MATTER 7: TRANSPORT AND CONNECTIVITY

1. Our response to Matter 7 is submitted on behalf of our client, WT Lamb Holdings Ltd.1

2. WT Lamb is generally supportive of the emerging Surrey Waste Local Plan (SWLP). However, in respect of Matter 7: Transport and Connectivity, our representations can be summarised as follows:

- The cumulative impacts from the allocated sites on the highways network, including the Strategic Road Network have been assessed by the County Council, both in the context of the SWLP and on behalf of Tandridge District Council for their emerging Local Plan, and by Miles White Transport, on behalf of WT Lamb;
- Each of the transportation assessments identifies that with mitigation, a new waste management facility at Lambs Business Park could be delivered without severe adverse impacts to the highways network; and
- There has not been an assessment of the ILAS in transport terms, either individually or cumulatively.

Question 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?

3. During the preparation of the SWLP, the County Council undertook a high-level assessment of the transportation impacts of nine shortlisted sites that the WPA considered to be potentially suitable for accommodating new waste management facilities. The work was also used to inform the scale and type of facility at each site. All the proposed Policy 11 allocations were assessed within the transport work.

4. The assessment adopted the following approach:

- Stage 1 – the existing traffic flows on all roads in the vicinity of each site was obtained. This included, where relevant, roads classified as being of strategic importance. This helped to establish an understanding of the current traffic flow conditions surrounding each shortlisted site;
- Stage 2 – the likely flows associated with each potential type and scale of waste management facility was added to the baseline position, which as identified above, could include strategic roads;
- Stage 3 – the likely preferred vehicle routing from each site to the strategic road network

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1 WT Lamb Holdings own Lambs Business Park on a freehold basis. The western portion of the site is identified as an allocation in the Submission Surrey Waste Local Plan 2019-2033 (Policy 11a refers). Lambs Business Park is also a proposed allocation in the Submission Tandridge District Local Plan (hereafter TDC LP), wherein there is also recognition that the exceptional circumstances exist to remove the site from the Metropolitan Green Belt. Policy SES003 of the TDC LP relates primarily to B-class employment uses, but there is also acknowledgement that, in line with the emerging Surrey Waste Local Plan that the western extent of the site is suitable for waste management purposes. The Examination of the Tandridge Local Plan commences in October 2019.
2 Waste Local Plan Transport Study (2018)
3 Section 1.2 of the Waste Local Plan Transport Study (2018)
4 Para. 1.3.10 of the Waste Local Plan Transport Study (2018)
was identified. Primarily, this was determined as being the shortest route to junctions with access to the strategic road network\(^5\);

- Stage 4 – the cumulative impact of each type and scale of waste management facility, with other developments in the surrounding environs was considered; and

- Stage 5 – Any necessary mitigation was identified.

5. Accordingly, the methodology has ensured that the existing and future performance of the strategic road network has been assessed, in combination with other planned developments in the surrounding area.

6. In terms of Lambs Business Park\(^6\), the A22, which forms part of the Strategic Road Network, is identified as being a road within close proximity of the site. The current conditions on the A22 within the assessment area are described therein\(^7\). Existing flow data is also provided, to which flows from all the proposed new waste management facilities have been added. The Report concludes that the vehicle flows from all the types of facility assessed would be very low, with the majority of increases being less than 1%, which was considered by the County Council to be an acceptable increase\(^8\).

7. The impact of new waste management facilities at Lambs Business Park has been considered in combination with development in the surrounding area, including the South Godstone Garden Community\(^9\).

8. With mitigation in the form of an improvement to the A22 Eastbourne Road and Tilburstow Hill Road Junction\(^10\), the County Council's assessment concludes that given the limited congestion, low collision rate and the low impact of additional traffic from the site as a result of new waste management facilities on the existing highways network, including the strategic highways network, the site is suitable for larger types of facility. It is however noted that the length of the preferred route to the A22 and the emerging south Godstone Garden Village could have an impact on the scale of facility proposed\(^11\).

9. There is also recognition that the utilisation of the existing railway siding and wider railway network could support sustainable transport patterns\(^12\).

