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

Matter 7: Transport and Connectivity

On behalf of SMECH Management Company Ltd

Incorporating work from PFA Consulting

August 2019

C11786
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0.0 Introduction

0.1 This statement has been prepared by DPDS Consulting Group (DPDS) and PFA Consulting Ltd (PFA) on behalf of SMECH Management Company Ltd. It sets out the response to the questions included in Matter 7 of the Hearings Programme. This matter is in relation to Transport and Connectivity (Policy 15).

0.2 DPDS has acted on behalf of SMECH Management Company Ltd since February 2013. DPDS has engaged in the 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 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 previous representations made to the Surrey Waste Local Plan 2019-2033. Hearing Statements have also been submitted on behalf of SMECH Management Company Ltd for Matters 1-6 and 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 7

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

1.2 Q134. 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?

1.3 The Waste Local Plan – Transport Study dated July 2018 includes assessments of the nine shortlisted sites to assess suitability for allocation for waste related development in terms of transport impacts. These include RU02C: Land adjacent to Trumps Farm, Kitsmead Lane, Longcross, discussed in Section 7 and Appendix G of the Transport Study. This site is allocated for a Household Waste Materials Recycling Facility under Policy 11b of the SWLP (also referenced as Site 5.6), to deal with approximately 120,000 tonnes per annum. It is located adjacent to an existing Anaerobic Digestion facility operated by Severn Trent Green Power (West London) Ltd.

1.4 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."

1.5 Paragraph 7.5.4 of the Transport Study goes on to state:

"7.5.4 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."

1.6 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.

1.7 That being so, the impact of the policies and proposals within the SWLP on the SRN is unknown.

1.8 Nonetheless, paragraph 7.5.1 of the Transport Study comments that whilst there is little congestion in the immediate area, closer to Chertsey South and St Peter’s Hospital the congestion increases greatly, and that large amounts of delay are experienced in the AM peak hour. The plan in Appendix G of the Transport Study illustrates this congestion and delay on the strategic road network.

1.9 Paragraph 102 of the NPPF states that: ‘Transport issues should be considered from the earliest stages of plan-making and development proposals so that:’

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a) The potential impacts of development on transport networks can be discussed.

1.10 We are under the impression that traffic impacts have not been fully considered for this development as the future traffic movement in the vicinity of Trumps Farm are at present unknown. It is therefore believed the plan cannot be deemed as ‘sound’, as it does not comply with the above paragraph of the NPPF.

1.11 Further to this, Paragraph 109 of the NPPF states: ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’

1.12 Should the emerging Runnymede Local Plan 2030 come forward the residual cumulative impacts upon the surrounding roads could be severe, and suitable highways mitigation will be required. Should the Runnymede Plan not come forward the site would increase traffic capacity on the surrounding area.

Source: Appendix G, Waste Local Plan – Transport Study: Site Assessments, Surrey County Council, July 2018

1.13 The implication is that without considerable mitigation, the proposals for Trumps Farm in the SWLP will add to congestion and delay on the SRN.

1.14 It is therefore believed that the potential cumulative impacts on the transport network have not been considered fully as they are currently unknown. The allocation of the site therefore does not comply with Paragraph 102 of the NPPF and Paragraph 5 of the NPPW respectively. It is therefore believed that the SWLP and the allocation of the Land adjacent to Trumps Farm is ‘unsound’ on the grounds that it is not ‘justified’ or ‘consistent with national policy.’ The allocation at Trumps Farm should therefore be removed from the plan.
Q135. How are any adverse impacts on the SRN and local roads proposed to be minimised? How does Policy 15 ensure that this will be effectively managed and controlled? To be effective, should the policy refer to the potential need for Traffic Management Plans and Transport Assessments to support development proposals? Similarly, should the supporting text clearly identify the extent, type and method of assessment required?

Paragraph 7.5.4 of the Transport Study concludes that small sized facility types (with capacities under 50,000 tpa) could be accommodated at Trumps Farm. It goes on to say that in transport terms, the evidence shows that this site is not yet suitable for large or medium capacity facilities, but may be able to accommodate a medium sized intensification of activities if suitable mitigation is implemented.

Despite this, Policy 11b in the SWLP allocates Site 5.6 at Trumps Farm for a medium sized (up to 120,000 tpa) facility, without identifying any mitigation measures to minimise adverse impacts on the SRN and local roads. Policy 11b merely states:

“Proposals for development in this location will need to demonstrate how the key development issues for the site have been addressed.”

Policy 15 sets out a number of tests that, on the evidence provided within the Transport Study, the site at Trumps Farm may well (or does) fail to meet:

“A. Planning permission for waste development will be granted where it can be demonstrated that:

i) Where practicable and economically viable, the development makes use of rail or water for the transportation of materials to and from the site.

ii) Transport links are adequate to serve the development or can be improved to an appropriate standard.

B. Where the need for road transport has been demonstrated, the development will ensure that:

iii) Waste is able to be transported using the best roads available, which will usually be main roads and motorways, with minimal use of local roads, unless special circumstances apply.

iv) The distance and number of vehicle movements associated with the development are minimised.

v) Vehicle movements associated with the development will not have a significant adverse impact on the capacity of the highway network.

vi) There is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have a significant adverse impact on the safety of the highway network...”

Specific issues relating to Trumps Farm include no access other than by road, and the furthest distance of any of the allocated sites from the SRN.

