belt for new waste management facilities. The identification of Green Belt sites within the spatial strategy is therefore consistent with national planning policy in respect of development within the Green Belt.

53. Having identified the need for development in the Green Belt, para. 5.3.3.9 of the SWLP Part 1 identifies that the WPA will encourage the County’s Boroughs and Districts to consider making appropriate alterations to their Green Belt boundaries, as their respective local plans are reviewed. As is shown in the case of Lambs Business Park, which is identified for allocation and removal from the Green Belt.

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25 Para. 3.1.4.1 of the WPA’s Report on Delivering the Spatial Strategy
26 Para 5.3.3.3 of the SWLP Part 1
27 Para. 4.2.2 of the Delivery of Waste Management Capacity in Surrey 2008 – 2017, October 2018 refers
28 Para. 7.2 of the Memorandum of Understanding between the Waste Planning Authorities of the South East of England (April 2017)
29 Section 4.4 of the Site Identification and Evaluation Report (April 2019)
Metropolitan Green Belt in the Submission Tandridge Local Plan (Policy SES003 refers), this is already working.

54. However, in order to make such alterations, the County’s District and Boroughs will require the certainty that the allocated sites within the Green Belt are required to meet waste management needs over the plan period. Without the necessary level of certainty, it is unlikely that each local planning authority would be able to demonstrate the exceptional circumstances exist to remove land from the Green Belt in the manner proposed. In our response to Question 63 we have identified that the framework provided by Policies 2 and 10 creates ambiguity as to whether the allocated sites will be required. This could undermine the ability of the District and Boroughs ability to demonstrate that the exceptional circumstances exist to remove each site from the Green Belt. Our suggested policy amendments provided at Appendix 1 would remedy this issue.

**Question 68: Is Policy 9 consistent with other adopted and emerging development plans within the area covered by the SWLP? Is the location of proposed allocations within the Green Belt justified? Does the evidence demonstrate an inability to identify sufficient, suitable, opportunities for waste management facilities on land outside the Green Belt?**

55. At present, Lambs Business Park is located within the Metropolitan Green Belt and would therefore be subject to Policy 9 of the SWLP.

56. However, the site is identified as a strategic employment site within the emerging TDCLP (Policy SES003 refers). Within the Policy, the Council confirm that the exceptional circumstances exist for Lambs Business Park to be removed from the Metropolitan Green Belt. The emerging Policy also acknowledges the suitability of the western area of the site to accommodate a new waste management facility. This is also stated in the Statement of Common Ground between Tandridge District Council and Surrey County Council.  

57. Accordingly, it can be concluded that the site’s allocation in Policy 11a of the SWLP is entirely consistent with the emerging TDCLP and its allocation is justified.

58. As identified within our response to Question 67, the WPA's site selection process considered a range of sources that could contribute to meeting the County’s identified needs. However, for the reasons set out in our responses to previous questions, there is no certainty that these sites will deliver any new waste management capacity.

59. As required, the WPA has discussed the potential of neighbouring authorities accommodating some of its identified needs. However, the Memorandum of Understanding between the Waste Planning Authorities of the South East of England (April 2017) confirms that each waste planning authority is planning on the basis that no provision has to be made within each waste local plan to meet unmet needs of neighbouring authorities (para. 7.2 refers).

60. Consequently, it is highly unlikely that any of Surrey's waste needs will be met out-of-County, in neighbouring authorities.

61. Given the analysis presented above, there is a need to identify specific and deliverable sites within

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30 Para. 6.8 of Core Document SWLP26  
31 Para. 137 of the NPPF
the County. This WPA’s site selection process is identified within their Site Identification and Evaluation Report. The methodology employed sought to apply a ‘sieving’ process to identify the most suitable sites.

62. Scenario 1, which applied all the secondary sieves in parallel, including the exclusion of sites that are located within the Metropolitan Green Belt (Sieve G), only resulted in 1 site as being sufficiently unconstrained to be considered for allocation within the SWLP (Site WA29). However, the site was found to have a lack of underutilised land and it was within close proximity to a number of sensitive receptors. Accordingly, it was not recommended for allocation.

63. The second assessment stage, Scenario 2, applied the application of five of the secondary sieves in parallel, but excluded land status. Four sites were found to be sufficiently unconstrained to be considered for allocation. On further analysis, only one site was found to be available for allocation (GU23 – Land to the north of Slyfield Industrial Estate, Guildford), which is identified within the Slyfield Area Regeneration Programme and is required to accommodate the relocation of existing facilities. Accordingly, it was considered that the site has limited scope to provide additional waste management capacity to meet needs.

64. Consequently, it was rightly concluded that without identifying land within the Green Belt for allocation, there would be a lack of sufficient, suitable and deliverable opportunities for waste management facilities outside the Green Belt to meet identified needs. It is only once sites within the Green Belt are included within Scenarios 3 and 4, that a sufficient portfolio of deliverable sites can be identified to meet needs. Exceptional circumstances therefore exist to justify the allocation of land within the Green Belt for new waste management purposes. This is a justified approach and ensures that the SWLP will be effective.

65. Were the SWLP to have identified a portfolio of sites that did not meet identified needs, it could not be considered as being positively prepared, justified or effective and it would therefore be an unsound proposition.

