LAMBS BUSINESS PARK
POSITION STATEMENT

1. This Position Statement sets out the current status of Lambs Business Park, South Godstone, within the emerging Surrey Waste Local Plan 2019-2033 (hereafter SWLP). It has been prepared in response to a request made by the Inspector of the Tandridge District Council Local Plan (hereafter TDCLP) during the Matter 7 Hearing Session (employment land allocations), held on 10th October 2019.

2. This Position Statement has been jointly prepared by Surrey County Council and LRM Planning. Surrey County Council are the Waste Local Planning Authority. LRM Planning are promoting Lambs Business Park on behalf of the landowner, WT Lamb Holdings Limited.

3. It covers the following matters:
   - The policies and supporting text relevant to Lambs Business Park within the emerging SWLP;
   - The timetable for the remaining stages of the SWLP;
   - The purpose of the strategic allocations, including Lambs Business Park, as identified by the emerging SWLP; and
   - The Statement of Common Ground prepared by Surrey County Council and Tandridge District Council to inform the Examination in Public of both the SWLP and the TDCLP.

4. Each is addressed in turn below.

   The Surrey Waste Local Plan

5. The emerging SWLP is divided into two parts, with the proposed Development Plan policies falling within the Part 1 Plan and the Part 2 Plan establishing key development issues for each allocation, as well as illustrating the spatial extent of each waste management allocation.

6. The SWLP has now reached the Proposed Main Modifications stage. The consultation on the Proposed Main Modifications commenced on 13th January 2020 and runs until 23rd February 2020. The Waste Planning Authority are hopeful of adopting the SWLP in May 2019.

   The Lambs Business Park Strategic Allocation

7. Lambs Business Park is identified as an allocated site under Policy 11a of the emerging SWLP (Strategic Waste Site Allocations), wherein it is outlined that the site is proposed for removal from the Metropolitan Green Belt within the emerging TDCLP. The Policy requires that proposals on the Strategic Allocations demonstrate how the key development issues for each site as identified within the Part 2 Plan have been addressed.

8. Policy 11a is provided at Appendix 1 of this document.

9. The key development issues identified for Lambs Business Park as outlined in the Part 2 Plan are:
• The site's location within the Metropolitan Green Belt, although it is noted that the site is proposed for removal through the emerging TDCLP.

• Transport – It is noted that the site is accessed from Tilburstow Hill Road (D395), which links to the A22 (Eastbourne Road). Appropriate improvements to the Tilburstow Hill Road – A22 Junction will be required depending on the scale of the waste facility and the utilisation of the private railway siding. There is limited opportunity to increase the total number of HGV movements from the site and therefore any development proposals are likely to require the reopening of the existing railway opportunity.

• The key biodiversity constraints include:
  - The Mole Gap to Reigate Escarpment SAC, which is within 10km of the site;
  - The Godstone Ponds SSSI, which is located 2.5km from the site;
  - The Mole Gap to Reigate Escarpment SSSI, which is located 8.4km from the site;
  - Maple Wood SNCI, which is adjacent to the site;
  - Furze Wood SNCI is 0.2km to the north; and
  - The potential for Great Crested Newts to be present within the site.

• There are sensitive receptors (residential dwelling houses) located on Terracotta Road.

• The Surrey Area of Great Landscape Value designation is located to the north of the site.

• The South Park Conservation Area is located 0.4km to the north east, whilst the Lagham Manor Scheduled Monument is located 0.75km to the east.

• The site falls within the Gatwick Airport Aerodrome Safeguarding Zone.

10. The full extracts in relation to Lambs Business Park from the SWLP Part 2, including the Proposed Main Modifications and the Allocation Plan, are included within Appendix 2 of this Statement.

