

MINUTES of the meeting of the **PLANNING AND REGULATORY COMMITTEE** held at 10.30 am on 29 June 2020 as a Remote meeting.

These minutes are subject to confirmation by the Committee at its next meeting.

Members:

*= in attendance

Mr Tim Hall (Chairman)
Mr Edward Hawkins (Vice-Chairman)
Mr Saj Hussain
Mrs Mary Angell
Mrs Bernie Muir
Dr Andrew Povey
Mr Keith Taylor
Mrs Rose Thorn
Mr Stephen Cooksey
Mr Ernest Mallett MBE
Mrs Penny Rivers*

1/20 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

Apologies for absence were received from Mary Angell. Yvonna Lay substituted for Mary Angell.

2/20 MINUTES OF THE LAST MEETING [Item 2]

The Minutes were approved as an accurate record of the previous meeting.

3/20 PETITIONS [Item 3]

There were none.

4/20 PUBLIC QUESTION TIME [Item 4]

There were none.

5/20 MEMBERS' QUESTION TIME [Item 5]

There were none.

6/20 DECLARATIONS OF INTERESTS [Item 6]

Andrew Povey declared a non-pecuniary interest as a trustee of the Surrey Hills Society.

Edward Hawkins declared that he had received a number of letters from residents relating to item 7 on the agenda and confirmed that no responses were sent. The Chairman noted that this was likely to be the case for the whole Committee.

7/20 MINERALS & WASTE APPLICATION WA/2019/0796 - LOXLEY WELL SITE - LAND SOUTH OF DUNSFOLD ROAD AND EAST OF HIGH LOXLEY ROAD, DUNSFOLD, SURREY [Item 7]

Officers:

David Maxwell, Senior Planning Officer
Caroline Smith, Interim Planning Group Manager
Stephen Jenkins, Interim Planning Development Manager
Richard Cooper, Transport Development Planning Officer
Nancy El-Shatoury, Principal Lawyer
Joss Butler, Committee Manager

Speakers:

Sarah Goodwin made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 1.

Tom Gordon made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 2.

The Chairman was informed that the live stream of the meeting had stopped and therefore adjourned the meeting from 10:47am to 10:47am when it was resumed. The Chairman asked Tom Gordon to repeat his representation in objection to the application.

Ashley Herman made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 3.

Chris Britton made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 4.

John Gray made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 5.

The Chairman was informed that the live stream of the meeting had intermittently stopped and therefore adjourned the meeting from 11:11am to 11:28am to allow officers to investigate the issue. Once the meeting was resumed, the Chairman asked John Gray to repeat his representation in objection to the application and Nigel Moore to restart his response.

The Planning Agent / Applicant, Nigel Moore, Matt Cartwright and Stephen Sanderson made the following comments in response:

- That the remoteness of the site was key to mitigating noise, sounds or air emissions and that the wellsite would be enclosed by new native tree planting and areas of rewilding.
- That there would be no more than 10 Heavy Goods Vehicles (HGVs) per day which would add up to one HGV movement per hour and Banksman would be used where possible. During construction and movement of a drilling rig, temporary traffic lights would be used with wait times of up to 90 seconds.

- No HGVs would be used on a Saturday afternoon, Sunday or bank holiday which meant that High Loxley road would be kept free for any events at High Billingham Farm.
- That County Planning Officers find the proposal acceptable as outlined in the report.
- That exploration at Loxley would help the United Kingdom to rein in overextended supply chains and return vital raw materials needed for the country's economy.
- That achieving net-zero emissions in 2050 required economic resilience in 2020 which would only come if British businesses were backed.
- That the same construction techniques and site operations used at the Horse Hill Well Site would be used at Loxley.
- Local residents had been briefed on the planned activities and environmental practices of UKOG and that the site would be fully restored at the end of the planning period.

The Chairman was informed that the live stream of the meeting had stopped and therefore adjourned the meeting from 11:39am to 11:40am. Once the meeting was resumed, the Chairman asked Matt Cartwright to begin from his last main point which was regarding local residents being briefed on UKOG's planned activities.

- As far as possible, local manufacturers and service providers would be used to ensure economic benefits were kept in the local community.
- That UKOG were in regular contact with the Environment Agency, the health and safety executive and the Oil and Gas Authority.
- That the Environment Agency had recently approved the permit for Loxley.
- That UKOG wanted to be a positive force in the community.
- That a review of recent small earthquakes by the Oil and Gas Authority, British geological survey and academic experts concluded that they were naturally caused.
- The wellsite would be installed to the highest standard.
- That the country controlling its own supply of gas would help control local prices and address fuel poverty and ensure manufacturing was globally competitive.
- That Loxley was a sensible and sustainable development in the public interest.
- That UKOG was a Surrey company employing mostly local people.
- That UKOG's practices met the high standards of the Environment Agency.
- That Loxley could help fund a post Covid-19 recovery
- That using indigenous gas had several benefits compared to using imported gas.
- That oil and gas had helped the country survive the pandemic via Personal Protective Equipment (PPE), incubators, ventilator pipes, drip tubes and more which were made from petroleum products.
- That future Loxley gas would be fully compliant with net zero and Surrey's climate emergency.

