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

Matter 5: Allocations and ILAS
On behalf of SMECH Management Company
Ltd
Incorporating work from PFA Consulting

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

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## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.0</td>
<td>Introduction</td>
<td>1</td>
</tr>
<tr>
<td>1.0</td>
<td>Response to Matter 5: Allocations and ILAS</td>
<td>2</td>
</tr>
</tbody>
</table>
0.0 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 5 of the Hearings Programme. This matter is in relation to Allocations and Industrial Land Areas of Search (ILAS).

0.2 DPDS has acted on behalf of SMECH Management Company Ltd since February 2013. DPDS has engaged in the Surrey 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 to the Surrey Waste Local Plan 2019-2033 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 the previous representations made at the Regulation 18 and Regulation 19 stages respectively. Hearing Statements have also been submitted on behalf of SMECH Management Company Ltd for Matters 1-4 and 6-8 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 5

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 DPDS accepts that there is an element of hierarchical preference for the location of new facilities set out in Policy 10, however the policy itself does not clearly indicate a preference for development on sites outside the Green Belt. Rather, any preference is consigned to the policy supporting text at paragraph 5.3.2.2 where it is stated that “the spatial strategy also seeks to prioritise the development of facilities on land outside of the Green Belt”. In any case, despite this prioritisation, Green Belt sites have indeed been proposed as allocations for new facilities in the SWLP.

1.2 DPDS are of the view that insufficient consideration has been given to assessing the suitability of Green Belt sites during the site selection process. We believe that an additional level of scrutiny is required in this respect, which is to consider the quality of Green Belt land proposed for allocation and how well the land performs in terms of the Green Belt functions defined in the NPPF (para 134).

1.3 With specific regard to the Green Belt site allocation at Land adjacent to Trumps Farm, Longcross it should be noted that the site is not proposed to be removed from the Green Belt in the submission Runnymede Local Plan 2030 (RLP 2030) which is currently undergoing examination. This is supported by the evidence base for the RLP 2030, specifically the RBC Green Belt Review Part 1 (2014) and Part 2 (2017), which identifies the area that Trumps Farm is located within (General Area 22) as performing a highly valuable Green Belt function.

1.4 In comparison, the alternative Green Belt site consideration for waste development at Lyne Lane Sewage Treatment Works, Chertsey was assessed in the RBC Green Belt Review as not performing a highly valuable Green Belt function. There are also alternative sites outside Runnymede Borough considered for allocation within the SWLP which may be similarly assessed in Green Belt terms.

1.5 Overall, DPDS feel that whilst a hierarchy has been identified for assessing suitability of sites outside the Green Belt, due consideration has not been given to establishing a hierarchy for assessing sites within the Green Belt (notwithstanding the apparent prioritisation to avoid Green Belt sites). By considering assessment criteria such as quality of Green Belt land and ability to perform Green Belt functions, a more robust site selection would ensue and avoid allocation of highly performing Green Belt sites (such as Land adjacent to Trumps Farm, Longcross) for waste facilities when more suitable alternatives are indeed available in the County.

Q72. 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?

1.6 DPDS believe the sites allocated within the Green Belt will not be effectively delivered within the plan period, the plan will therefore fail to deliver the required capacity for waste management facilities.
facilities. Sites such as the Land adjacent to Trumps Farm will remain in the Green Belt despite being allocated in the SWLP as Runnymede BC do not intend to remove the site from the Green Belt in their submission Local Plan (currently undergoing examination). This is backed up by the fact that the site is currently allocated within the currently adopted Surrey Waste Plan 2008 (adopted March 2009), and has failed to come forward in the subsequent ten-year period. Other sites allocated within the Surrey Waste Plan 2008 which are located within the Green Belt have also failed to come forward, such as the Weylands STW site.

1.7 It is thus clear to DPDS that the SWLP has failed to allocate the appropriate sites, and have allocated sites which are unlikely to be delivered due to the severe constraint on development at these sites. The Land adjacent to Trumps Farm has been seen in the most recent Green Belt Review to be performing a highly valuable Green Belt function. For this reason, it will be even more challenging to demonstrate the Very Special Circumstances required to justify the site’s removal from the Green Belt. It is therefore believed the site at Trumps Farm will not be effective in contributing towards the delivery of the required capacity for Waste Management Facilities.

1.8 DPDS are under the impression that the site at Trumps Farm has been allocated in this plan because it was allocated in the previous plan. The evidence base provides no justification for the site’s continued allocation and there appears to be alternative sites which would be more suitable for allocation.

Q73. 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?

1.9 Overall DPDS consider there to be a distinct lack of clarity in the SWLP, particularly in relation to the need for proposals to comply with all policies and supporting text not just within the SWLP itself but also relevant overarching national and local policy and guidance. For example Policy 1 and Policy 14, while making reference to a whole range of potential constraints and designations of land (including Ancient Woodland, which is present of Land adjacent to Trumps Farm), do not make any specific reference to the need for proposals within the Green Belt to demonstrate Very Special Circumstances (as required by the NPPF).

1.10 DPDS feel that, as well as clarifying that compliance is required with Policy 1 and Policy 14, it should also be made explicitly clear in Policy 10 that proposals at sites such as the Land adjacent to Trumps Farm would need to demonstrate Very Special Circumstances due to their location in the Green Belt.

Q74. 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?

1.11 The SWLP claims that it provides sufficient opportunity to meet the identified capacity requirement for waste management provision, however on review it is clear that there is a significant reliance on the allocation of Land adjacent to Trumps Farm for the provision of a Dry Mixed Recyclables facility (Policy 11b). Although this is a clear identification of where provision of a certain type of waste facility will be provided, DPDS are not convinced this site is suitable
given the severe number of constraints which need to be overcome to ensure the deliverability of the proposed allocation.

1.12 There are a number of constraints to the delivery of a waste management facility at the Land adjacent to Trumps Farm identified both within Part 2 (Sites) of the SWLP and also identified by DPDS. Given the severity of some of these constraints it is anticipated that the site will not be capable of being delivered, as backed up by the site’s failure to come forward in the previous plan period. The site’s location within a part of the Green Belt which performs a highly valuable Green Belt function makes demonstrating Very Special Circumstances for its development/removal from the Green Belt a significant obstacle.

