Surrey Waste Local Plan Examination

Response by Runnymede Borough Council to the Inspector’s Matters and Questions (MIQs)

Matter 5

20 August 2019
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Appendices

Appendix 1: Aerial Photograph of Site 11b with Ancient Woodland Constraint
Matter 5: Allocations & ILAS

Issue: Whether the Industrial Land Areas of Search (ILAS) and the allocations are soundly based and provide sufficient flexibility to meet identified needs of the area for the management of waste?

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?

1.1 Policy 10 is not considered to clearly identify the hierarchical preference for the location of new facilities. Paragraph 5.3.2.5 of the SWLP Part 1 states that the plan prefers additional waste management capacity on suitable sites outside of the Green Belt however, Policy 10 specifically allocates the sites in Policy 11a and 11b which lie in the Green Belt and without reference to any very special circumstances being demonstrated, contrary to the NPPF.

1.2 This is an inconsistency in the Plan. To address this and make the plan sound, criterion i) of Policy 10 should be deleted and the other criteria re-ordered with a separate paragraph after the criteria confirming the proviso that barring any suitable alternative sites outside of the Green Belt being available at a time of demonstrated need, the allocations in Policies 11a and 11b will be supported where very special circumstances can be demonstrated (although Runnymede Borough Council still retain their objection to Policy 11b).

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?

1.3 Runnymede Borough Council does not consider that the site selection process has been open and transparent. In this respect, please see the Council’s response set out in its Matter 1 Statement with respect to the SA. With respect to the Site Identification and Evaluation Report (SIER) a summary of Runnymede’s Regulation 19 Representations are set out below for ease of reference: -

“Site Identification and Evaluation Report (SIER) assessed potential waste sites
through a sequential sieving process. Runnymede does not have any objection to the methodology itself.

Four different scenarios were considered for identifying potential waste sites. Scenario 3 did not apply the Green Belt sieve and scenario 4 did not apply Green Belt or Land Status sieves. At the end of the sieving process the SIER identifies sufficient land to meet needs under scenario 2. At the end of scenario 3 (which is sequentially preferable to scenario 4) and accounting for net capacity at Slyfield, 21.6ha is identified to meet a need for 12.04ha. Given this result, and the SWLP spatial strategy Runnymede does not consider that any further sieving exercise should have taken place and that scenario 4 was not required.

In applying scenario 4, the site at Trumps Farm (RU02C) was identified as one of 4 additional sites to those already identified in scenario 3. Of the 4 sites identified (RE09D, RU02C, RU04C, WO09), Appendix 2 of the SIER scores the sites identically against sieves G-J & L but sites RE09D and WO09 score better against sieve K (proximity to strategic transport network).

For each of the four sites, the same justification for not allocating is given as ‘The site is classified as Greenfield land and for this reason it is not recommended that the site is allocated in the emerging SWLP.’

As such, the Trumps Farm site was excluded from allocation in the Waste Authority’s own evidence with no reasoned justification for taking this site forward instead of others which are better performing.

Preference should therefore be given to one of the PDL sites identified in Policy 11a, if a need for an MRF can be demonstrated. Whilst these sites may be required to fill the capacity gap for ‘Other Recovery’, first preference should be given to use for an MRF given the principles of the waste hierarchy.

In terms of the proximity principle:

It is noted that in the supporting text to Policy 11b, Table 19 sets out the locations where DMR is exported to. This includes sites in Alton, Colnbrook in Slough and Leatherhead. From the Council’s mapping it would appear that these sites are in closer proximity to some of the major urban areas in the north-west of the County than Trumps Farm including: -

Runnymede Borough Council-Response to Surrey Waste Local Plan Matter 5
- **Staines upon Thames, Ashford and Sunbury-on-Thames in Spelthorne (closer to Colnbrook);**

- **Walton-on-Thames, Cobham, Oxshott and Esher in Elmbridge (Closer to Leatherhead) with Weybridge being a comparable distance between Leatherhead and Trumps Farm;**

- **Epsom, Ewell & Chessington in Epsom & Ewell (closer to Leatherhead);**

- **Guildford is a comparable distance to Leatherhead as Trumps Farm**

- **Godalming is a comparable distance to Leatherhead as Trumps Farm with Farnham closer to Alton.**

Given the proximity of Colnbrook to north west Surrey, it is considered that a site in this location is not the most appropriate to achieve the Proximity Principle and a site in the western side of the County where higher housing growth rates are proposed would be better placed to meet the Proximity Principle.

As such, the proposal for an MRF at Trumps Farm is not required for the Waste Authority to meet the Proximity Principle. Whilst Runnymede agree that the Waste Authority should aim to reduce or nullify the amount of DMR waste exported to areas outside of the County, it is not considered that the site at Trumps Farm fulfils this aim in terms of the proximity principle for areas likely to experience high growth rates.