The Local Member, Victoria Young, spoke for three minutes and made the following comments:

- That she was speaking on behalf of all other local residents including those soon to move to Dunsfold Park Garden Village.
- That local residents most valued the beauty and tranquillity of the environment.
- That the local community would be deeply affected by the proposed development.
- That the local Gypsy and Traveller community had not been consulted and only became aware of the proposal in the previous week.
- That the loss of the local wedding venue would have a significant effect on local businesses that service it.
- That a Cancer Awareness Festival which works to support the NHS would no longer be feasible in Surrey if the development takes place.
- That the site was an Area of Great Landscape Value (AGLV) location.
- That the impact of large vehicles on rural roads cannot be underestimated.

Key points raised during the discussion:

1. David Maxwell, Senior Planning Officer, introduced the report and provided Members with a brief summary. A supplementary agenda was published on 29 June 2020 which included an update sheet for the item. Additional representations are attached to these minutes as Annex 6, 7, 8, 9, 10, 11, 12 & 13. Members noted that the proposal for the construction, operation and decommissioning of a well site for the exploration and appraisal of hydrocarbon minerals from one exploratory borehole (Loxley-1) and one side-track borehole (Loxley-1z) for a temporary period of three years involving the siting of plant and equipment, the construction of a new access track, a new highway junction with High Loxley Road, highway improvements at the junction of High Loxley Road and Dunsfold Road and the erection of a boundary fence and entrance gates with restoration to agriculture. Members noted that the County Highway Authority had raised no objections to the application subject to conditions. Over 600 representations had been received of which 84% were in objection to the development. The full report and annexes are located from pages 7 of the meeting's agenda.
2. Members felt that the local highway was incompatible for the vehicle movements required for both the local events business and the proposed development. Members went on to raise concerns related to the quantity and nature of the vehicles required for the local event company and when they would be used. Officers highlighted that the local events company had previously produced a transport assessment which had been recently updated and indicated that there would be 120 arrivals over the actual day of the event, with five to ten movements the day before and after the event. Officers further stated that the number of movements on the highway on days without any events was extremely low. Members noted further details on the vehicle movements included within the proposal and the localised widening to the lane as conditioned in the report.

3. Members asked for further detail on the process of enforcement and consequences to sites not following agreed travel plans. Officers confirmed that the breach of condition notice could be issued to the operator which could lead to prosecution.
4. Members stated that they felt the report underplayed the importance of the site being designated as part of the AGLV.
5. Members asked for clarification on the current situation following the council previously agreeing that AGLV designation would be treated the same as Area of Outstanding Natural Beauty (AONB) designation. Officers highlighted that this matter had been assessed in the officers report in paragraphs 335 – 340 and that the adverse impact would be moderate and not significant.
6. Officers confirmed that they had taken the view that informing the Surrey Gypsy and Traveller Forum was suitable for notifying the local Gypsy and Traveller community. A site notice was also placed 300m to the south of the entrance to the traveller site for one year. Officers further stated that the impact on the Gypsy and Traveller community had been assessed in the report and considered acceptable.
7. In regards to the visual aspects of the proposal, officers confirmed that they felt they were acceptable due to the significant mitigation measures which would be put in place which would ensure the impact would not be significant.
8. Members raised further concerns that HGVs would not follow the approved route agreed with officers. Officers reassured Members that there were a number of options available to monitor this which included the use of CCTV and vehicle trackers.
9. Members stated that they believed there should be some form of air quality management due to the emissions which would be produced from the site. Officers stated that the Air Quality consultant had raised no objections to the proposals and therefore no conditions were in place regarding air quality.
10. Members felt it was required to secure a substantial bond for the use of road repairs following the use of narrow lanes by HGVs from the site and the risk of damage. Officers stated that if damage is caused to the local highway by the proposals then the council can require the applicant to repair it.
11. Members highlighted that there was a large pool of water on the way to the site and asked whether, if not properly removed, a wheel wash facility would be required. Officers confirm that this was not usual practice for these types of proposals and given the length of the proposed access track, they did not consider a wheel wash facility to be necessary.
12. Regarding local traffic, Members highlighted that the site's hours of operation may interfere with the busy school drop off and pick up hours. Officers confirmed that the applicant had stated that HGV movements would avoid peak periods and would be spread out across the 12-hour day.
13. A Member of the Committee stated that before consent was granted the Committee needed a definitive traffic management plan to fully understand the impacts of the proposal.
14. Members asked how considerable the impact of the proposal would be on the local economy. Officers stated that the report did take into

account the local economic impact and that they were mindful of the noise impacts when taking the proposal into consideration. Officers also noted that Informative 20 stated that the applicant would liaise with local businesses to minimise any impact on business.