The Purpose of Allocations within the Surrey Waste Local Plan

11. As outlined within the Part 1 Plan, the Policy 11 allocations have been made to provide the certainty that there is a suitable quantum of land to meet the County’s waste management requirements up to the end of the Plan period.\(^1\)

12. After undertaking a robust site identification and assessment process, the County Council concluded that due to the extent of the Metropolitan Green Belt within Surrey and the lack of alternatives, there could be no certainty that sufficient land could be identified and developed to meet the need for additional waste management capacity, without allocating land within the Metropolitan Green Belt.\(^2\) The Waste Planning Authority consider that this analysis constitutes the exceptional

\(^1\) Para. 4.3.2.1 of the Surrey Waste Local Plan Part 1 Plan refers.

\(^2\) Paras. 4.3.2.3 and 5.3.3.2 of the Surrey Waste Local Plan refers.
circumstances to justify the allocation of sites within the Metropolitan Green Belt and will encourage the Local Planning Authorities within the County to consider making appropriate alterations to their Green Belt's boundaries to remove the SWLP's Policy 11 allocations, as and when local plans are reviewed. Accordingly, the proposed removal of the north west portion of Lambs Business Park from the Metropolitan Green Belt as proposed within the emerging TDCLP provides a positive response to the Waste Planning Authority's strategic need for new waste management facilities within the County and demonstrates the strong level of co-operation on strategic planning matters between both plan-making bodies.

The Statement of Common Ground prepared between the Waste Planning Authority and Tandridge District Council

13. In relation to Lambs Business Park, the Statement of Common Ground between the Waste Planning Authority and Tandridge District Council confirms that:

- The site is potentially suitable for a large-scale waste management facility with a capacity of up to and potentially beyond 120,000 tonnes per annum;
- The site is potentially suitable for a range of waste management types;
- The site is to be removed from the Metropolitan Green Belt in the emerging TDCLP;
- Tandridge District Council recognise that the County Council has allocated the northern portion of the former quarry area of Lambs Business Park for waste management purposes within the emerging SWLP;
- Proposals that seek to utilise the existing railway network and siding will be encouraged; and
- If proposals for a new Energy to Waste plant come forward in this location, if practicable, they should be designed to enable the use of surplus heat to serve the South Godstone Garden Community and the ongoing operations within the Business Park.

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3 Para. 5.3.3.9 of the Surrey Waste Local Plan.
4 Para. 6.8 of the Tandridge District Council Local Plan Document SDTCE22 refers.
TANDRIDGE DISTRICT COUNCIL - OUR LOCAL PLAN: 2033
WT LAMB HOLDINGS LTD
PARTICIPANT ID: 1185177
January 2020

Signed by ..........................................................(on behalf of the
Surrey County Council)

Signed by ..........................................................(on behalf of
WT Lamb Holding Limited)

Dated ..........................................................
Appendix 1
5.3.3 Policy 11a – Strategic Waste Site Allocations

5.3.3.1 The NPPF (2019) expects that local plans should include strategic policies, including those which allocate sufficient land to accommodate the development required to meet objectively assessed needs. The process of identifying sites for allocation within the Plan was undertaken with a view to the principles set out in the spatial strategy. The strategy recognises that although such land would not be the most preferred, otherwise suitable sites may come forward within the Green Belt.

5.3.3.2 The site identification process found that due to the extent of the Green Belt in Surrey and lack of available alternatives, that it would not be possible to avoid the allocation of land within the Green Belt. Consequently a number of the allocated sites, which were otherwise assessed as being consistent with the spatial strategy, are located within the Green Belt.

5.3.3.3 While the development of waste uses on land identified for employment and storage purposes by LPAs is encouraged under Policy 10, it is recognised that, due to commercial and practical considerations and competition from other land uses, such land cannot be wholly relied on to deliver the required waste management capacity over the Plan period. The allocation of sites under Policy 11a increases the potential for development to come forward that will contribute to the objectively assessed needs for waste management capacity in Surrey.

