

Godstone Parish Council

(incorporating the Villages of Godstone, South Godstone and Blindley Heath)

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Dear Sir

RE: The Surrey Waste Local Plan 2018-2033 - Period of representations (Regulation 19)

Godstone Parish Council wishes to strongly and robustly object to the Lambs Business Park in Tilburstow Hill Road being considered and included in the Surrey Waste Local Plan 2018 for the following reasons:

The site is still currently within the Metropolitan Green Belt and the most recent Green Belt Assessment shows that this area is performing a Green Belt function. Based on this assessment the local area is effective in preventing urban sprawl and has a role in maintaining separation between Blindley Heath and South Godstone.

Any application will need to demonstrate very special circumstances for any waste related development at the site. Any and every application should explain how the proposal would comply with the NPPF and Policy 9 – Green Belt.

The Lambs Business Park is within two miles of the SSSI site at Blindley Heath and within 1.75 miles of SSSI sites at Godstone as shown on the Surrey lmap. It is also within an area designated as Historic Landscape and bounding an Area of Great Landscape Value. Natural England is a statutory consultee on development proposals that might impact on SSSIs. When a consultation is received, the SSSI IRZs are used to make an initial assessment of the likely risk of impacts on SSSIs, allowing Natural England to quickly determine which consultations are unlikely to pose risks and which require more detailed consideration. The site falls within SSSI IRZs zones therefore a consultation relating to the likely impacts of development on SSSIs under Schedule 5 (v) of the Town and Country Planning (Development Management Procedure) (England) Order 2010 and section 28I of the Wildlife and Countryside Act 1981 (as amended) will be required. They do not alter or remove the requirements to consult Natural England on other natural environment impacts or other types of development proposal under the Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended) and other statutory requirements.

There are also SNCI sites nearby: Cloverhouse Meadows, Furze Wood and Maple Wood SNCIs. There are also pSNCIs nearby: The Mount and Old Hall Field is to the East.

There are ten examples of ancient woodland within 0.4 miles of the Business Park with Paragraph 109 of the NPPF highlighting the role of planning in protecting and enhancing valued natural features.

The site is in Tandridge Landscape Character Area 2015 WF3 and Bridleway 293 is within 250 metres of the site along with Bridleway 292 which is within 600 metres of the site.

Within close proximity is an oil extraction and storage facility which also involves the movement of oil by articulated Tankers.

Emissions from many different types of development can cause air pollution and/or dust affecting the habitats and species on SSSIs. Dust or particles can fall onto plants and physically smother the leaves,

affecting photosynthesis, respiration, transpiration and leaf temperature. There may also be toxicity issues (caused by heavy metals particles) and potential changes in pH (particularly if the dust is alkaline (e.g. cement dust)). Lichens can be directly affected by the dust (shading, chemical effects) or by changes in bark chemistry. Without significant investigation and modelling there can be no justification for any development of this site to take place.

Landfill and waste treatment can cause air pollution and affect local water supplies, which designated sites depend on. Landfill sites attract large numbers of gulls which can impact on birds (Predation). An MBWT plant can generate significant amounts of ammonia. At high concentrations ammonia is toxic to vegetation; it also deposits to ecosystems and causes nitrogen enrichment and acidification of soils and freshwaters. As is seen by the level of water in ponds and surrounding areas any pollution of water will have a widespread effect on trees and grasslands as in the categories previously mentioned.

Godstone village has a conservation area which is already deeply affected by current levels of HGV traffic feeding to and from Lambs Business park

Railway tunnel is within 360metres of the site with the tunnel air shafts a little further away and should any waste material be sucked either into the tunnel or shafts it would have serious implications on the railway.

The railway bridge immediately adjacent to Lambs Business Park on Tilburstow Hill Road is classed as a Restricted Bridge by Surrey County Council and over height vehicles have in the past blocked completely Tilburstow Hill Road.

It is an area with significant housing on all road approaches, with Carlton Road and Danemore Lane being on the southbound end of Tilburstow Hill Road, Godstone Village to the North and substantial housing at Bletchingley to the West via Rabies Heath Road. With the siting of Godstone Farm, a tourist attraction and children's zoo, bringing in a large amount of traffic throughout the year but particularly in the summer.