1.4 The above sets out the proximity of locations in Surrey to waste sites within or just beyond the Surrey boundary. It should also be noted that site WO09 which was rejected, even though it performs better than Trumps Farm is also closer to locations such as Guildford, Farnham, Godalming, Weybridge, Walton-on-Thames, Cobham, Oxshott and Esher as well as areas within Runnymede such as Addlestone, Ottershaw and Woodham & New Haw. Again this demonstrates that other sites are better placed to meet the proximity principle as they will cover a far larger area of influence.

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?

1.5 Policy 11b proposes to allocate the Trumps Farm site for an MRF dealing with DMR.
The policy does not set out the quantum of development to come forward but this is stated in the SWLP Part 2 as 50,000tpa to 120,000tpa subject to mitigation. The site area given in the SWLP Part 2 is 6.2ha although as set out in the Council’s Regulation 19 representations this will be reduced by the presence of Ancient Woodland on site which is recognised in the SWLP Part 2. The site also benefits from a tree belt to its north boundary with the M3 (and motorway embankment) and west boundary with Kitsmead Lane which is likely to be beneficial to retain given the site’s Green Belt status. All of this reduces the site to a developable area of around 3ha. An aerial photo of the site showing potential developable area (in yellow) and areas of Ancient Woodland and their buffers (in red) is attached as Appendix 1.

1.6 The SIER Report (Document SWLP9) identifies in Appendix 3 that around 2ha are required to deliver a 50,000tpa recycling facility. As such, a 3ha site is unlikely to meet the capacity of 120,000tpa preferred in the SWLP, at least not without the substantial removal of the tree belt and/or ancient woodland that exists on the site.

1.7 Table 7 of document SWLP9 identifies 21.6ha suitable for waste development from sites allocated in Policy 11a (accounting for net capacity at Slyfield) which far exceeds the identified need for 12.4ha land requirement (para 4.4.1.1 of document SWLP9). All of the sites listed in Table 7 of document SWLP9 are proposed for allocation in Policy 11a and are of a size and scale (including the net capacity at Slyfield of 2.84ha) which would be able to accommodate the size and type of facility proposed in Policy 11b. Trumps Farm could not however accommodate a recycling facility of this scale without significant impact on the tree belt and ancient woodland which exist on the site. Further, the sites in Policy 11a such as Weylands Treatment Works or Oakleaf Farm are larger than Trumps Farm and have the potential to accommodate a larger 120,000tpa facility which is better located in terms of the proximity principle.

1.8 The SWLP Part 2 does not set out the type of waste facility that the Weylands and Oakleaf Farm sites could accommodate, although it suggests that they could come forward for thermal treatment facilities. However, given the need to drive waste up the waste hierarchy (specifically acknowledged in Strategic Objective 2 of the SWLP Part 1), with paragraph 5.1.1.4 committing to the County’s promotion of recycling capacity ahead of other recovery, there is no reason why these sites could not facilitate a DMR of the size anticipated by Policy 11b. As such, the Trumps Farm
allocation in Policy 11b is not required to meet need for a DMR as there are other more sequentially preferable sites available. As such, to make the Plan sound Policy 11b should be deleted along with any reference on the Policies Map.

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?

1.9 Runnymede Borough Council does not believe that the evidence demonstrates the allocation is justified for the reasons set out in its response to Q11 (Matter 1 Statement), 76 & 113 above.

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)?

1.10 In comparison to other sites Runnymede Borough Council does not consider that the Trumps Farm allocation is justified, clear or robust, for the reasons set out in answers to Q11 (Matter 1 Statement and its Appendix 1) 76 & 113 above.

1.11 In relation to the Strategic Road Network (SRN), the proposed allocation in Policy 11b is not the most accessible. This is demonstrated by both document SWLP9 in its assessment of sites and in document SWLP19, which states that of all the sites tested, Trumps Farm is the furthest from the SRN at 6.75km and congestion in the vicinity of the site causes large delays on the SRN route. Given this conclusion, and the prospect for a number of large residential led developments near the site proposed for allocation through the Submission Runnymede Local Plan 2030 (currently at EiP), the Transport Assessment recommends only small sized facilities (under 50,000tpa). Runnymede Borough Council is of the view, aligned to its response to Q113, that a facility of 50,000tpa (which is all Trumps Farm could support) could be accommodated on alternative sites in closer proximity to the SRN. (RE09D, RU04C, WO09 or other sites identified in Policy 11a).
1.12 Should the Inspector conclude however, that the site at Trumps Farm should remain as an allocation in the SWLP Part 1, Runnymede Borough Council would urge the Inspector to ensure that impacts to the local and strategic road network are mitigated especially to the A320 corridor which leads to J11 of the M25. Runnymede Borough Council has undertaken extensive evidence studies on this highway corridor through a series of Transport Assessments and Corridor Studies. Highways England has also objected to the Runnymede Local Plan regarding the capacity of J11 of the M25 to accommodate Local Plan growth and the Council are still in discussion with Highways England to remove this objection. The Transport Assessment for the Runnymede Local Plan found that without mitigation the impact of traffic generated due to Local Plan growth and cumulative levels outside the Borough on the A320 corridor was likely to result in severe impact to the junction around St Peter’s Hospital, Chertsey.

