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

Matter 8: Community Engagement, Delivery,
Monitoring and Review

On behalf of SMECH Management Company Ltd

August 2019

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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 8 of the Hearings Programme. This matter is in relation to the Legal Requirements, the Duty-to Co-operate and the Plan Period.

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 1-5 and 7-8 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 8

Q143. What measures are in place to ensure that the SWLP can respond flexibly to changing circumstances that might arise through emerging plans being prepared elsewhere, particularly on issues with cross-boundary impacts? Are suitable arrangements in place for reviews of the SWLP at appropriate times? Are the potential triggers for such reviews clearly identified?

1.1 DPDS do not believe that appropriate measures are in place to ensure that the SWLP can respond flexibly to changing circumstances. It is not believed that the preparation of the SWLP has considered the emerging Runnymede Local Plan 2030 and the impact that this could have on the allocated site at Trumps Farm. The Runnymede Local Plan 2030 is currently undergoing examination, with Stage 3 of the Examination Hearings anticipated to take place in mid-November. As we have stated in our responses to other matters, the ability for the site at Trumps Farm to reach its maximum potential is subject to highways mitigation, which is very much dependent on the outcome of the Runnymede Local Plan Examination. The plan has not taken into consideration the different outcomes which could occur from the emerging Local Plan’s examination. Furthermore, any outcome from the Local Plan Examination is likely to have an impact on the operations of Trumps Farm, none of these outcomes appear to have been appropriately taken into consideration in the preparation of the SWLP.

1.2 Overall, it is not considered that the SWLP takes account of the emerging plans within Surrey and is not equipped to respond to any changing circumstances, particularly as the potential outcome of the Runnymede Local Plan Examination is still unknown.

1.3 Furthermore, DPDS do not believe suitable arrangements have been made for the review of the SWLP, this is not discussed at any points in the plan and there is no indication as to when SCC consider it appropriate to review the plan. In addition to this, no potential triggers are indicated for reviewing the plan. DPDS feel that given the lack of flexibility within the plan in its current form the failure to discuss reviewing the plan (and potential triggers) indicates that the plan is unlikely to be ‘effective’. It is therefore believed that the plan cannot be seen to be ‘sound’ in its current state.

Q144. Does the Plan provide flexibility? What contingency arrangements and alternative strategies have been considered if development identified in the Plan does not proceed, or the rate of development anticipated is not met, including in relation to the provision of infrastructure?

1.4 It is the belief of DPDS that the SWLP does not provide sufficient flexibility. The plan has allocates six sites for development, including the land adjacent to Trumps Farm. A number of these sites are located in the Green Belt, whilst some have been removed from the Green Belt in conjunction with their allocation in the SWLP. This therefore means that those sites located within the Green Belt must demonstrate Very Special Circumstances in order to justify their removal from the Green Belt. The case with most plans is that a site’s allocation in an adopted plan would 1) remove the site from the Green Belt; and 2) imply that the principle of development on the site is acceptable. Whereas, the allocation of the site in the SWLP does not remove the site from the Green Belt, this means that allocating the site only gets you a small part of the way to developing a site. Given the need for a number of sites to demonstrate Very Special Circumstances it is not believed that in its current form the site provides sufficient flexibility.
1.5 Whilst DPDS accept that it is important to have some level of flexibility within the plan, it is believed that the plan would be more likely to be deliverable and ‘effective’ if the site at Trumps Farm is removed. In its current state it is believed that development in the plan is unlikely to proceed, furthermore, it is unlikely that the anticipated rate of development will be met within the plan period. The main reasons for this belief is that the land adjacent to Trumps Farm was allocated in the previous plan period and did not come forward, despite a planning application being submitted on the site. Furthermore, the fact the site is located within the Green Belt means that the allocation does not allow for the principle of development on the site as there is still a need for the applicant to demonstrate the Very Special Circumstances required to remove it from the Green Belt. DPDS believe there are sites which could be considered more suitable than the Land adjacent to Trumps Farm, which would make the plan more deliverable. Therefore whilst flexibility would be welcomed the plan would be considered more deliverable than it is in its current state.

1.6 Therefore, whilst DPDS accept the importance of flexibility, the need for flexibility in the SWLP would be significantly less if the Land adjacent to Trumps Farm was removed. The site at Trumps Farm is significantly constrained, the operation and capacity of the site is also subject to residential allocations within the Runnymede Local Plan 2030 coming forward and suitable highways mitigation being implemented. It is believed the removal of the site would create a more ‘effective’ plan which is more likely to be deliverable within the plan period.

Q145. Is there a need to identify a reserve of potential future development sites, should the proposed allocated sites in the Plan not come forward for development as anticipated?

1.7 Whilst DPDS believe that there could be a need for a reserve of potential future development sites, we believe that reserve sites should be in appropriate locations and are not likely to be subject to similar constraints as the currently allocated sites. From our review of the Regulation 19 Representations made in March 2019, we noted from the representation made by NNS (Chertsey) LLP (UID 104), they were looking to promote the allocation of a site to the South of the allocated site at Land adjacent to Trumps Farm. NNS (Chertsey) LLP proposed their site as an alternative to the allocation of Land adjacent to Trumps Farm.

1.8 Whilst DPDS support the removal of the Land adjacent to Trumps Farm, we believe any alternative site allocated should not be in close proximity to the site due to the significant number of constraints that are still relevant to the site. The land to the south of the allocated site is still located within the Green Belt, is in closer proximity to the operational SANG and would still exacerbate the existing Highways issues. The site’s constraints are therefore very similar to that of the Trumps Farm allocation and it is therefore believed it will not be able to come forward within the plan period, and should therefore not be considered for allocation as either an allocated site or a reserve site.

1.9 We therefore conclude that whilst DPDS do believe that there could be a need for a reserve of potential future development sites we do not believe these should include the site which has been promoted by NNS (Chertsey) LLP as it is clearly not suitable for development. We do not believe this site or the allocated site at Land adjacent to Trumps Farm should be allocated in the plan due to the several constraints on the site which would prevent them from coming forward for waste development of any form.
Old Bank House
5 Devizes Road
Swindon
SN1 4BJ
t: 01793 610222
e: dpds.swindon@dpds.co.uk

3 Gleneagles House
Vernon Gate
Derby
DE1 1UP
t: 01332 206222
e: dpds.central@dpds.co.uk

www.dpds.co.uk