1.13 Additionally, the cumulative impacts of the site coming forward along with proposed/forthcoming strategic residential development at Longcross, Chertsey and Virginia Water (which have not been sufficiently acknowledged within the SWLP) could have substantial effects on the Strategic Road Network. As we have highlighted in our previous representations, Runnymede BC have failed to reach an appropriate conclusion regarding the highways mitigation in the area surrounding the site at Trumps Farm. This is not expected to be resolved until the Stage 3 Examination of the Runnymede Local Plan which is due to take place October 2019.

1.14 It is therefore unknown if these significant constraints on the site’s development (Green Belt and cumulative impact on the SRN) are, whether through appropriate justification or mitigation, capable of overcome resolved at all.

1.15 Given the reasons outlined above, it is not anticipated that the constraints upon the Land adjacent to Trumps Farm are capable of resolution. Given the site’s specific role within the delivery of the waste management provision as a Dry Mixed Recyclables facility it is not believed the identified capacity requirement is capable of being delivered by the submission SWLP. The Land adjacent to Trumps Farm should therefore be removed from the plan as it restricts the capability of the SWLP in the delivery of the identified capacity requirement.

Q75. 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?

1.16 The SWLP Part 2 (Sites and Areas of Search) for allocated sites only explicitly identifies whether an allocation would or would not be suitable for a thermal treatment facility, while the ILAS are afforded no identification as to the type of facility that would be suitable therein. Consequently the SWLP Part 1 (Policies) does not clearly cross-reference any type of waste management facility on the proposed allocations or ILAS, or indeed the capacity therein, in the relevant policies (namely Policy 11a) or supporting text.

1.17 The exception to this is the allocation at Land adjacent to Trumps Farm (SWLP Part 1, Policy 11b and SWLP Part 2, Policy 5.6), which is the only allocation explicitly identified for a specific type of waste facility (dry mixed recyclables facility) and a proposed capacity noted in the supporting text (albeit contradictory between SWLP Part 1 and 2). DPDS dispute both the soundness of this allocation and the proposed capacity of Land adjacent to Trumps Farm as discussed further under Q76 and Q77 below.
Q76. 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?

1.18 With specific regards to Land adjacent to Trumps Farm, DPDS do not consider the allocation of this site, or indeed the proposed capacity, to be sufficiently justified on a number of grounds.

1.19 The technical evidence base does not make it clear why the proposed allocation of Land adjacent to Trumps Farm has been allocated for a MRF nor is it clear that any alternative sites have been considered for a specific MRF use. The site was not recommended for allocation within the Site Identification and Evaluation Report (2019) and there is no assessment of the site within the evidence base which makes a justified case for the site’s inclusion in the plan. Despite this, it has been allocated for what we consider to be “inappropriate development” within the Green Belt. We consider that a proposal on the site will not be capable of demonstrating “very special circumstances” as required by the NPPF and Policy 9 of the Submission SWLP.

1.20 With regards to the proximity principle, Paragraph 5.3.4.8 of the Submission SWLP states:

“the existing Leatherhead MRF is well located to serve the WCAs towards the south east of the county, and so, in accordance with the proximity principle, the second MRF should be located towards the north west of the county.”

1.21 Although we do not object to this proximity principle, it is not clear from the evidence base why another MRF is required just 17 miles by road from the Leatherhead MRF. We consider that the existing MRF is located towards the centre of the county rather than towards the south east.

1.22 In transport terms, the allocation of Land adjacent to Trumps Farm clearly contradicts SCC’s own evidence set out in Section 7 of the SWLP Transport Study (July 2018) and completely ignores the cumulative impact that the allocation, alongside forthcoming strategic residential allocations in Runneymede Borough, would have on the SRN. There is also contradiction in terms of the proposed capacity of the site, with the Transport Study identifying 50,000tpa as suitable given the current highways infrastructure but the supporting text for Policy 11b (5.3.4.10) identifying an increased capacity of 120,000tpa. This ignores and makes light of the fact that such capacity is wholly dependent on suitable highways mitigation which, as discussed in Q74, is a significant distance from being agreed by all relevant parties.

1.23 Overall, DPDS believe that the allocation of Land adjacent to Trumps Farm is simply a roll-forward of the previous SWLP 2008 allocation, without robust consideration having been given to alternative, more suitable, sites. Alternative sites could include the Lyne Lane Sewage Treatment Works, Chertsey (approx. 2 miles east of Trumps Farm) which does not comprise Ancient Woodland, is not located in a part of the Green Belt which performs a highly valuable function and is better related to the SRN.

Q77. 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?
1.24 With specific regards to Land adjacent to Trumps Farm, we consider the allocation to relate specifically to a commitment from the Waste Disposal Authority in their Joint Municipal Waste Management Strategy (JMWMS) to develop infrastructure within Surrey to deliver additional capacity for Dry Mixed Recyclables. Further, the submission SWLP refers to a report presented to the Surrey Waste Board (an internal management board) which identifies a ‘potential benefit of having two MRFs in terms of operational flexibility’. DPDS therefore do not consider the need for an additional facility at Land adjacent to Trumps Farm to have been robustly justified, particularly when the Waste Needs Assessment (2019) identifies that even the existing Randall Lane MRF facility at Leatherhead is not operating at its full capacity.

1.25 In terms of deliverability of the Trumps Farm allocation, there remains two fundamental constraints to the site coming forward. Firstly, the site is located in a part of the Green Belt which isn’t proposed for removal by the LPA (Runnymede BC) in their Emerging Local Plan (currently undergoing examination); very special circumstances must therefore be demonstrated to justify any development of the site in line with the NPPF. Secondly the SWLP itself identifies, albeit inconspicuously within supporting text and footnotes, that the deliverability of the MRF facility at the identified capacity of 120,000 tpa (para 5.3.4.10) is wholly dependent on adequate highways mitigation with regards to the SRN. As discussed previously in this statement, there is no certainty that an adequate mitigation package will be agreed, let alone delivered, by the relevant stakeholders in a timely manner. Overall, therefore, there is no certainty that the Land adjacent to Trumps Farm can be delivered based on the significant constraints and the lack of clarity regarding the ability to overcome them.

