Annex 5; Summary of Inspector's conclusions re ILAS and Sites

Issue/site	Summary of Inspector's conclusions ¹
Industrial Land Areas of Search (ILAS)	The ILAS Identification Report clearly demonstrates that the approach taken was thorough and robust. It represents a justified mechanism for the identification of these areas of search that is both open and transparent.
	The ILAS have been appropriately assessed as available, suitable and achievable. The extent of assessment undertaken in relation to the ILAS is proportionate and sufficient, in light of their existing land use planning designations and the identified requirement for further detailed assessment at the planning application stage.
	Whilst industrial land areas of search (ILAS) have been identified, it is clear from the evidence provided that these areas are not likely to be of sufficient size, or necessarily suitable in other ways, to support the extent of new strategic waste infrastructure development likely to be required to meet the identified need.
	Nevertheless, the ILAS represent an important positive component of the Plan's provision. They will have potential to meet the need for a range of uses, including specialist facilities, and will enhance the ability of the Plan to respond flexibly to changing demands and circumstances, including market forces, over time.
Allocated sites - general	From the evidence provided, the approach taken to the identification of the locations for new development was open and transparent and the methodology followed was clear and robust. It represents a reasonable and justified approach.
	The extent of land allocated represents a positive approach that has been adequately justified.
	The Transport Study represents a thorough and robust plan-level analysis of the potential capacity and highway management issues relating to the proposed allocations. The study supports the allocation of the sites proposed, with specific transport issues demonstrated to be reasonably likely to be addressed by identified project specific mitigation
	Overall, taking into account the range and extent of detailed assessment undertaken, together with the responses received, the proposed allocations are justified and strongly supported by a suitably robust and thorough assessment process. Furthermore, whilst these assessments have identified key issues for the development of the allocated sites across a range of matters none of these issues, either individually or collectively, indicate that the sites are unsuitable, in principle, for the development of some form of waste management facility.
Site 5.1- Land to the north east of Slyfield Industrial Estate	It is clear from the evidence produced that its development is largely proposed to accommodate the relocation of existing waste management facilities, including a wastewater treatment works, to facilitate the

¹ This is a selective summary. For the full context and other conclusions see the Inspector's report at Annex 1.

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	redevelopment of that existing site, as part of a wider regeneration proposal for the area
	The inclusion of this site under Policy 11a would be sound. There would appear to be some prospect that the site may also be able to accommodat some other waste management facilities
Site 5.2 – Former Weylands Treatment Works	The context of the site and issues such as deliverability, traffic impacts, air quality and odour, would present challenges to its suitable development. However, some form of development could be achieved, provided acceptable design and operation mitigation measures were in place, supported by a robust environmental impact assessment process, where required, and effective community engagement.
	The site would benefit from being improved and upgraded, which would also potentially enable greater control to be exercised over activities on the site through the planning system
Site 5.3 – Land adjoining Leatherhead Sewage Treatment Works	A number of issues have been identified in relation to its potential development, including in relation to access. These issues have the potential to be suitably addressed at the application stage of the development process, through the use of appropriate design and operational mitigation measures.
Site 5.4 – Oakleaf Farm, Stanwell Moor	Potential impacts on air quality and human health are not matters that would render the allocation unacceptable and are capable of being addressed at the application stage, subject to suitable design and operational mitigation measures.
	Having regard to the Transport Study, the Plan also states that a larger facility may be able to be accommodated, if suitable mitigation can be implemented, to allow all movements at the Horton Road/Stanwell Moor Road junction. From the evidence provided, this type of junction improvement is likely to be achievable. It is important to explicitly state that all site traffic must be prevented from using the route to the site through the nearby Stanwell Moor village.
Site 5.5 – Lambs Business Park, South Godstone	There is a reasonable prospect that transport issues can be overcome and that the allocation, with the modifications identified, is sound.
	As such, the approach taken within the Plan has been robustly justified and will positively support the effective delivery of development on the site.
Site 5.6 – Land adjacent to Trumps Farm, Kitsmead Lane, Longcross	Sufficient justification exists for the allocation of the site to meet the identified needs for a DMR facility in this location.
	The development of the site for a waste management facility of the overall scale proposed would be feasible, subject to satisfactory design and operation mitigation measures.
	The potential loss of some trees on the site and some areas of priority habitat would seem likely. However, details provided as part of the

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	Examination process, have demonstrated that a facility of the scale proposed could potentially be accommodated within the site, without the loss of ancient woodland and with potential to achieve biodiversity net gain