The southern exit of Tilburstow Hill Road onto the Northbound A22 (Anglefield Corner) is particularly dangerous for HGV movements, having had a number of recent accidents , as large vehicles turning North onto the A22 require the use of both north and south bound lanes, in addition only restricted sight lines are available to the driver particularly with regard to Southbound A22 traffic appearing from a bend in a 50mph speed limit area. Previous traffic investigations here have produced recommendations for Light controlled signals which have never been implemented.

In Tandridge District Council Local Plan 'Tandridge District Council Local Plan, Strategic Highway Assessment: Scenarios 2A-F, 2nd May 2018 (document no. 53613T42/07)' it is apparent that congestion in and around the whole area will be extreme particularly as the capability of the A22 to even deal with existing traffic is very poor.

Existing conditions are placed on Operating Licenses using Lambs as an Operating Centre and the Parish Council would seek a minimum of these conditions to be placed on any new License applications but in addition GPC would look to reinforce these restrictions in the future.

Whilst not on a floodplain TAN 125 Tilburstow Hill Road D395 is on the Surrey List of Wetspots with a priority of 6, recent subsidence of and damage to the road surface underlies the fragility of this road in even dealing with the current HGV usage for Lambs Business Park. Flooding in and around the business park is evident and flood defences must be included in any evaluation of the area.

Previously the excavations have been used for the disposal of railway track ballast then subsequently dug out for resale having been subject to a washing process to remove contaminants and hazardous material including asbestos used in train brakes or Creosote used in the protection of the sleepers but the area shows no evidence of any recent survey that the site is currently clear of contamination. Clearly in light of the recognition that hazardous and contaminated material has been in contact with this land a desktop assessment and site walkover study is not at all satisfactory and clearly would be open to challenge.

Surrey County Council has a clear duty to consider any waste development in association with any other proposed local development. W.T Lamb Holdings through LRM have published their intent to build a Biomass Generator and Data centres on this site. Emissions from combustion can cause air pollution affecting the habitats and species on SSSIs and could cause air pollution on SSSIs up to 10km away, particularly bearing in mind the height of the chimney is to be above train level at 17metres, which will dominate the landscape.

Whilst Tandridge District Council have included in their submitted Local Plan a housing site classified as a Garden Village, of some 4000 homes, to the East and directly opposite Lambs Business Park with an exit

road from the estate into Tilburstow Hill Road close to Terracotta Road. None of this appears in the summary of the site.

To summarise, Godstone Parish council confirm their strong objection to Lambs Business Park being included in this or any subsequent Surrey County Council Waste plan. It is clearly unsustainable and is against environmental and ecological recommendations. The site is within the Green belt and is located on a width restricted "D" road and any more HGV movements, which are already at an unacceptable level for such a narrow country road, would increase physical danger and be unsupportable. Increased waste activity on site will escalate the health and safety risks for residents over a large area from an environmental and noise aspect.

Godstone Parish Council (GPC) gives consent for their data to be used in accordance with statement 2 in the Surrey County Council Representation Form for Surrey Waste Local Plan 2018 (Regulation 19 – Period of Representations).

In addition, GPC also wish to be kept informed of the Surrey Waste Local Plan's progress.

With regard to legal compliance the Godstone Parish council concerns are centred around chapters 1 to 8 and include but are not limited to the following:

1.2.4.1 Surrey should not be considering waste from out of district for example it has been suggested that waste from Heathrow airport be accepted.

1.2.4.2 The strategic road network relies heavily on the A22 as an alternative routes in the event of problems on the M25 and M23, as currently witnessed by the diversions in place for current upgrading of the M23 to a smart motorway. In addition it is the route to enter/re-enter the M25 at Junction 6 which Highways England have stated will be at capacity by 2020. No recent detailed traffic survey appear to have been carried out and details supplied are reliant on historical information particularly in regard to HGV use of the A22 and the A25.

1.2.5.2 As shown in our comments above Lambs Business Park is within two miles of the SSSI site at Blindley Heath and within 1.75 miles of SSSI sites at Godstone so will have an effect on not just one but 3 split SSSI sites as well as SNCI sites for example The Mole Gap to Reigate Escarpment SSSI is located 8.4km from the site. In addition possible burning emissions are within reach of the Ashdown Forest.