**Q113. 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?**

1.26 As stated in the Supporting Text of Policy 11b: ‘The export of DMR management outside of Surrey is not consistent with the JMWMS (Joint Municipal Waste Management Strategy) that expects household waste arising in Surrey to be managed within the county.’ Currently (as noted in table 19 of the Submission SWLP), 32,368 tpa are managed within Surrey at the only DMR facility in Randall Road, Leatherhead out of 117,072 tpa produced within Surrey, meaning there are 84,704 tpa which are dealt with outside of Surrey.

1.27 It is proposed that the introduction of the site at Land adjacent to Trumps Farm will resolve this deficit, allowing Surrey to handle all of its DMR waste within the county if it reaches the expected capacity of up to 120,000 tpa. However, if highways improvements are not delivered the site will only be able to deal with 50,000 tpa, thus leaving an approximate deficit of 34,704 tpa. It should be noted that uncertainty around highways improvements would also bring into question the deliverability of proposed housing allocations in the vicinity of Land adjacent to Trumps Farm.

1.28 It is noted that the Waste Needs Assessment (2019) at page 52 highlights that the Randall Lane, Leatherhead facility in 2017 had a throughput of 34,161 tpa – this is significantly below its capacity of 53,693 tpa. It is not clear from the evidence base whether the existing MRF could be increased in capacity to handle additional waste. Rather, it is concluded that there are ‘potential benefits’ of instating an additional MRF in the County.
DPDS do not believe a robust enough assessment has been undertaken to consider all potential options for meeting the DMR needs for Surrey. Due to the central location of the Randall Lane, Leatherhead facility in the county, it could indeed be an option for the County Council to fully explore whether this facility/site could be expanded to increase its capacity to meet the County’s needs. Such alternatives may not be subject to the same uncertainty as the Land adjacent to Trumps Farm allocation, which is wholly dependent on both Green Belt release and highways improvements in order to be delivered at the required capacity, and should therefore be considered an unsound allocation.

Q114. 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?

The technical evidence base does not make clear why the Land adjacent to Trumps Farm has been allocated for a MRF, nor is it clear if any alternative sites have been considered for a specific MRF use. The site was not recommended for allocation within the Site Identification and Evaluation Report (2019) and there is no assessment of the site within the evidence base which makes a justified case for the site’s inclusion in the SWLP. Despite this, it has been allocated for what we consider to be “inappropriate development” within the Green Belt. We consider that a proposal on the site will not be capable of demonstrating “very special circumstances” as required by the NPPF and Policy 9 of the Submission SWLP and is therefore unsound as an allocation.

Furthermore, there is no justified reasoning as to why the allocated site has been preferred to a number of alternative sites which were considered for allocation such as the Lyne Lane Sewage Treatment Works, Chertsey. As noted in our response to other matters and previous representations, the Land adjacent to Trumps Farm is located within the Green Belt and is considered to be performing a valuable Green Belt function according to the most recent Green Belt Review undertaken by RBC. Consequently, the site is not being proposed for removal from the Green Belt in the submission Runnymede Local Plan 2030 which is currently undergoing examination.

Although the potential alternative site at Lyne Lane is located within the Green Belt, the most recent RBC Green Belt Review suggests it is performing less of a function than the Land at Trumps Farm. The site is also not subject to as many constraints, with no ancient woodland designation and the impact on the surrounding road network likely to be less severe than the allocation at Trumps Farm.

In summary, the allocation at Trumps Farm is in direct conflict with the SWLP’s own locational hierarchy/spatial strategy. This is by virtue of the allocation being in an area of the Green Belt performing a highly valuable function, an area comprising an irreplaceable habitat (i.e. ancient woodland) and an area vulnerable to experiencing a severe cumulative highways impact. From the site assessment there is no clear evidence and reasoning which suggests that the Land at Trumps Farm is most suitable when compared to all reasonable alternatives which were considered in the Site Identification and Evaluation Report (2019). The allocation is unjustified and therefore not sound.
Q115. 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)?

1.34 The Land adjacent to Trumps Farm is the furthest away from the Strategic Road Network (SRN) of the allocated sites, located 6.9km from the nearest connection. Further to this, highways impact in the vicinity remains a significant issue in the context of the Runnymede Local Plan 2030 Examination, given the vehicle movements which would be generated by proposed strategic allocations in the area.

1.35 DPDS remain unconvinced that the proximity principle is a justified, clear and robust reasoning for the allocation at Trumps Farm. As is explained in our response to Matter 4 and in our previous representations, DPDS do not believe the reasoning outlined in the supporting text for Policy 11b is justified. Paragraph 5.3.4.8 states: “The existing Leatherhead MRF is well located to serve the WCAs towards the south east of the county, and so, in accordance with the proximity principle, the second MRF should be located towards the north west of the county.” DPDS do not consider that the existing MRF at Leatherhead is located towards the south east of the county but is rather located centrally within the county and a mere 17 miles away from the proposed MRF at Trumps Farm, Longcross. DPDS therefore do not believe this justifies the use of the proximity principle as a reason for allocating Trumps Farm in the SWLP.

1.36 Further to this, if the proximity principle is one of the main reasons for allocating an MRF at this site, there is no justification as to why the site at Trumps Farm would be preferred to reasonable alternatives such as the site at Lyne Lane, Chertsey. This site is located just 2.3 miles to the East of Trumps Farm, and is located approximately 15 miles from the MRF at Leatherhead. The site at Lyne Lane is arguably just as well suited to serve the north east of the county as the site at Trumps Farm is considered to do.