10. As part of their own evidence base, Tandridge District Council have also undertaken various assessments of the implications on the highways network, including the strategic highways network\(^13\). As an allocation within the emerging Local Plan, proposals at Lambs Business Park were also considered through this process. Its continued allocation within the emerging Local Plan demonstrates that, with mitigation in the form of an improvement to the A22/Tilburstow Hill Junction, the site would not have a severe highways impact, including to the Strategic Highways Network.

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\(^5\) Para. 1.3.17 and 1.3.18 of the Waste Local Plan Transport Study (2018)

\(^6\) Considered in Section 9 of the Waste Local Plan Transport Study (2018)

\(^7\) Para. 9.2.1 and 9.2.2 of the Waste Local Plan Transport Study (2018)

\(^8\) Para. 9.2.8 of the Waste Local Plan Transport Study (2018)

\(^9\) Para. 9.3.3 and 9.3.4 of the Waste Local Plan Transport Study (2018)

\(^10\) Section 9.4 of the Waste Local Plan Transport Study (2018)

\(^11\) Paras. 9.3.5 and 9.3.6 of the Waste Local Plan Transport Study (2018)

\(^12\) Para. 9.4.2 of the Waste Local Plan Transport Study (2018)

\(^13\) Strategic Highways Assessment (2015), Strategic Highways Assessment Scenarios 2A-F (2018), and Strategic Highways Assessment – Mitigation (2018)
Network. The A22/Tilburstow Hill Road Junction improvement is identified within the Tandridge District Council’s Infrastructure Development Plan (2019).

11. In addition, a Transport Technical Note undertaken on behalf of WT Lamb for the redevelopment proposals at Lambs Business Park, has been provided at Appendix 4 of our Matter 5 participant statement. It also assesses the cumulative impact of a new waste management facility at Lambs Business Park, in combination with developments in the surrounding area, including the other proposals at the site and the South Godstone Garden Village. The work concludes that with mitigation at the A22/Tilburstow Hill Junction, there would not be a severe adverse impact on the highways network, including the A22, which forms part of the Strategic Road Network. This mitigation is discussed further in our response to Question 135.

12. In contrast to the detailed and robust evidence base prepared to support the Policy 11 allocations, the County Council’s Highways Transport Study (2018) does not assess, either individually or cumulatively, the impact of the ILAS. As such, the transport implications of accommodating new waste management facilities at the ILAS have not been assessed. In line with our participant statements to Matters 4 and 5, there can be no certainty that the ILAS are suitable and achievable for accommodating new waste management facilities. It would therefore be an ineffective strategy for the WPA to rely on the ILAS to meet needs.

**Question 135: How are any adverse impacts on the SRN and local road 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 Transport Management Plans and Transport Assessments to support development proposals? Similarly, should the supporting text clearly identify the extent, type and method of assessment required?**

13. As identified above, as part of the County Council’s Transport Study, an assessment is made for each site as to whether mitigation is required to prevent adverse impacts on the highways network. The delivery of the mitigation identified for each site will ensure that the adverse impacts on the network are minimised.

14. For Lambs Business Park, the County Council’s work concludes that an improvement to the A22/Tilburstow Hill Junction is required and that both a roundabout and a signalised junction should be tested. The modelling outputs of that work are to be used to determine which option is perused. \(^{14}\)

15. The Transport Technical Note undertaken on behalf of WT Lamb and provided at Appendix 4 of our Matter 5 participant statement, demonstrates that both improvements could be delivered within highways land and either option could operate satisfactorily, even in the event that the railway was not utilised for the importation of waste and the exportation of the recycled product, as is WT Lamb's aspiration (referred to in the Technical Note as being the ‘worst-case’ scenario).

16. Additionally, the transportation of waste on either the railway or water, as is encouraged by Policy 15(a)(i), will also reduce impacts on the highways network. As indicated within WT Lamb’s Transport Technical Note, it is WT Lamb’s aspiration to utilise its privately-owned railway siding for the importation of waste and to export recycled products. The work demonstrates that such a strategy is

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\(^{14}\) Para. 9.4.1 of the Waste Local Plan Transport Study (2018)
entirely achievable.

LRM Planning
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