1.2.5.4 Part of the line of existing surrounding roads to Lambs Business park are based on Roman Roads. GPC is the owner of Tilburstow Hill Common which is already being heavily affected and eroded by the existing HGV movements. The areas are designated Ancient Woodland and around the site are areas of historic landscape.

1.2.9.2 The site is in an area surrounded by rivers, streams and ponds.

1.3.3 Lambs Business Park has been used for landfill for such items as railway track ballast which was washed before being resold. No report has been produced on any existing contamination in the form of creosote, oil, asbestos from train brakes or even the current landfill operation of construction waste which may have involve plasterboard.

1.3.3.2 It is probably impossible due to the size and depth of the existing landfill area for SCC to establish what hazardous material is already present on this site.

1.3.4.1 GPC are concerned over reports of emissions from other UK waste burning sites where statutory emission levels are regularly breached. It is the intent of GPC to investigate the possibility of installing an emission monitoring system in the area to ensure any current or future breaches are notified.

1.3.7.2 The co-operation between SCC and Tandridge District Council is an area that our legal representation is investigating and comments will be presented to the Government Inspector at the Local Plan Inspection.

1.3.19.1 GPC considers that the submission of comments was low due to the methods used to advertise public participation were not prominent enough.

3.6.1 The disused Railway siding at Lambs business park could be considered a more sustainable method of transport but planning permission was not granted to reopen this and there appears to be no evidence that Network rail have been consulted in relation to reactivating the siding however points regarding the existing line have been presented.

3.7.1.5 Godstone Ward community are very much against the intensification of any activity at Lambs business Park and GPC have been urged to take whatever action is required to combat this.

4.1.1.3 Lambs Business Park is only currently involved with landfill by building waste combined with the intention to safeguard it as an employment site makes it entirely unsuitable for a CRC or waste to energy site.

5.2.1.2 We are a rural area and waste bins are crucial in keeping our green areas clear of rubbish. In inviting visitors to our area we require sufficient waste bins and their emptying to keep it clean.

5.2.2.2 No up to date traffic survey appears to have been carried out to establish movements along access roads to the Lambs site, particularly in respect to the locating a CRC. Existing restrictions mean residents do see a reduction in HGV and private car movements on Saturday and Sunday and GPC will try to ensure restrictions are placed on any CRC to stop traffic increasing at the weekend.

5.2.3.1 GPC strongly feels there is no case for Godstone to be used for SCC waste particularly with the inference that waste be imported from outside of the county.

5.5.1 The TDC Local Plan is not yet adopted and the removal of Lambs business park from the green belt is not certain. GPC's legal representation will be presenting a case at inspection that this should not occur.

Legal Compliance

Godstone Parish Council do not consider that the plan is compliant with the legal requirements of the Relevant Planning Acts and Regulations in as much as Traffic surveys and modelling is not current and does not take into account the current HGV and private car traffic in and around the A22, A25, M25 and in particular Tilburstow Hill Road. Combined with the fact that there are no plans from Tandridge District council showing any definitive roads and therefore there is no knowledge of traffic movements around the proposed building of 4000 homes in South Godstone which will severely affect all traffic to Lambs Business Park access.

Soundness

The strategy as outlined does not achieve sustainable development particularly on the matter of reliance upon road transport. Passing traffic already means the A22 is at capacity. Tandridge District Councils Local Plan mitigation work is restricted to Junction 6 of the M25 and A264 Felbridge Junction with access to Lambs Business park in the middle of these two points. Increase traffic in the form of refuse vehicles, Land fill trucks and HGVs carrying bales for burning will bring this major road to a stop to this M23 alternative routing.

Duty to cooperate

As is seen with differences of opinion and approaches over time Tandridge and Surrey are not aligned. The original Surrey County Council consultation was not well publicised in the area and many people were not made aware of this significant local development in their area. Godstone Parish council do not feel the duty to cooperate is successful.

Yours faithfully,

Mrs S Endersby
Clerk to Godstone Parish Council
On behalf of Godstone Parish Council