1.37 The Lyne Lane site was considered in Section 6 of the SCC Transport Study. Paragraph 6.1.2 explains that access to the site is good with suitable visibility and geometry for HGV movements. Lyne Lane is a relatively wide rural road that could potentially accommodate an increase in traffic movements.

1.38 Paragraphs 6.1.3 and 6.2.4 – 6.2.7 explain that there has been a history of accidents, none involving HGVs, but various measures have been introduced, or are proposed, to improve safety at junctions on the route to the SRN. Measures already introduced appear to have mitigated the issue.

1.39 The Transport Study stresses that nearby developments including Longcross, and also the proposed site at Land adjacent to Trumps Farm, must be taken into account when considering the Lyne Lane site. It concludes that medium sized waste facility types with capacities up to 120,000tpa could be considered at Lyne Lane.

1.40 In contrast, the Transport Study (Section 7) suggests that small sized facility types with capacities under 50,000tpa could be accommodated at Trumps Farm; the evidence shows that this site is not yet suitable for large or medium facilities but may [our underlining] be able to accommodate a medium sized intensification of activities if suitable mitigation is implemented.
In other words, SCC’s own Transport Study concludes that Lyne Lane would be more suitable for a 120,000tpa MRF than Land adjacent to Trumps Farm which is wholly dependent on appropriate highways mitigation to operate at such capacity. It is therefore not clear in transport terms why Land adjacent to Trumps Farm was taken forward to the Submission SWLP in preference to Lyne Lane.

The site at Lyne Lane is not located in close proximity to strategic local plan housing allocations, it does not have the natural constraint of ancient woodland located on site and it is located closer to the SRN than the Trumps Farm allocation.

It could be argued that there is still a lot of uncertainty as to whether the site at Land adjacent to Trumps Farm will be able to become a large scale facility, due to ongoing discussions regarding highways mitigation. Given this, it is considered that the site at Lyne Lane is a more suitable site for allocation, it was also considered for a Recycling facility in the previous plan and there is nothing to suggest this allocation cannot continue.

In addition, Appendix B of the NPPW sets out locational criteria which should be considered in testing the suitability of sites and areas in the preparation of Local Plans. Criteria 1) of appendix states:

“1. potential land use conflict

Likely proposed development in the vicinity of the location under consideration should be taken into account in considering site suitability and the envisaged waste management facility.”

We consider that the proposed allocation at Land adjacent to Trumps Farm does not accord with criteria 1) of appendix B for the reasons identified above.

Further, Section C-7 of Appendix C to the Environmental & Sustainability Report assesses and appraises potential site allocations located in Runnymede Borough (including Trumps Farm). Under the Ecological Network assessment heading on page 402 it states the following for Type 4, Type 5, & Type 6 Waste Management Facilities:

“On a precautionary basis it is recommended that the site would not be an appropriate location for any waste management development that gives rise to additional HGV traffic.”

If the proposed allocation is developed it will give rise to additional HGV traffic. It is therefore concerning that the site continues to be proposed for allocation when the evidence base is suggesting that the proposed site is not an appropriate location.

The allocation (Policy 11b), and the supporting paragraph 5.3.4.10, fail to make clear that the site will only be able to accommodate 120,000 tpa of DMR waste subject to highways mitigation, meaning it does not reflect the evidence base and is therefore unjustified. The policy fails to acknowledge the ongoing talks RBC, SCC and Highways England in relation to highways mitigation on the A320 associated with the Runnymede 2030 Local Plan. These ongoing discussions are also crucial to the allocation of the Land adjacent to Trumps Farm and it should therefore be recognised that the Plan is “unsound”. If these ongoing discussions fail to reach a positive outcome it could have major implications for the deliverability/viability of the site, the whole plan and its compliance with the Joint Municipal Waste Management Strategy.
1.47 Paragraph 5.3.4.10 makes no reference to the site’s ability to reach capacity being subject to highways mitigation, however a short footnote in the document does state subject to mitigation but it is not stated of what kind. This is not consistent with Part 2 of the SWLP which does refer to highways mitigation as one of the key development issues.

1.48 For the reasons outlined above it is considered that the Submission SWLP is “unsound” as it is not “justified”, “effective” and “consistent with national policy”. The proposed allocation at Land adjacent to Trumps Farm should not be allocated and therefore Policy 11b and supporting text at paragraphs 5.3.4.8 to 5.3.4.9 should be deleted. The proposed allocation of Land adjacent to Trumps Farm should also be removed from the Submission SWLP Part 2 (Sites and areas of search). It is considered that the proposed allocation of the Land adjacent to Trumps Farm has not been informed by the evidence base and there are also more suitable alternative sites.

Q116. 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?

1.49 In the submission SWLP, only the supporting text (paragraph 5.3.4.11) for Policy 11b references compliance with other policies: “As with the other allocated sites, any planning application for development on the allocated site would be judged on its merits against Policy 11b and all other policies of the plan. Those considerations set out in the supporting text to Policy 11a (Strategic Waste Site Allocations), apply equally to development of the site allocated under Policy 11b.”

1.50 Similarly, only in the supporting text (paragraph 5.3.4.10) is it acknowledged that the Trumps Farm site is located within the Green Belt, however no reference is made to the policy constraints which this presents (i.e. ‘very special circumstances’ will need to be demonstrated to justify the site’s development, given that the site is not proposed for removal from the Green Belt by Runneymede BC). Rather, it is noted that the site is a ‘suitable’ and ‘deliverable’ location to develop a MRF to deal with 120,000 tpa.

1.51 Mindful of the nature of constraints on the Trumps Farm site (Green Belt, ancient woodland and cumulative highways impact), it appears as though the SWLP has failed to acknowledge their significance and the substantial policy hurdles they pose on the deliverability of the allocation. Whilst DPDS would welcome the introduction of a specific reference to compliance with other policies, particularly those concerning the Green Belt (Policy 9) and Development Management (Policy 14), we ultimately consider the allocation at Trumps Farm to be fundamentally flawed rendering it undeliverable and in conflict with national policy, other policies within the SWLP and its own evidence base. We therefore believe the allocation is unsound and should be removed.

Q117. 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?