5.3.3.4 The sites proposed for allocation on land within the Green Belt are primarily comprised of land that has been subject to previous development or use. The land at Lambs Business Park is a former clay quarry that is subject to a requirement for restoration in accordance with an approved scheme, but is being considered for release from its Green Belt designation by Tandridge District Council through their Local Plan review.

5.3.3.5 The sites allocated under Policy 11a are:

- Land to the north east of Slyfield Industrial Estate, Guildford
- Former Weylands sewage treatment works, Walton-on-Thames
- Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead
- Oakleaf Farm, Horton Lane, Stanwell Moor
- Land at Lambs Business Park, Terra Cotta Road, South Godstone

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62 Paragraph 23 of the National Planning Policy Framework 2019
63 See Site Identification and Evaluation Report, January 2019
64 See background paper Delivering the Spatial Strategy, January 2019
5.3.6 A number of sites, currently allocated under policies in the Surrey Waste Plan 2008 and considered for inclusion in the new Plan at the draft stage (Regulation 18), have not been carried forward to the submission stage. Those sites (listed below) are all located within the Green Belt and comprise undeveloped land, the identified need was not considered to provide sufficient justification for the allocation of such land:

- Land to the west of Earlswood Sewage Treatment Works, Redhill
- Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey
- Land at Martyrs Lane, Woking

5.3.7 Planning applications for development at the sites allocated under Policy 11a will be judged on their individual merits and the allocation of a site in the Plan does not mean that a proposal for a waste use will automatically be granted planning permission. Proposals for development on allocated sites will be expected to address the key development issues identified for each allocation in Part 2 of the Plan.

5.3.8 Proposals for development on allocated sites located within the Green Belt will, at the time at which a planning application is submitted, need to address the requirements of relevant Green Belt policy at the national and local levels.

5.3.9 Sites allocated for waste management use in the Green Belt have been through a process of alternative site assessment at the plan making stage. Having demonstrated exceptional circumstances to justify the allocation of strategic sites in the Green Belt, the county council will encourage the LPAs to consider making appropriate alterations to the Green Belt’s boundaries as their local plans are reviewed.

5.3.10 In the absence of changes to the boundaries of the Green Belt all planning applications for inappropriate waste related development on allocated sites within the Green Belt will need to demonstrate very special circumstances. Such very special circumstances would include the fact that allocation of the site for waste management purposes was deemed acceptable under the terms of the Plan.

- An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Waste Development.
- The availability of other suitable deliverable sites outside the Green Belt including those identified under Policy 10.
- Other site specific considerations dealt with under policies including Policy 14 – Development Management) and Policy 15 – Transport and Connectivity).

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65 Guidance on alternative sites assessment is available on the Help and guidance notes for making planning applications webpage
Policy 11a – Strategic Waste Site Allocations

Planning permission will be granted for the development of facilities to meet identified shortfalls in waste management capacity in Surrey at the following locations:

A. On land outside the Green Belt:
   i) Land to the north east of Slyfield Industrial Estate, Guildford

B. On previously developed land within the Green Belt:
   i) Former Weylands sewage treatment works, Walton-on-Thames
   ii) Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead
   iii) Oakleaf Farm, Horton Lane, Stanwell Moor

C. On land proposed for removal from the Green Belt:
   i) Land at Lambs Business Park, Terra Cotta Road, South Godstone

Proposals for development will need to demonstrate how the key development issues for each site have been addressed.

