

Rosie Sterry
Principal Policy Development Officer, Planning Policy
Reigate & Banstead Borough Council

By Email Only

21st November 2017

Dear Rosie,

Re: Land at Former Copyhold Works, Redhill

Thank you for the opportunity to discuss the proposed allocation for circa 210 residential units, a 2 FE primary school and 53 units for retirement accommodation for older people at the meeting that was held at our offices on 25th October 2017. Whilst it was a useful exercise to have the relevant parties discussing the issues, having considered the matters raised it did not provide any reassurances to Biffa that the proposed allocation would be an acceptable use of land in such close proximity to an existing strategic landfill facility without causing undue harm to its operation.

Having reviewed the report that was presented to the Executive Committee on 9th November 2017, I note the inclusion of a phasing policy related to the release of urban extensions for development, which in turn is dependent on the outcomes of the Council's annual review process. The explanation text relating to that policy states that delivery of sites ERM2/3 is dependent on the 'closure' of the landfill, however 'closure' is not defined within the accompanying text and we have not been consulted to this effect.

As we discussed at the meeting, whilst the existing planning permission is for operations to continue to 31st December 2030, it is by no means certain that operations would be completed within that timeframe due a number of considerations that are beyond the control of Biffa.

It is not clear within the Consultation Statement how the Council has set out to address the reasons for our objections that were submitted in October 2016. Page 618 of the Consultation Statement presents the following response to a third party comment (not submitted by Biffa):

"The Patteson landfill is, as you have noted, set to close down sometime towards the end of the plan period, and will then be fully rehabilitated. This will provide for open space for the community, and should attempt to deal with odour issues. When a planning application comes forward for the site next to the former landfill, it will need to be demonstrated that odour and traffic issues can be dealt with satisfactorily."

This statement is factually incorrect: the site cannot be fully 'rehabilitated' by the end of the Plan period (2027), given the duration of the planning permission and the long-term requirements of the Environmental Permit. In order to secure a deliverable allocation, these matters need to be considered at this stage in order to determine the suitability of the land for accommodating this development. The Council's assumptions regarding the landfill are misleading and are not founded on a comprehensive understanding of the operation, nor have those assumptions been based on a full and proper consultation with Biffa.

An additional concern is the timescale for the production of the DMP. Our initial objections were submitted in October 2016 and only in October 2017 was a meeting and site visit initiated. To the best of my understanding, that is the first opportunity that both Gallagher's and the Council have had to visit the site. Shortly after the meeting, in early November 2017 a report was published to the Council's Executive Committee to approve the Reg 19 for publication in January 2018 for a 6 week consultation period. It is therefore not clear how the meeting could have been useful to the Council in the production of this Plan, given our concerns over the inaccuracies in the understanding of the operation.

The documentation presented to the Committee states that the "*full suite of documents including evidence base and sustainability appraisal will be submitted to the Secretary of State by the end of March 2018.*" These timescales do not allow for substantial amendments to be considered as a result of the forthcoming consultation or through further discussions/meetings that may take place between Biffa, Gallagher's and the Council.

One final point is to emphasise the regional, strategic importance of this facility. Redhill accept significant quantities of waste from London and elsewhere in the region and, as landfill capacity continues to rapidly decline, Redhill will become even more important to managing the regions residual waste. Redhill also incorporates the only hazardous waste landfill cell in the region and this should be safeguarded and utilised to its best capacity.

Biffa will remain engaged in the consultation process, however we will be maintaining our strong objections to this development allocation and pursuing those through the Local Plan Inquiry/Examination if necessary, where we will argue that without full and proper consideration of the impact of this allocation upon the landfill facility, that the Plan is unsound. This letter is also copied to Gallagher's and their representatives, and to Surrey County Council.

If you require clarification on any of the above or enclosed, please do not hesitate to contact me on 07734 877562.

Yours faithfully
For Biffa Waste Services

Cc Darren Mace, Gallagher Estates
 Sarah Griffiths, Gallagher Estates
 Michael Knott, Barton Willmore
 Craig Pettit, Barton Willmore
 Emma Arnold, ERM
 Samantha Murphy, Surrey County Council
 Paul Sanderson, Surrey County Council
 Simon Elson, Surrey County Council