1.52 As indicated in the evidence base, the site is allocated in the Waste Local Plan 2008, yet the site did not come forward within this plan period. During the plan period an application was
submitted on the allocated site for an Energy from Waste (EfW) facility which was received by Surrey Council on 1st July 2008 (SCC Ref. 2008/0093). The application was withdrawn on 22nd December 2009 but it is not clear what the reasons for this were and whether they are resolvable. Indeed, no subsequent application has been submitted since therefore it is quite clear that operators do not feel confident of being able to overcome the constraints on the site to achieve permission for a waste facility. Given the significance of the enduring constraints on the site (Green Belt, ancient woodland and highways impact) it is considered that the Trumps Farm allocation will remain undeliverable within the next plan period.

1.53 Runnymede BC are continuing to retain the site within the Green Belt so any application will have to demonstrate Very Special Circumstances to remove the site from this designation. Further to this, the deliverability of the site at its allocated capacity of 120,000 tpa is wholly dependent on appropriate highways mitigation, the delivery of which is still uncertain and subject to stakeholder agreement.

1.54 Therefore, DPDS do not believe that the SWLP has appropriate justification for the allocation of the land adjacent to Trumps Farm. The Site Identification and Evaluation Report (April 2019) makes no reference to the suitability of Trumps Farm as an allocation and we consider it to have been carried forward only on the basis that it has been previously allocated. We therefore do not believe the allocation is “justified” and believe it will not be “effective” given that it was unable to be delivered in the previous plan period and significant insurmountable site constraints still remain.

Q118. 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?

1.55 The allocation at the Land adjacent to Trumps Farm contains two small areas of Ancient Woodland. Ancient Woodland is listed as an ‘Irreplaceable Habitat’ in the NPPF. Paragraph 175 of the NPPF states:

“Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.”

1.56 Given that ancient woodland is located on the site and that this is an ‘irreplaceable habitat’ the erection of a waste facility will lead to the deterioration of these assets. The site should not be allocated due to the likely impact on the ancient woodland. The concerns with regards to ancient woodland on the site were raised by the Surrey Nature Partnership in the Regulation 18 consultation. SCC’s response to these concerns, made in Appendix 7 of the Draft Consultation Summary Report (November 2018) was as follows:

1.57 “The avoidance of significant adverse effects on Ancient Woodland is dealt with through Policy 14 that sets out that planning permission for waste development will only be granted where it can be demonstrated that there will not be a significant adverse effect on the environment and this specifically includes Ancient Woodland.”
1.58 We consider that in proposing to allocate the Land adjacent at Trumps Farm the County Council has not demonstrated the Plan will accord with the NPPF. It has not been demonstrated that the proposal will not lead to the loss or deterioration of ancient woodland.

1.59 Policy 14 (Development Management) in relation to Biodiversity and the Natural Environment states planning permission would be granted where it can be demonstrated that:

“B. It would not result in significant adverse impacts on communities and the environment, which includes the following:

vii) Impacts on the historic landscape, on sites or structures of architectural and historic interest and their settings, and on sites of existing or potential archaeological interest or their settings.”

1.60 We would like to highlight that the wording at the start of part B) of the policy states “significant adverse impacts” whereas the criterion vii) refers to “impacts”. It is clear therefore that there are internal consistency issues in the Submission SWLP. However, more importantly the policy is not in accordance with paragraph 175 c) of the NPPF which refers to “loss or deterioration of irreplaceable habitats.”

1.61 We consider that the proposed site at Land adjacent to Trumps Farm will not be capable of accordance with this criterion of policy 14 or the NPPF. The site should therefore not be allocated in the SWLP.

Q119. 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?

1.62 Section 7 of the Transport Study discusses site RU02C: Land adjacent to Trumps Farm, Kitsmead Lane, Longcross. It is considered that the Transport Study contains a number of inconsistencies in respect of Land adjacent to Trumps Farm.

1.63 Paragraph 7.1.2 states:

“Access to the site is good, with suitable visibilities to facilitate safe access and egress of HGVs. There is also currently good access to the SRN, and specifically the M25, via the B386 Longcross Road and A320 Guildford Road/St Peter’s Way.”

1.64 However, although there is satisfactory visibility to the north within the 40mph speed limit, visibility is restricted to the south, where a 60mph speed limit applies, by the vertical alignment of Kitsmead Road. This is acknowledged in paragraph 7.4.1 which suggests that to improve safety / access arrangements, a reduction in the speed limit on Kitsmead Road may be required.

1.65 Paragraph 7.1.3 states:

“Furthermore, there is an ongoing problem with vehicles overshooting the junction when approaching Longcross Road on Kitsmead Lane. Various measures have been introduced to try and address the problem (enhanced signing, road markings, hazard marker posts etc). However, personal injury collisions continue to occur at the junction.”
Paragraph 7.2.2 says:

“The most noticeable area of delay, which affects the SRN, is found on the B386 Holloway Hill, on the approach to the mini-roundabout with the A320 Guildford Road, with delay of 30-100 seconds recorded. The congestion continues along the A320 St Peter’s Way, on the approach to the M25. Westbound flow on the A320 St Peter’s Way is especially bad in the AM peak hour.”

This is illustrated in Appendix G from the Transport Study, reproduced in Figure 1 overleaf.

Thus, on SCC’s own analysis within the Transport Study, access to the site and access to the SRN are not good, either in terms of road safety or road capacity.

Congestion on the A320 at the approach to Junction 11 of the M25 was a significant issue at the Runnymede 2030 Local Plan Examination Parts 1 and 2 in relation to the growth proposed to be delivered through the Local Plan, including Longcross Garden Village. No evidence was then available that schemes to mitigate the impact on the A320, and which would satisfy Highways England, could be identified and delivered in a timely manner and at a reasonable cost. Existing congestion on the A320 therefore throws doubt on both the Runnymede 2030 Local Plan and the SWLP, and should not be set aside so lightly.

Q120. 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?

We have serious concerns regarding the cumulative impact of the potential Land adjacent to Trumps Farm allocation in combination with proposed housing allocations at Longcross Garden Village (and Virginia Water South).

