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7th February 2018

Dear Mr Sanderson,

**Surrey Waste Local Plan (SWLP) - Regulation 18 Draft Plan Consultation,
February 2018**

The Council would like to thank Surrey County Council (SCC) for the opportunity to provide additional comments on its emerging Waste Local Plan (WLP), following on from the Issues and Options consultation that took place between September - November 2016.

Having reviewed the documents produced by SCC, Elmbridge Borough Council (EBC) notes that SCC is looking to retain the allocation of the Former Weylands Treatment Works (Weylands) site in the new WLP. EBC continues to object to this proposal as initially expressed by its Members in 2016 following the agreement at full Council to seek the removal of the site from the WLP.

The 2016 decision was taken on the basis of a number of concerns which still remain. These are other issues which have subsequently arisen since this decision was taken are set out below.

Green Belt

In the Shortlisted Sites document (on page 7) it is noted by EBC that Weylands is described as being within an area of land that is 'performing a Green Belt function'. EBC would like this point to be clarified to highlight the fact that under EBC's independently produced Green Belt Boundary Review (2016) the area in which the Former Weylands Treatment Works (Weylands) site falls has been assessed to be

performing strongly against two and moderately against one of the three purposes of Green Belt utilised as part of that report. Its overall assessment in this Review is that it is a very strongly performing area of Green Belt. This strong performance against the purposes of Green Belt should be clearly recognised in this section of the document.

Potential future use / development of the Former Weylands Treatment Works site

Another issue that EBC has is with the Site Identification and Evaluation Report (specifically paragraph 4.2.5) where there is reference made to a previous application for an anaerobic digestion (AD) facility on the Weylands site. The summary of the reasons for the refusal of this application does not mention the fact that odour control was a major issue that the application failed to address, and the subsequent Surrey County Council officer report was flawed. The applicant withdrew their application before the Planning and Regulatory Committee meeting so EBC had no opportunity to challenge the failure to address odour. Attached to this response is a short note from Dr Peter Walsh at WSP/Parsons Brinckerhoff Response summarising our concerns on this matter.

Following the above point, EBC therefore objects to the proposed retention of the existing site from the current mix of uses (noted on p.6 of the Shortlisted Sites document as 'construction and demolition waste processing, skip and scaffolding hire, open and closed storage, car breakers and industrial units') and hosting an alternative form of waste processing, particularly if an AD facility were to be developed. This is on the grounds that controlling odours from the site would be highly problematic, particularly in light of the site's proximity to a large number of residential dwellings and businesses. In the opinion of EBC, if an AD facility were to be developed at this location, it would be putting a large number of residents and employees in the immediately adjacent area at risk of extremely adverse consequences (e.g. odours) and detrimentally affect the amenity of the area.

If SCC were minded to retain this site there must be a comprehensive and robust assessment of any future application informing a decision on amenity rather than an overreliance on permitting controls and mitigation as a way of protecting local amenity.

Impact on the proposed development at Drake Park

If the proposed Drake Park development is permitted by the Secretary of State, there could be significantly more residents and businesses, as well as a primary school located in close proximity to the Weylands site. Despite a proposed buffer zone of at least 50m and bunding, there is the potential that any new waste treatment development at Weylands could have a detrimental effect on the amenity of the proposed development. The current operation of the site does not pose the worst-case scenario.

A further point on buffers zones and appropriate distances between any theoretical AD facility and nearby residential and business development, EBC has previously (in

our response to the Issues and Options consultation) recommended that there should be one set out as part of any potential policy in the WLP. EBC commissioned an independent report into these concerns, which we attach as part of our response. Based on this report EBC would recommend that a buffer of at least 250m from the nearest residential properties is introduced. This would also be in line with the discussions had by Environment Agency planners in the Black Country.

Impact of the potential expansion of Heathrow airport

Since EBC's response to the Issues and Options Consultation on the WLP in November 2016, the Government has subsequently announced that it favours developing a third runway at Heathrow airport, though no conclusive decision on this has been made yet. Considering that (as mentioned in EBC's previous response) both Heathrow and Gatwick are just outside the County's borders, the Council considers that it would be prudent for SCC to take account of the potential impact of further airport development at either location. This is due to the ability of either site to have major impacts on the size of both construction and demolition as well as ongoing waste streams in the long term.

Highways issues

In addition to the above concerns about the type of facility that may be developed at Weylands, EBC has reservations about its impact on the immediate access to the site and the wider highways network. As noted by SCC on p.9 of the Shortlisted Sites document, access to the Weylands site is likely to need improvement and any proposal for the site will need to include a Transport Assessment / Statement dealing with safety and capacity issues on the local highway network. The existing access directly into / out of this site (which only has one narrow access point) and vehicular movements to / away along the nearby road network are all through or near to extensive residential areas. These issues (which generally apply to the continued use of the site regardless of the type of waste processing facility on site), would be compounded if the site were to be developed (as has previously been proposed) for an AD facility. This is because AD facilities would result in a 'relatively high number of HGV movements' (p.26 of the Types of Waste Management Facility document), particularly if a larger facility were to be sited at Weylands.

EBC remains unconvinced that the potentially high number of HGV movements that may be required by a large AD facility can be mitigated by 'limiting HGV movements' and 'routing deliveries away from sensitive areas' due to the immediate and wider access to the site being close to areas of employment and residential dwellings.

There are further concerns about the ability to mitigate other impacts of a potential AD facility in addition to those set out on p.27 of the Type of Waste Management Facility document. These particularly relate to the mitigation of noise from deliveries (due to the large number that may be required) as well as 'odour and air emissions' resulting from the enclosed nature of the operations. The latter long-term and on-going issues are already experienced at various other AD plants both in the UK and other countries in spite of the existence of extensive mitigation measures. One of

these mitigation measures is the complete enclosure of the facility, which has failed to remove the effect on the amenity of the area of odours and air emissions.

Conclusion

To summarise the above, as there is no indication as to the type of facility SCC deems to be acceptable or suitable for the various locations it is looking to allocate, this leaves a great amount of uncertainty. On this basis the Council cannot support the retention of the Weylands site as an allocation in the WLP and therefore advocate its removal from it.

I hope you find these comments useful in progressing work on the Surrey Waste Local Plan.

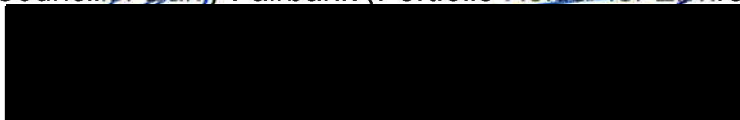
Please do not hesitate to contact officers if any of the points raised requires further explanation. If appropriate, officers would be happy to meet with you to discuss these comments in more detail.

Yours sincerely,

Councillor Karen Randolph (Portfolio Holder for Planning Services)



Councillor Barry Fairbank (Portfolio Holder for Environment)



Elmbridge Borough Council