Surrey Waste Local Plan
Examination

Matters Statement: Matter 7 Transport and connectivity (Policy 15)

23 August 2019
**Issue:** Whether the policies and proposals of the SWLP demonstrate that options for sustainable transport are supported and waste movement by road is minimised as far as practicable?

134. How has the potential cumulative impact of transport movements on the strategic road network (SRN) been assessed? What impact will the policies and proposals of the SWLP have in this regard?

**Council’s Response:**

**How has the potential cumulative impact of transport movements on the strategic road network (SRN) been assessed?**

134.1 The *Transport Study for the SWLP (SWLP 19)* assesses the suitability of the allocated sites for waste related development in terms of potential transport impacts. It assesses a range of issues, including the suitability of the access to each site, the current and potential traffic flows in the vicinity and it provides an indication of where cumulative impacts could arise from waste related development and other development proposed nearby (typically noted in paragraph X.3.3 and X.3.4 of each section).

134.2 The potential cumulative impact of development at the sites proposed for allocation on the SRN has not been assessed quantitatively by Surrey County Council (the Council) but the *Transport Study (SWLP 19)* has identified that, development of each site is not likely to result in significant adverse impacts, with varying degrees of mitigation. Full assessment of the cumulative impact of waste related development at each allocated site on the SRN is extremely difficult at the plan making stage, owing to the uncertainty around the type and scale of development that could come forward at each site, accordingly this is best assessed at the project stage.

**What impact will the policies and proposals of the SWLP have in this regard?**

134.3 The implementation of Policies 14 and 15 at the project stage will ensure that the cumulative transport impacts of development at any of the sites on the SRN is fully considered and proposals likely to result in significant adverse impacts will not be permitted.

134.4 Assessment of the cumulative impact of any proposal is also a requirement for the Planning Statement that should be submitted for all planning applications (see the Council’s *Local list for the validation of planning applications, SWPS-11*).
134.5 It is anticipated that the policies and proposals of the SWLP will not have a significant adverse impact on the highways network, including the SRN, due to the nature of the policies contained in the SWLP. In their Regulation 19 representation on the SWLP, Highways England (Rep ID 65) were supportive of the policies included in the plan and raised no objection to any of the sites proposed for allocation.

135. How are any adverse impacts on the SRN and local roads proposed to be minimised? How does Policy 15 ensure that this will be effectively managed and controlled? To be effective, should the policy refer to the potential need for Traffic Management Plans and Transport Assessments to support development proposals? Similarly, should the supporting text clearly identify the extent, type and method of assessment required?

Council’s Response:

How are any adverse impacts on the SRN and local roads proposed to be minimised?

135.1 Significant adverse impacts on the SRN and local roads will be prevented through the application of Policy 15.

How does Policy 15 ensure that this will be effectively managed and controlled?

135.2 Policy 15 states that where the need for road transport has been demonstrated “vehicle movements will not have a significant adverse impact on the capacity of the highway network” and “vehicle movements associated with the development will not have a significant adverse impact on the safety of the highway network”. In order to demonstrate this, proposals will need to supply evidence.

Should the policy refer to the potential need for Traffic Management Plans and Transport Assessments to support development proposals?

135.3 SWLP Part 1 para. 5.5.1.2 indicates the potential need for Traffic Management Plans and Transport Assessments.

135.4 The Council’s Local List for the validation of planning applications (SWPS-11) contains specific detail of when a Construction Traffic Management Plan, Traffic Statement and/or Transport Assessment will be required and the required content of these documents as well as why these documents are required and associated guidance. This information can be found in Local List, Annex 2 – Waste Related Development, Table 6 “Traffic and Highways”.

Page 3 of 7
Matter 7: Transport and Connectivity (Pages 134-137)
Should the supporting text clearly identify the extent, type and method of assessment required?

135.5 Paragraph 2.2.2.3 of SWLP Part 2 recommends that the conclusions of the technical assessment reports (including the *Transport Study (SWLP 19)*) are referred to and considered when applications are made. The Council has sought to include specific issues identified in the *Transport Study (SWLP 19)* in relation to the allocated sites as ‘key development issues’ associated with each of the sites (see Sections 5.1 to 5.6). The Council is proposing an additional change to the key development issues in SWLP Part 2 Section 5.5 (Lambs Business Park site allocation) (*SCCD-02*) to better reflect the results of the *Transport Study (SWLP 19)*.

136. Is the wording of Policy 15 B(vi) consistent with paragraph 109 of the NPPF, where it seeks to avoid unacceptable impacts on highway safety, or severe residual cumulative impacts on the road network?

**Council’s Response:**

136.1 Yes. Policy 15 B (vi) is consistent with NPPF para. 109.
136.2 It is noted that the Policy is positively worded in line with NPPF para. 16 b).
136.3 “Significant adverse impact” was used rather than “unacceptable impact” to ensure internal consistency between policies in the plan.
136.4 The Plan is consistent with the second part of NPPF para. 109: “… the residual cumulative impacts on the road network would be severe.”. Policy 14 B ix) states that planning permission for waste development will be granted where it can be demonstrated that it would not result in significant adverse impacts on communities and the environment, which includes “Cumulative impacts arising from the interactions between waste developments, and between waste development and other forms of development”.
136.5 The Council’s *Local List for the validation of planning applications (SWPS-11)* identifies that cumulative effects of the proposed development alongside other existing or permitted development in the vicinity are expected to be assessed as part of any planning application, this information is required to be included within the Planning Statement.
137. Proposed allocations A(i), B(i), B(ii) and B(ii) (Part 2 sites 5.1, site 5.2, site 5.3 and site 5.4) have identified a need or a potential need for highway improvements to facilitate delivery of the development proposed. Is there a reasonable prospect that these improvements will be delivered, including in relation to viability, feasibility and potential impacts on the SRN? What is the anticipated timescale for this work?