Longcross Garden Village, which is allocated in the emerging Runnymede 2030 Local Plan, is located to the west of Kitsmead Lane and north of Longcross Road, west of Trump Farm. The proposed Longcross Garden Village includes 1,700 homes, of which 200 homes at Longcross North have received planning consent, plus Business Park and associated amenities. Although the proposals include the existing Longcross railway station, a development of this scale can be expected to generate significant volumes of traffic on local roads including Kitsmead Lane and Longcross Road, as well as on the SRN further afield.

There is no evidence in the SWLP that the cumulative effect with Longcross Garden Village has been taken into account in allocating Land adjacent to Trumps Farm for a MRF with a capacity of 120,000tpa, generating 80 – 137 HGVs per day.

For example, allocated sites are discussed in the Submission SWLP Part 2. Land adjacent to Trumps Farm, Kitsmead Lane, Longcross is considered on pages 66 – 67. The key development issues mention houses within 150 metres of the site on the opposite side of the M3 and also on Kitsmead Lane, but make no mention of the proposed Longcross Garden Village.
1.74 The NPPW highlights the importance of considering cumulative impacts in waste planning. Paragraph 1 states:

“Positive planning plays a pivotal role in delivering this country’s waste ambitions through:

- Ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable development communities.”

1.75 Paragraph 5 of the National Planning Policy for Waste adds:

“Waste Planning Authorities should assess the suitability of sites and/or areas for new or enhances waste management facilities against each of the following criteria:

- The cumulative impacts of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on the environmental quality, social cohesion and inclusion or economic potential.”

1.76 Appendix B includes the Locational Criteria to be considered when testing the suitability of sites also makes reference (at point I) to potential land use conflict as follows:

1.77 “Likely proposed development in the vicinity of the location under consideration should be taken into account in considering site suitability and the envisaged waste management facility.”

1.78 In relation to cumulative impacts paragraph 5.4.2.49 of the Submission SWLP states:

“Where the development of new waste management facilities, or redevelopment of an existing facility, is proposed, the planning application should take account of the relationship of that site to other new development (including non-waste development) that has been proposed or permitted within the local area. Where assessments have been undertaken in respect of those proposals, the information submitted in support of the proposed waste development should include consideration of the potential for in-combination effects. Where short-term significant adverse impacts are identified e.g. during construction of a new facility it is important that any significant adverse impacts in the short-term, e.g. the impacts of HGVs on residential or visual amenity, are outweighed by the long-term benefits.”

1.79 Criterion ix) of policy 14 states:

“ix) Cumulative impacts arising from the interactions between waste developments, and between waste development and other forms of development.”

1.80 Therefore it can be seen that cumulative impacts are very important consideration as outlined in the NPPW but also the policies and supporting text in the Submission SWLP.

1.81 Given the potential cumulative impacts of this development in conjunction with that proposed at Longcross Garden Village (and the allocation at Virginia Water South), the Land adjacent to Trumps Farm site should be seen as unsuitable. The likely severe impacts on the local road
network and SRN and significant social and environmental adverse impacts therefore demonstrates that the proposed allocation does not comply with the NPPW.

1.82 We consider that the cumulative impact likely to occur from these developments in conjunction with that proposed at Land adjacent to Trumps Farm has not been fully considered in the evolution of the SWLP, including its evidence base, and the allocation of Land adjacent to Trumps Farm in particular.

1.83 We consider that the proposed site at Land adjacent to Trumps Farm will not be capable of accordance with this criterion of policy 14 or the NPPW. The site should therefore not be allocated in the SWLP.

1.84 Paragraphs 7.3.8 and 7.3.9 of the Transport Study discuss the types of waste management that could take place at the Trumps Farm site. Paragraph 7.3.8 summarises the concerns outlined above:

1.85 “From the evidence gathered above, it is clear to see that although there is little congestion in the vicinity of the site, there are large amounts of delay on the preferred SRN route, which is also a relatively long distance from the site. In addition, there are some collisions near to the site, and while the road and current access arrangements are appropriate, a reduction in collisions is required. Furthermore, there are very large developments in the vicinity of the site, at Longcross and in Chertsey South, which could have an impact on the suitability of site.”

1.86 Paragraph 7.3.8 explains that there are very large developments in the vicinity of the site, including the proposed Longcross Garden Village, which could have an impact on the suitability of the site. Paragraph 7.3.9 goes on to suggest that small sized facility types with capacities under 50,000 tonnes per annum (tpa) could be considered, such as windrow composting, in-vessel composting and anaerobic digestion, as the impact of their additional vehicles on the network is likely to be minimal.

1.87 Section 7.4 does suggest a number of mitigation measures including a reduction in the speed limit on Kitsmead Lane and improvements to the junction of Longcross Road and Kitsmead Lane. This section also comments that further improvement proposals exist in association with Longcross Garden Village, but are subject to the adoption of the Runnymede 2030 Local Plan and the progression of the Longcross South site. Improvement proposals are therefore vague, with no certainty of implementation.

1.88 Paragraph 7.5.3 of the Transport Study states in relation to Trumps Farm:

“7.5.3 It should be noted that the preferred access corridor to the SRN is lengthy and involves using the already congested routes in the vicinity of the M25. The corridor also passes close to some large nearby developments which could have a further detrimental impact on the congestion and on the viability of certain facility types. The nearest developments are to the west of the site at Longcross (North and South) and there are other developments in and around Virginia Water and Chertsey. It is important that the TA accompanying any application should assess the impact of these developments and the intensification of use at the waste site on the capacity of the highway network, in accordance with Policy 15 of the SWLP.”
Paragraph 7.5.4 states that:

“In transport terms, the evidence shows that this site is not yet suitable for large or medium capability facilities, but may be able to accommodate a medium sized intensification of activities if suitable mitigation is implemented.” and “It is also imperative that this site is considered in association with the proposed site at Lyne Lane and the other large developments in the vicinity of the site”.

