

Michael Stallard

Written Statement in objection to ITEM 8 (Wintersells Road)

SCC PLANNING AND REGULATORY COMMITTEE, Thursday, 21 May 2020, 10.30 am

Dear Members

Thank you for the opportunity to speak in objection to this application. This is a waste scheme in the wrong location and it should be refused.

There have been 86 objections and both Local Authorities (Runnymede and Elmbridge) and the local Residents Association have objected, due to the potentially significant adverse effects in the locality.

The site is not allocated in the adopted Surrey Waste Plan (SWP) or Elmbridge Local Plan (ELP) (see O/R paras 95, 100). The wider area's designation as an Industrial Area of Search (ILAS) in the emerging Surrey Waste Plan is not an allocation ¹ for the application site nor the broader area given in the ILAS description. The ILAS designation covers a much larger area of 5 hectares and merely suggests the broader area might be suitable for a waste scheme. The County's own assessment of the ILAS is hardly positive in itself, with a range of adverse effects predicted in the emerging SWP for waste development in the ILAS.

At only 0.3ha, the site is called a 'small' site in the emerging SWP suitable for only up to 50,000 t/a of waste. However, the proposal is for just under 100,000 t/a which is double the County's own capacity suggestion. The applicant is squeezing far too much capacity into such a small site and it is no surprise therefore, that so many adverse effects on local amenity are predicted in the locality.

Being unallocated, the development is thus a departure from the Development Plan (DP). A range of adverse amenity effects have been predicted for the site and cause a conflict with a range of DP policies in the adopted SWP and ELP. Whilst some policies in the DP are supported by the scheme, there are many more that are not. The key, dominant policies in the DP are conflicted with and this mirrors the fact that this scheme is of too large capacity on this site, causing a number of adverse effects on local amenity. Notably, the officer's report has not addressed the required legal question of identifying, and assessing compliance with, the key and dominant policies in the DP, as WBP has in their objection. In my view, the development does not accord with the Development Plan overall. It is in conflict with the DP as a whole, which is the correct legal test.

In summary, this is a waste scheme in the wrong location and it should be refused. It does not accord with the Development Plan and there are no material considerations to suggest approval, including any policies in the NPPF. I urge you to reject the proposals - there are plenty of valid planning reasons for refusal and sufficient policy conflicts to warrant that refusal and to robustly resist any appeal.

Thank you.

¹ The draft SWP itself makes a continual, crucial distinction between 'allocated sites' and ILAS 'designated sites' through the Part 2 document and its associated Environmental Report (eg para 3.1.2, etc). ILAS are not allocations for the purposes of the Development Plan (see O/R paras 95, 100)

This page is intentionally left blank