**Question 69: Does the wording of Policy 9 make it sufficiently clear that, even for proposed allocations, to be considered acceptable, waste development in the Green Belt would need to demonstrate very special circumstances exist? To be consistent with national planning policy, should the policy refer to the factors identified as those that may contribute to ‘other considerations’? To be justified, should the policy clarify that those factors are indicative, with each proposal considered on its merits?**

66. As indicated in our responses above, we consider that the primacy of the Policy 11 allocated sites should be clearly articulated in the SWLP’s policy framework. Such an approach is entirely consistent with the plan-led system required by planning law and national planning policy.

67. That said, it is acknowledged that, depending on their individual characteristics and circumstances, it is likely that the development of new waste management facilities on sites allocated within the Metropolitan Green Belt, would constitute, in the context of para. 145 of the NPPF, inappropriate development. Consequently, in line with para. 143 of the NPPF, applications on such sites would

32 see para. 4.2.3.1 of the Site Identification and Evaluation Report
need to demonstrate that ‘very special circumstances’ existed to justify approval.

68. In making a planning judgement on a planning application in such a circumstance, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will only exist if the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal, is clearly outweighed by other considerations.33

69. It is considered that these requirements are adequately reflected within the first paragraph of Policy 9.

70. The factors that are identified within Policy 9 that may contribute to demonstrating very special circumstances are welcomed, but it should be acknowledged that this is not an exhaustive list. Accordingly, these factors should be considered as being indicative and each application should be determined on its own merits.

71. In regard to the first ‘factor,’ as identified in our responses to earlier questions, to accord with the plan-led system, a priority should be afforded to meeting the County’s identified need for new waste management facilities on the allocated sites. It is these sites which have been identified as being the most suitable and deliverable.

72. Sites within the ILAS and previously unidentified sites should only be brought forward if the allocated sites fail to come forward, or there is an additional need for waste management facilities.

**Question 70:** The evidence indicates that sites within the Green Belt allocated in the current Waste Local Plan, such as former Weylands STW, have faced issues with their proposed development, due in part to their location within the Green Belt. Given this, what confidence does the Council have that the proposed allocations are likely to be effective in delivering waste development?

73. As identified above, WT Lamb, have been working collaboratively with the WPA and Tandridge District Council to bring forward a comprehensive proposal to redevelop the site.

74. As a result, the site has been identified for allocation in both the emerging SWLP (Policy 11a) and within the submission version of the TDCLP (Policy SES003 refers).

75. Whilst there is recognition in both emerging Plan’s evidence base that the site is located within the Metropolitan Green Belt, both planning authorities have demonstrated that the exceptional circumstances exist to allocate the site. In the case of Tandridge District Council, their evidence base also demonstrates that the exceptional circumstances exist to warrant the site’s removal from the Metropolitan Green Belt. This is reflected in the emerging policy context for the site (Policy SES003 refers).

76. The Statement of Common Ground agreed between Tandridge District and the WPA confirms that the site is proposed to be removed from the Metropolitan Green Belt through the emerging Tandridge Local Plan. In addition, the Statement of Common Ground also confirms that:

- The site is potentially suitable for a large-scale waste facility, handling in excess of 120,000 tonnes of waste per annum;

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33 Para. 144 of the NPPF confirms
• It is potentially suitable for a range of differing waste management uses, potentially associated with energy recovery;
• Proposals that seek to utilise the existing railway network and siding will be encouraged;
• Any surplus heat from the proposed development should serve the South Godstone Garden Community and the existing and proposed operations within the Business Park.

77. There are no areas of disagreement between both planning authorities in relation to Lambs Business Park.

78. Together with the evidence base supporting both emerging Plans, the Development Framework Document, which is appended to our Matter 5 Participant Statement, confirms that a new waste management facility on the site, in combination with other planned development in the wider area, can be delivered in a technically sound manner. Its allocation in Policy 11a is therefore justified and will be effective in delivering new waste management capacity within the County.

LRM Planning
August 2019
Appendix 1 – Suggested Amendments to Policy Wording

Policy 2 – Recycling and Recovery (other than inert C, D & E and soil recycling facilities)

A. Planning permission for the development of recycling or recovery facilities (other than inert C, D & E and soil recycling facilities) and any associated development will be granted at the following locations and in the following priority order:

i) The site is allocated in the Surrey Waste Local Plan for waste development (Policy 11).

ii) The activity involves the redevelopment of a site, or part of a site, in existing waste management use.

iii) The site is otherwise suitable for waste development when assessed against other policies in the Plan.

B. Applications for new development of waste recycling and recovery activities co-located with other waste and non-waste development will be supported where it can be supported by evidence to demonstrate that there are potential benefits from the colocation of the proposed waste use with other waste and non-waste uses has been considered. Such benefits which may include:

i) More efficient production, in terms of quantity or quality, of recyclate and waste derived fuels.

ii) Fewer lorry movements would be required as a result of co-location.

iii) An additional beneficial use is associated with waste recycling and recovery operations at the site e.g. efficient contribution to an energy network.

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 and in the following priority order:

i) Sites allocated under Policy 11a – Strategic Waste Site Allocations or


iii) On land identified as an ‘Industrial Land Area of Search’ as shown in the policies maps.

iv) On any other land identified for employment uses or industrial and storage purposes by district and borough councils.

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

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