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Table 18 Monitoring for Policy 10 – Areas suitable for development of waste management facilities and Policy 11a – Strategic Waste Site Allocations

<table>
<thead>
<tr>
<th>Measure/Indicator</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of new waste facilities delivered on allocated sites.</td>
<td></td>
</tr>
<tr>
<td>Number of new facilities delivered on unallocated sites in locations specified by Policy 11.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Data Source(s)</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning Applications and Decisions.</td>
<td></td>
</tr>
<tr>
<td>Appeal Decisions.</td>
<td></td>
</tr>
<tr>
<td>Other sources of data as indicated in the Annual Monitoring Report.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Key Organisation(s)</th>
<th>Details</th>
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<tbody>
<tr>
<td>Waste Planning Authority.</td>
<td></td>
</tr>
<tr>
<td>Waste Industry.</td>
<td></td>
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<tr>
<td>Development Industry.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Target(s)</th>
<th>Details</th>
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<tbody>
<tr>
<td>100% of new development is developed in suitable locations.</td>
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<table>
<thead>
<tr>
<th>Trigger</th>
<th>Details</th>
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<tbody>
<tr>
<td>Insufficient number of new waste management facilities being developed which suggests that the plan is unable to meet the demand for new or enhanced facilities.</td>
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</tbody>
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66 This site known as ‘Lambs Business Park’ is proposed to be taken out of the Green Belt through the Tandridge Local Plan
Appendix 2
The site boundary shown on this map is indicative.
Lambs Business Park, Terra Cotta Road, Tilburstaw Hill Road, South Godstone

<table>
<thead>
<tr>
<th>Available Area</th>
<th>Approximately 3.0 ha (this is a minimum and could be extended)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Description and context</td>
<td>The site comprises former clay pits to the west of South Godstone. The clay pits are in the process of being restored in accordance with an approved reclamation scheme. The site shares an access with the adjacent business park located on the site of the former brickwork buildings. The site is bounded to the north by the Redhill to Tonbridge railway and includes a disused rail siding. Through the emerging Local Plan the site (along with the land to the south and the adjoining business park) is being proposed for release from the Green Belt as suitable for employment development.</td>
</tr>
<tr>
<td>Type</td>
<td>Suitable for a full range of potential waste management facilities. Based on the findings of the HRA for the plan the site may be suited for a small, medium or large scale thermal treatment.</td>
</tr>
<tr>
<td>Indicative scale</td>
<td>Medium (to large) size unless rail sidings can be utilised in which case a large scale facility may be suitable.</td>
</tr>
</tbody>
</table>

Key development issues:

| Green Belt | The site is within the Green Belt but proposed to be removed through the emerging Tandridge Local Plan. |
| Transport | The site is accessed from Tilburstaw Hill Road (D395), which links to the A22 (Eastbourne Road) to the south, east and north. Appropriate improvements to this junction will be required depending on the scale of the facility and utilisation of rail. Proposals that seek to utilise the existing rail network and siding in order to support sustainable transport patterns will be encouraged. Transport by road is restricted with little opportunity to increase total HGV movements using the business park. Any large scale waste use is therefore likely to require the reopening of the existing rail sidings in order to utilise the rail network. |
| Biodiversity | The Mole Gap to Reigate Escarpment SAC is located within 10km of the site. The Godstone Ponds SSSI is located 2.5km from the site, and the Mole Gap to Reigate Escarpment SSSI is located 8.4km from the site. Maple Wood SNCI (an Ancient Woodland) adjoins the site and Furze Wood SNCI is 0.1km north of the site. Great crested newts are recorded nearby and likely to be present on the site. |
| General Amenity | There are sensitive receptors (housing) situated along the access road to the site (Terra Cotta Road). |
| Landscape | The Surrey Area of Great Landscape Value designation commences immediately to the north of the site, and the site is sensitive in terms of landscape character and visual amenity. |
| Heritage | The South Park Conservation Area is 0.4km north east, and a Scheduled Monument (Medieval moated site, Lagham Manor, South Godstone) is 0.75km east. |
| Aerodrome Safeguarding | This site falls within the airport safeguarding zone of Gatwick Airport. |

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26 Subject to it being demonstrated by a project level Appropriate Assessment that emissions of nutrient nitrogen from the proposed facility would contribute no more than 1% of the site relevant Critical Load for the most sensitive habitat of the Mole Gap to Reigate Escarpment SAC or that there would be no significant adverse impact on the ecological integrity of the SAC.