

## **Draft response to Surrey Minerals Plan DPD Publications stage Representation Form for Aggregates Recycling**

### **B3 Statement to support your view**

I believe the DPD to be unsound for the following reasons.

#### Re Charlton Lane site

The plan has given inadequate weight to a number of important considerations which weigh against the inclusion of the site in the Plan. These are:

1. The site is currently a busy Community Recycling facility and Waste Transfer Station. In this role it generates a significant amount of vehicle traffic in one of the busiest parts of Surrey. It is recognised in the Plan that the only access is via the A244, a road which, according to SCC's own data, has operated at over 100% of capacity for the last decade, i.e. it is unacceptably congested. The addition of a substantial number of HGV movements in and out of the site will add an unreasonable amount of traffic on busy suburban roads on a permanent basis.
2. The site is in an Air Quality Action Zone, a relatively short distance from the area of greatest particulate emissions in Surrey around Sunbury Cross. The implications of both the recycling workings and the heavy lorry traffic can only exacerbate this since the prevailing wind will carry any emissions directly towards the densely populated areas of Lower Sunbury, Sunbury Common and South-West London.

#### Re Watersplash Farm

The plan has given inadequate weight to a number of important considerations which weigh against the inclusion of the site in the Plan. These are:

1. The site is within 2km of the Charlton Lane site, proposed as a permanent Aggregates Recycling site. There is no reason why a second recycling facility is required within such a short distance, and it is unreasonable for two such sites to be operating in such close proximity, bearing in mind the impact of such workings on residential communities which surround both sites.
2. The report recognises that the amenity of residents to the west and north of the site will be an issue.
3. The report recognises the likely impact of lorry traffic on the A244 which would provide access to and from the site – as noted above, this is a well-known traffic congestion black spot, providing as it does a strategic route between Walton Bridge, the M3 and Heathrow Airport.
4. The report recognises the likely high noise levels in adjacent Gaston Bridge Road, and the effect of the prevailing wind in carrying noise to the areas immediately to the north and north-west, i.e. the residential districts of Lower Sunbury and Halliford, both including Conservation Areas. It states that acceptable mitigation will be challenging. We take this to be management-speak for “impossible”.
5. The report states that the intensification of HGV traffic will require careful consideration and design. This is also taken to mean that its impact would be unacceptable, and that nothing can be done about this.
6. The report recognises that sites which are open and lacking in any shelter are likely to be susceptible to dust blow. Watersplash Farm is exactly such a site, and the building of the size of structure required to house recycling activities would be inappropriate in terms of visual impact in this location.

It is clear from the above that the sites have been included despite significant and obvious criteria on which they should have been excluded. On this basis, we consider the DPD unsound.

### **B4 Changes which you deem necessary**

The Charlton Lane and Watersplash Farm sites should be removed from the DPD.