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1 September 2025

Dear Sirs

Crosswinds – Guildford Crown Court Claim No M00GU195

I am writing to you on behalf of Salfords and Sidlow Parish Council. Salfords and Sidlow is a civil parish within the borough of Reigate and Banstead. The parish occupies most of the rural area between Reigate/Redhill and Horley. Salfords village lies approximately 3 miles south of Redhill astride the A23. Sidlow Village lies to the west of Salfords and south of Reigate on the A217. The Parish Council represents a population of about 3,500 of which 2,700 are electors.

The named Crosswinds site is located within our parish and the activities which have taken place have a detrimental impact on our residents.

We write this representation in support of the application by Surrey County Council in relation to the breach of planning control on the land lying north west of the junction of Collendean Lane and Ironsbottom Norwood Hill, Surrey RH6 0HS, a parcel of grassland approximately 2 km south east of Horley and 5.6 km south of Reigate in Surrey.

On the 27th of June 2024 we advised Surrey County Council that the land was in receipt of waste soils. We had received several reports from residents of a recommencement of waste activity on the land in a repeat of the unlawful activity in 2021. Many lorries were observed on Ironsbottom and Horse Hill coming in and out of the site by residents.

We advised residents of the temporary stop notice served on the 6th of August 2024. At least one Parish Councillor observed lorries continuing to go in and out of the site with no apparent cessation of unlawful activity. Surrey County Council advised of a further temporary stop notice attached to the site entrance gate on the 16th of August 2024. Residents advised the Parish Council and Surrey County Council of the continued unlawful activity beyond that date.

The temporary stop notice expired on the 1st of October 2024. Residents began notifying both us and Surrey County Council alleging further deliveries of waste recommencing. The volume of lorries entering and exiting the site over the weekend of the 19th of October 2024 was extremely significant. The area of land which had been disturbed inside the site ensured that the lorries collected extensive mud beneath their wheels which they transferred to the entrance and the roads immediately outside. We were advised that many lorries were observed after this date travelling along Ironsbottom and Horse Hill fully loaded and entering the site leaving shortly

thereafter empty.

We were continually briefed by Surrey County Council as to their efforts to try to get the unlawful activities stopped. It's clear in the statement from Mr Pugh that the council attended the site frequently in October and provided extensive evidence of the enforcement notice in place.

We would draw your attention to the nuisance caused by a huge volume of lorrie's travelling at speed along Ironsbottom and Horse Hill from early in the morning until late at night day after day. We were told by residents that many of these lorries were observed to have the Fullers logo on their sides, residents reported between 10 and 20 of these lorries entering and leaving the site on a daily basis. It is beyond comprehension that a firm of the size of Fuller Grab Hire Limited would not have been aware that the site had no planning permission for waste disposal.

We note that there is an obvious financial benefit to disposing of commercial construction waste in an unlawful manner. Payments to the owner will be significantly cheaper to recognise the risk of the activity being discovered and a remedy required. We also note that 80% of the land area is now said to be contaminated with unknown waste, with the land raised as much as by one meter in many areas. There has no obvious reason for deposit of materials in this volume. Without any satisfactory explanation it can only be agreed that it is purely for disposal reasons with its associated pecuniary advantage set off.

It is essential that the land is restored to its original agricultural nature, to ensure that there is no risk of leaking of any contamination into the local water courses. We would further add that there has been further ongoing activity on the site with heavy equipment continuing to spread the contaminated soils.

We understand that the scale of the restoration works required to rectify any harm caused by the activity will be substantial. However, the offenders here are not innocent. Identical activity was stopped in 2021 at some cost to Surrey County Council in time effort, etc., however the owners failed to restore the land then and seemingly were encouraged by the lack of full enforcement to renew the activity in 2024. A failure to require restoration now will only continue to encourage all of the defendants.

Mr Pugh's affidavit indicates at length how the breach of planning control is contrary to policies of the development management plan of both Reigate and Banstead Borough Council and Surrey County Council. No attempt has been made in the last five years to secure planning consent and we can only assume that the defendants are well aware that it would not be obtained.

We agree with Surrey County Council that it's important to recognise the importance of upholding confidence in the planning system (including enforcement) as an aspect of public interest. We echoed the request from Surrey County Council for a mandatory and prohibitory final injunctive order to ensure that the harm to the site is adequately addressed rectified and that all parties understand that their unlawful behaviour has consequences.

We hope our comments will be considered by the court.

Yours faithfully



Claire Minter
Clerk to Salfords and Sidlow Parish Council

CC:
County Cllrs Andy Lynch and Helyn Clack