The implication is that the potential cumulative impact of transport movements on the SRN, from strategic waste sites or other development, has not yet been assessed, and is being left to the planning application stage.

The detailed assessment of the impact of Trumps Farm on the safety and capacity of the local and strategic highway network is therefore yet to take place, and the implications are currently unknown.

Section 7 of the Transport Study does identify a number of issues. These include safety issues on Kitsmead Lane, at the junctions with Chobham Lane to the north and Longcross Road to the south. Paragraph 7.2.7 acknowledges that with increased flows, collisions in the vicinity of this site may increase.

A number of existing or potential capacity issues are also identified. Paragraph 7.2.12 of the Transport Study states that as there is considerable change [in traffic flows] on Kitsmead Lane, it is important that the Transport Assessment accompanying any application should assess whether additional trips would have an unacceptable impact on the capacity of the highway network.

Paragraph 7.2.2 describes congestion affecting access to the strategic road network. This includes delay affecting the access to the SRN on the B386 Holloway Hill on the approach to the mini-roundabout with the A320 Guildford Road and congestion along the A320 St Peter’s Way on the approach to the M25. Paragraph 7.5.3 goes on to note that the preferred access corridor to the SRN is lengthy and passes close to some large developments which could have a further detrimental impact on the congestion and on the viability of certain facility types.

With the information presently available, it is impossible to say whether or not the development proposed would have a significant adverse impact on the safety and capacity of the local and strategic highway network.

A further point that should be taken into account is that recently agreed routeing arrangements for the existing anaerobic digestion facility operated by Severn Trent Green Power (West London) Ltd, located on Kitsmead Lane to the south of the proposed allocation, directs vehicles to turn right (north) out of the site, turn left at the northern end of Kitsmead Lane onto Chobham Lane, south west to the roundabout, then left to access the B386 Longcross Road. This route takes traffic around the perimeter of the proposed Longcross south site and, if adopted for HGV traffic associated with the proposed development at Trumps Farm, may have implications for the Longcross Garden Village development.
The mitigation measures suggested in Section 7.4 of the Transport Study which may enable a small or medium sized development are, in summary:

- Reduction in speed limit on Kitsmead Lane;
- Improvement at the Hardwick Lane / Holloway Hull junction as identified in the A320 study, subject to both the adoption of the Runnymede Local Plan and the progression of the Longcross South site;
- Improvements at the junction of the B386 Longcross Road and Kitsmead Lane.

Notwithstanding the above, the Transport Study recommendation relating to a small facility set out in Section 7 is ignored in the summary in Section 12. Paragraph 12.1.4 states:

“From the evidence shown in this report, the majority of the sites are capable of medium sized facility types with capacities up to 120,000 tpa. These sites are at Slyfield, Lyne Lane, Trumps Farm, Lambs Business Park and Martyrs Lane. They have average collision rates, reasonable distances to the SRN, some congestion in the vicinity of the site, and some impact on existing vehicle movements.”

This recommendation, rather than the recommendation in Section 7 of the Transport Study, was taken forward to Policy 11b of the Submission SWLP. This policy allocates the site at Land adjacent to Trumps Farm for a household waste MRF.

The SWLP has therefore ignored the evidence base set out in the Transport Study in respect of Land adjacent to Trumps Farm.

Table 7.1 of the Transport Study suggests that a MRF at Land adjacent to Trumps Farm would result in 97 – 166 additional vehicles per day in total, including 80 – 137 HGVs, equivalent to an increase of 130% - 223% in HGVs on Kitsmead Lane, and a 49% - 84% increase in HGVs on Longcross Road.

Given the safety record and congestion issues discussed in the Transport Study, the proposal for a MRF at Land adjacent to Trumps Farm is considered incompatible with the proposed Longcross Garden Village proposed to be allocated in the Runnymede 2030 Local Plan in transport terms.

Policy 11b allocates Land adjacent to Trumps Farm, Longcross for a MRF to deal with approximately 120,000 tonnes per annum of DMR. The policy does not specifically mention the need for highways improvements to support this level of development.

As discussed above, the Transport Study recommended that Land adjacent to Trumps Farm would be suitable for a small sized facility with a capacity of under 50,000 tpa. In proposing a MRF with a capacity of 120,000 tpa at Land adjacent to Trumps Farm, SCC is ignoring its own evidence base in transport terms.

Q121. 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?
Policy 14 of the SWLP states that planning applications for waste development will be granted where it can be demonstrated that it would not result in significant adverse impacts on a number of key planning constraints within the county. The land adjacent to Trumps Farm is severely constrained and DPDS are not convinced that the site will be able to meet the policy requirements of Policy 14. Further to this, there has been no explanation as to how any of these constraints could be overcome but merely an acknowledgement of their existence.

Environmental Impacts

The Strategic Environmental Assessment and Sustainability Report (December 2018) states that for the ‘safeguarding of ecological assets and designated sites, the development of the site was assessed as being of ‘high’ significance’ and adverse across all development types.’ This does not suggest that any proposed development will be able to comply with the requirements for Policy 14.

Whilst the location of Ancient Woodland on the allocated site is acknowledged there is no indication as to how this constraint could be overcome. There is also no indication of the impact any development on the site could have on this ancient woodland, DPDS presume a developer would not be proposing to remove it but this is a major unknown. Furthermore, any development of the scale proposed would almost certainly have a detrimental impact upon the setting of the ancient woodland and the amenity of the environmental asset.

Furthermore, one of the main considerations that DPDS feel the SWLP has failed to acknowledge is the location of an Operational SANG site to the South of the proposed site. This site has been allocated in the Submission Runnymede 2030 Local Plan for use by residents of Longcross North and the remainder of the proposed Longcross Garden Village and other surrounding settlements. The SANG allocation boundary is adjacent to the current waste services which occupy the land at Trumps Farm (Anaerobic Digestion and Compost Services). It is considered that the addition of a MRF will result in a cumulative impact on this area which will have significant adverse impacts on the amenity of this SANG site, therefore making this allocation an unsuitable site.