Notwithstanding this, paragraph 12.1.6 of the Transport Study states that a full Transport Assessment will be required for any proposed development at any of the sites:
“12.1.6 As recommended throughout the report, a full Transport Assessment will be required for any proposed development at any of the sites, and a traffic impact assessment should be carried out on the nearby junctions. Recommendations of junctions that should be included in the transport assessment are shown in Appendix M. A full Construction Management Plan will also be required. This will ensure that all of the requirements of Policy 15 are adhered to.”

1.21 Although the need for a Transport Assessment and Construction Traffic Management Plan may be implicit in Policy 15, there would be benefit in stating this specifically, for the avoidance of doubt, and (in respect of the Transport Assessment) to accord with paragraph 111 of the NPPF.

1.22 Appendix M referenced in paragraph 12.1.6 of the Transport Study lists junctions recommended to be included in the Transport Assessment for each site. In respect of Trumps Farm (Site 5.6 / Policy 11b) these are:

- “Kitsmead Lane and Chobham Lane/Trumpsgreen Road,
- Kitsmead Lane and B386 Longcross Road,
- B386 Longcross Road and Lyne Lane, and
- Hardwick Lane and B386 Holloway Hill”

1.23 These recommended junction assessments are not identified in the SWLP itself, and should be included either in Policy 15 or in the Policy relating to each site, or the relevant supporting text.

1.24 The note to Appendix M of the Transport Study explains that the list is not definitive and other junctions may need to be assessed depending on development proposals. Areas of concern on the SRN are however not specifically identified, and should be included in the supporting text to Policy 15 to ensure that they form part of the Transport Assessments for each development site.

1.25 Overall, it is clear that at present the future transport infrastructure is unknown as is the future local transport movement. The allocation of Trumps Farm is therefore inconsistent with Paragraph 102 of the NPPF. Furthermore, it is not consistent with Paragraph 5 of the NPPW, which states: ‘waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against... the capacity of existing and potential transport infrastructure to support the sustainable movement of waste.’ Given that at present the future transport infrastructure is unknown and the existing transport infrastructure is not adequate to support new development, including Trumps Farm, the site’s allocation within the SWLP cannot be justified, and is also not consistent with the NPPW.

1.26 It is therefore believed that the allocation of Trumps Farm is ‘unsound’ as it is not ‘consistent with national policy’ and is not ‘justified’ and should therefore be removed from the plan as a result.

1.27 Q136. Is the wording of Policy 15 B(vi) consistent with paragraph 109 of the NPPF, where it seeks to avoid unacceptable impacts on highway safety, or severe residual cumulative impacts on the road network?

1.28 The wording of Policy 15 B(vi) is itself not consistent with the entirety of paragraph 109 of the NPPF. Paragraph 109 refers to both the impacts on highway safety, and to severe residual cumulative impacts on the road network in more general terms. Policy 15 B(vi) focuses on highway safety only. However, the more general impact on the capacity of the highway network may be sufficiently covered by the wording of Policy 15 B(v). Nevertheless, in its current form
Policy 15 should be found ‘unsound’ as it is not ‘consistent with national policy’ with the current lack of clarity.

1.29 Q137. Proposed allocations A(i), B(i), B(ii) and B(ii) (Part 2 sites 5.1, site 5.2, site 5.3 and site 5.4) have identified a need or a potential need for highway improvements to facilitate delivery of the development proposed. Is there a reasonable prospect that these improvements will be delivered, including in relation to viability, feasibility and potential impacts on the SRN? What is the anticipated timescale for this work?

1.30 The proposed allocation within Policy 11b (Part 2 Site 11.6) merely mentions that access to the site is gained from the west, off Kitsmead Lane, which links to the south east, via the B386. The discussion of Site 5.6 Land adjacent to Trumps Farm, Kitsmead Lane, Longcross does not mention the need for highways improvements. However, the discussion of the site in Section 7 of the Transport Study does identify some issues, this is also raised in Part 2 of the SWLP.

1.31 These include known problems on Kitsmead Lane including vehicle speeds and noise / vibration complaints from residents, and an ongoing problem with vehicles overshooting the junction when approaching Longcross Road on Kitsmead Lane.

1.32 In Section 7.4, the Transport Study suggests a number of mitigation measures:

- A reduction in the speed limit on Kitsmead Lane

- An improvement at the Hardwick Lane / Holloway Hill junction as identified in the A320 study (this junction is some 3.5km east of Kitsmead Lane; the B386 Holloway Hill is the continuation of the B386 Longcross Road)

- An improvement at the junction of the B386 Longcross Road and Kitsmead Lane

1.33 These potential improvements should be included in the text relating to Site 5.6, in the same way that potential improvements are identified for Sites 5.1, 5.2, 5.3 and 5.4.

1.34 The discussion in Section 7 of the Transport Study notes that the improvement at the Hardwick Lane / Holloway Hill junction is subject to both the adoption of the Runnymede Local Plan and the progression of the proposed Longcross South site (part of Longcross Garden Village). It also notes that there are likely to be considerable highway alterations in the area to accommodate Longcross Garden Village, but that there are no proposals as yet.

1.35 There is therefore no certainty about when, or whether, these improvements will be implemented.

1.36 The SWLP should therefore be seen as ‘unsound’ as the allocation of Trumps Farm is unlikely to be ‘effective’ and is not ‘consistent with national policy’, the allocation should therefore be removed from the SWLP on these grounds.