Council’s Response:

137.1 It is considered by the Council that there is a reasonable prospect that highway improvements will be delivered, including in relation to viability, feasibility and impacts on the SRN. In some cases modifications are proposed to ensure there is a consistent approach across the allocations (this includes allocation C (i) Land at Lambs Business Park.). The table below describes potential highway works at each allocation and any proposed modifications to the Key Development Issues. The need for and design of mitigation will need to be assessed at the planning applications stage informed by a transport assessment:

<table>
<thead>
<tr>
<th>Allocation</th>
<th>Highway improvements identified in SWLP Part 2</th>
<th>Further detail</th>
<th>Proposed modifications to Key Development Issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>A(i) Land to the north east of Slyfield Industrial Estate</td>
<td>The junction of Moorfield Road and the A320 may require improvements</td>
<td>Replacement waste facilities on an approximate like for like basis may be accommodated (as is proposed) but any development that generates significant additional traffic may require some improvements to this junction. However – waste uses do not typically generate significant additional peak time traffic, which would potentially reducing the need for mitigation. Improvements could comprise new signal technology.</td>
<td>None proposed</td>
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<tr>
<td>B (i) Former Weylands Sewage Treatment Works</td>
<td>Any new development should include a new access via Lyon Road</td>
<td>The land required for a new access is within the same ownership. Previous proposals have demonstrated that a new access can be satisfactorily accommodated via Lyon Road.</td>
<td>None proposed</td>
</tr>
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<td>B (ii) Land adjoining Leatherhead Sewage Treatment Works,</td>
<td>Appropriate improvements to the site access road and improvements at the junction of the A245 Randalls Road and Oaklawn Road.</td>
<td>Appropriate improvements, if needed, will most probably amount to improvements to junction geometry within the extent of land within the existing highway.</td>
<td>For clarity, add after ‘site access road’ (including its junction with the A245 Randalls Rd).</td>
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<tr>
<td>B (iii) Oakleaf Farm, Stanwell Moor</td>
<td>The site is likely to be able to accommodate medium sized facility types. If suitable mitigation can be implemented, by allowing all movements at the Horton Road/Stanwell Moor Road junction, a larger facility may be accommodated.</td>
<td>Access to the site is via Horton Road from the A3044 (which links to the M25). The junction with the A3044 is left in and left out. Significant intensification of use of the site would likely require improving the junction of Horton Road with the A3044 to allow all movements. The left in and left out arrangement at the A3044 junction can be an incentive for drivers of HGVs to use a route through Stanwell Moor village. It is imperative that any additional site traffic is discouraged from using routes through Stanwell Moor village. This could be achieved by changing the junction geometry of the site access road and/or the above improvements at the Horton Road/A3044 junction.</td>
<td>Add the need to route traffic away from Stanwell Moor village: The site is likely to be able to accommodate ..........Horton Road/Stanwell Moor Road junction, a larger facility may be accommodated. Site traffic must be discouraged from using the route through Stanwell Moor Village.</td>
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<tr>
<td>C (i) Land at Lambs Business Park</td>
<td>Medium size unless rail sidings can be utilised. Proposals that seek to utilise the existing rail network and siding in order to support sustainable transport patterns will be encouraged.</td>
<td>Road access to Lambs Business Park is restricted for environmental reasons (housing fronting the site access road) and safety reasons (with a substandard junction between Tilburstow Hill Road and the A22). HGVs must access the site from the south via Tilburstow Hill Road due to the height restricted railway bridge. Any significant increase in HGV movements serving the business park by road is not likely to be acceptable. A large scale strategic waste use allocation is only justified due to the opportunity to use an existing siding and the rail network in accordance with Policy 15.</td>
<td>Replace the existing text in order to emphasise the importance of considering rail access. Transport by road is restricted with little opportunity to increase total HGV movements using the business park. Any large-scale waste use is therefore likely to require the reopening of the existing rail sidings in order to utilise the rail network.</td>
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</table>
137.2 The Council’s planning process deals with the delivery of any required highway improvements. In order for planning applications to be validated they must comply with the *local list* for the validation of planning applications (*SWPS-11*), which requires reports that would identify appropriate transport related mitigation for the development proposed (Construction Traffic Management Plan, Transport Statement and/or Transport Assessment).

137.3 Necessary highway improvements will be the responsibility of the developer to fund. These will normally be required to be completed before a facility is operational. Details will be submitted with the planning application and will be required by condition and, where offsite works are involved, secured through a Section 106 agreement. All works to the highway will need the agreement of the highway authority. This is secured by a Section 278 agreement which will include the funding and implementation timetable (all works on the highway are implemented by the highway authority).