We consider that the proposed site at Land adjacent to Trumps Farm will not be capable of accordance with the criterion of policy 14 in relation to environmental constraints as well as the amenity of the operational SANG site.

Amenity

Policy 14 considers the following issues relevant to amenity:

- Impacts caused by noise, dust, fumes, odour, vibration, illumination.
- Impacts on public open space, the rights of way network, and outdoor recreation facilities.

The proposed allocation is located in close proximity to the proposed housing allocation at Longcross Garden Village (and Virginia Water South). The allocation of a waste facility in such close proximity to major residential development sites within Runnymede Borough is likely to impact the amenity of the new residents at these locations.
1.110 Within the Submission SWLP Part 2 on page 67 it confirms that general amenity was raised as a key development issue for the Land adjacent to Trumps Farm as follows:

“There are houses within 150 metres of the site on the opposite side of the M3 and also on Kitsmead Lane.”

1.111 It is concerning that no reference is made to the proposed allocations in the Runnymede Local Plan which if these sites are developed could become a very significant issue for the proposed waste allocation and vice versa.

1.112 For clarity, DPDS would like to make clear on behalf of our client that there are fundamental concerns with the draft Runnymede 2030 Local Plan and in particular the proposed allocation at Longcross Garden Village. We have made clear through our involvement in the emerging Runnymede 2030 Local Plan, including at the examination, that the Plan is unsound.

1.113 The proposed route of HGVs (as indicated in Part 1 of the SWLP Transport Assessment) from the site will also pass by a number of existing residential areas, negatively affecting the amenity of these dwellings. This does not take into account development proposed in the draft Runnymede 2030 Local Plan which could also be affected by the proposed increased number of HGVs if Land adjacent to Trumps Farm was developed.

1.114 The Surrey WLP Environmental & Sustainability Report Appendix C7.B.3 analyses the various impacts at the allocation of Land adjacent to Trumps Farm. This report suggests for emissions to air from the transport of waste materials, the anticipated adverse impacts from the type of waste development proposed is of ‘medium-significance.’ Taking into consideration the proposed developments at Longcross Garden Village and Virginia Water South, the cumulative impacts on air quality, as a result of increased cars on the road, in general is likely to have a much greater impact than medium-significance when all developments are completed and in operation.

1.115 We consider that the proposed site at Land adjacent to Trumps Farm will not be capable of accordance with this criterion of policy 14. The site should therefore not be allocated in the SWLP.

Air Quality

1.116 We also have concern over the proposed site at Land adjacent to Trumps farm due to air quality matters. This is pertinent as the nearest AQMA is the ‘M25’ AQMA 2.5km east of the site, which has been designated because nitrogen dioxide and particulate matter.

1.117 The assessment of Land adjacent to Trumps Farm in the SWLP Air Quality Assessment Part 1 (April 2018) fails to mention the proposed housing allocation of Longcross Garden Village (and also residential development proposed at Virginia Water South). The cumulative impact on the SRN as a result of these proposed housing allocations along with the proposed allocation at Trumps Farm could have significant adverse impacts on air quality within the local area due to the increased vehicle movements on the SRN.
We consider that the proposed site at Land adjacent to Trumps Farm will not be capable of accordance with this criterion of policy 14. The site should therefore not be allocated in the SWLP.

For the reasons outlined above it is considered that the Submission SWLP is “unsound” as it is not “justified”, “effective” and “consistent with national policy”. The proposed allocation at Land adjacent to Trumps Farm should not be allocated. The proposed allocation of Land adjacent to Trumps Farm should also be removed from the Submission SWLP Part 2 (Sites and areas of search).

Q122. 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?

As we have outlined throughout our response to this matter and in our response to other matters and other consultations, DPDS are not of the opinion that the Land adjacent to Trumps Farm is capable of being delivered. We do not believe there is a reasonable prospect of resolving the constraints applicable to the Land adjacent to Trumps Farm given their severity. The incapability of delivering this site is further backed up by the fact that the site was allocated in the currently adopted Surrey Waste Plan 2008 and was not delivered, there is no evidence which suggests the site will be delivered in this plan period.

The site’s location in Green Belt land which is performing a ‘highly valuable Green Belt Function’ according to the Runnymede Green Belt Review (2014). The site is also subject to other constraints including cumulative impacts on the SRN, impacts on ancient woodland, and potential areas of archaeological importance. Should an application which comes forward be able to demonstrate the ‘very special circumstances’ it would still need to comply with all relevant requirements in Policy 14 to gain approval. In our professional view, DPDS believe this site is not capable of delivery due to the vast number of constraints and in particular the site’s location within the Green Belt.

Further, the key development issues listed in Section 5.2 of Part 2 of the SWLP do not properly identify constraints in relation to transport, only stating:

| Indicative scale | Small size (up to 50,000 tpa) but potentially medium size (up to 120,000 tpa) with improvements to the highway network. |
| Transport        | Access to the site is gained from the west, off Kitsmead Lane, which links to the A320 to the south east, via the B386. The site is likely to be able to accommodate small scale facility types (with capacities of up to 50,000 tpa) without wider improvements to the highway network. |

Suggested mitigation measures set out in the Transport Study are summarised in the response to Question 120 and include improvements to Kitsmead Lane and its junction with Longcross Road, and improvement at the Hardwick Lane / Holloway Hull junction as identified in the A320 study, the latter subject to both the adoption of the Runnymede Local Plan and the progression of the Longcross South site.

Whilst improvements to Kitsmead Road / Longcross Road may be achievable, subject for example to a Traffic Regulation Order, land availability, a Section 278 agreement and funding,
improvements in the vicinity of the A320 are likely to be beyond the scope of the operator of the proposed household waste materials recycling facility at Trumps Farm.

1.125 The examination of the Runnymede Local Plan commenced in November 2018. The programme for the examination has been amended on a number of occasions, and the Stage 3 hearing concerning the implications of the plan for the Strategic Road Network and the A320 is currently expected to be held on 14 November 2019, once the Council has published further information on these issues. There is therefore no timetable for the implementation of works to the A320 at present.