1.13 Following this conclusion the Council commissioned Arcadis to undertake an A320 Corridor Study to determine the extent of impact and whether any mitigation could reduce the impact from ‘severe’. The Arcadis reports have concluded that mitigation is possible and physical improvements along the corridor are required at a cost of around £44m. The mitigation identified for the A320 is also the subject of a bid to the Housing Infrastructure Fund (HIF) with Surrey County Council awaiting determination as to whether the bid has been successful. However, even if the bid should be successful, government will expect an element of clawback through developer contributions from all schemes that are dependent upon improvement of the A320 corridor, including the improvement works to M25 J11.

1.14 This A320 Corridor has been the subject of extensive debate during the Runnymede Local Plan EiP and work by Arcadis is ongoing with the final stage of hearings due to commence on the 14th November 2019 to discuss this single issue.

1.15 Given the above, Runnymede Borough Council would request that if the allocation is retained, to ensure it is sound Policy 11b should include reference to address the cumulative impact of any development on the local and strategic highways network and mitigate impacts to acceptable levels and where necessary contribute to improvements on the A320. This has been set out in each of the Runnymede Local Plan housing allocations dependent on the A320 improvement scheme and likewise, should be added to Policy 11b and read as: -
"Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site specific Travel Plan and Transport Assessment. Given the expected impact of development at the site on the A320, proportionate financial contributions to deliver relevant mitigation will be required."

1.16 The timing of allocation sites in the Runnymede Local Plan affected by the A320 have also been made subject to delivery of necessary mitigation. Runnymede would therefore request to ensure soundness, that if the allocation is retained it should not come forward before any mitigation works on the A320 have been completed. This would ensure a consistent approach to corridor mitigation across both the Local and Waste Plans.

1.17 Evidence on transport and the A320 Corridor underpinning the Runnymede Local Plan can be found on the Council’s website at https://www.runnymede.gov.uk/article/16273/Runnymede-2030-Local-Plan-Examination- specifically documents RBCLP44 (HIF bid), RBCLP45 (M25 Traffic Impact Assessment Note) and RBCLP47 (Strategic Highways Assessment 2019). Transport and A320 evidence at the time of Local Plan submission can be found at https://www.runnymede.gov.uk/article/16139/Runnymede-2030-Submission-Local-Plan specifically documents SD_015C to H.

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?

1.18 Should the allocation be retained, Runnymede Borough Council considers that such cross references are required for clarity and effectiveness, given that at the moment Policy 11b reads as a presumption in favour of an inappropriate form of development in the Green Belt.

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?
1.19 Runnymede Borough Council has no comments to make on the availability of the Trumps Farm site.

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?

1.20 Runnymede Borough Council does not have an objection to the way in which the site impacts have been assessed through the SA and HRA or the findings of the SA/HRA. However, the Council would reiterate that the assessment and findings of the SA have not considered the performance of sites against one another and therefore there is no justification for why the Trumps Farm site is taken forward and others rejected. As such, the SA does not support the allocation of the site given that other sites perform better in the SA process with no clear justification why they were rejected.

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?

1.21 Runnymede Borough Council considers that cumulative traffic impacts have been assessed through the Transport Study (SWLP19) and has no objection to the Transport evidence in this respect. The Air Quality Impact Assessment (SWLP 15) does not consider the type of facility proposed at Trumps Farm although this has been considered in the SA.

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?

1.22 Whilst Runnymede have no comments on the Transport Impact Assessment please see response to Q115 in relation to potential impact on the A320.

121. Is the Council confident that the development of the site would be able to meet the requirements of Policy 14 of the SWLP, including in relation to the potential impacts on areas of ancient woodland, the potential archaeological importance of the site, other aspects of the environment, and local communities? How has this been assessed?

1.23 Please see Runnymede’s response to Q11 in its Matter 1 Statement.

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?

1.24 As set out in Runnymede's response to Q11 in its Matter 1 Statement any application will need to demonstrate ‘wholly exceptional reasons’ for any loss or deterioration of the ancient woodland on site and there is no guarantee this will be demonstrated or the impact avoided/mitigated or compensated to the satisfaction of the nature conservation body (Natural England). This again brings into question whether there is a reasonable prospect of resolution.
Appendix 1 – Aerial Photograph of Site 11b with Ancient Woodland Constraint

Site shown edged in yellow with Ancient Woodland constraint and its buffer edged in red