15. Officers stated that they did not consider bunching of HGVs to be a significant risk due to the low number of HGV movements per day, the Transport Management Scheme and the use of Banksman at all times.
16. Members noted details of HGV turning circles on highways and the mitigations to be put in place to reduce the risk of damage to highway verges.
17. Members raised concerns regarding potential changes to the AONB boundaries. Officers stated that no decisions had yet been made and were not aware of when further detail would be published.
18. In regard to references to European Union (EU) in the report, officers confirmed that although the United Kingdom had left the EU, it was still bound by its laws up to the end of the transition period.
19. A Member of the Committee recommended that the application be deferred until full information was provided on the transport elements including the section 278 agreement and detail on the vehicle tracking.
20. Cllr Rivers moved a motion for refusal due to the adverse impact on the local community and businesses, local road system and the upcoming housing within Dundsfold Garden Village. It was also stated that the proposal would conflict with the council's commitment to the climate change emergency. The Member further stated that the recent pandemic meant that local businesses should be supported more than ever and that the potential harms outweighed the potential benefit. Cllr Povey seconded the motion for refusal.
21. Officers stated that they were concerned with the level of detail discussed around highways which was an issue for the County Highway Authority. Officers further stated that Planning Law required that Members should focus on whether the application was in accordance with the development plan unless there are material considerations which indicate otherwise. Further to this, Officers reminded Members that local opposition or support was not grounds for refusal or granting and that Cllr Rivers' reasons for refusal were not valid planning reasons. Officers also restated that the County Highway Authority had raised no objections to the proposal and that it was not unusual to accept a framework traffic management plan with details to be submitted later. Members noted that the Committee needed to be satisfied there were no significant adverse impacts arising from the development and that it was officers' view that there were not.

The Chairman adjourned the meeting at 13:37pm until 14:18pm.

22. The Chairman asked Cllr Rivers and Cllr Povey to clarify their reasons for refusal. Cllr Rivers stated that she proposed refusal for the following reasons:
 - a. Significant adverse impact on the locality, specifically on highways for reasons of safety and potential damage
 - b. Impact on the residential community and business
 - c. That there was no demonstrable benefit from the proposal

23. Officers restated that the County Highway Authority were satisfied with the proposal and that the HGV movements were 20 maximum per day. The noise was within acceptable limits and was addressed in the officer's report. Matters regarding air quality would be addressed within the Environment Agency permit and the need for the development was established in Government energy and planning policy.
24. Cllr Povey stated that the reasons for refusal should be the following:
 - a. That the need for drilling had not been established and that the reference to the general Government policy was not being sufficient.
 - b. That Surrey Highway's Officers had declared the route unsuitable for HGVS and had placed signs displaying this in the area and anti-slip surfaces on various bends.
 - c. That the applicant site was within the AGLV
 - d. The impact on the local businesses and economy
25. A Member of the Committee felt that the discussion on this application was disturbing and highlighted to Members that if the application was refused on non-planning reasons then the cost of appeal, if successful, would be significant. Further to this in regards to the motion for refusal, the Member stated that there was a lack of highway reasons, that citing impact on businesses was not logical, that oil wells were regulated nationally, that nothing can stop clear felling of woodland if a licence was granted for that, and that the public had provided an emotional response.
26. A Member of the Committee stated that they believed it was the right choice to refuse the application and that Members should not be discouraged by the risk of the decision being overturned at appeal. The Member further highlighted that the number of objections to the application and the lack of consultation with the local Gypsy and Traveller community.
27. The Chairman called the motion for refusal which received 6 votes for, 5 votes against and no abstentions. Therefore the motion was carried.
28. The Principal Solicitor stated that there was a need to clearly set out and confirm the reasons for refusal. The Chairman agreed to adjourn the meeting to enable Planning Officers to collate a summary of planning reasons for refusal following discussions at the meeting.

Keith Taylor left the meeting 15:07pm

The Chairman adjourned the meeting from 15:07pm to 15:27pm

29. The Chairman asked Members to vote on the following reasons for refusal:
 - a. It has not yet been demonstrated that there is a need for the development nor that the adverse impacts in respect of Highways, noise, lighting and air quality will not be significant contrary to policies MC12, MC14 and MC15 of the Surrey Minerals Plan 2011.
30. The Chairman moved the confirmation vote on the motion for refusal of the application for the reasons outlined in paragraph 29a of these minutes which received 9 votes for, 1 vote against and no abstentions. Therefore the motion was carried.

Actions / further information to be provided:

None.

Resolved:

That the Committee REFUSE application WA/2019/0796 due to the reason that It has not yet been demonstrated that there is a need for the development nor that the adverse impacts in respect of highways, noise, lighting and air quality will not be significant contrary to policies MC12, MC14 and MC15 of the Surrey Minerals Plan 2011.

**8/20 MINERALS/WASTE EL18/3802 WO2018/1358 - UNITS 11 AND 12
WINTERSELLS ROAD, BYFLEET, WEST BYFLEET, SURREY KT14 7LF
[Item 8]**

Officers:

Katie Rayner, Senior Planning Officer
Abigail Solway, Transport Development Planning Officer
Nancy El-Shatoury, Principal Lawyer
Joss Butler, Committee Manager

Speakers:

John Tadros made representations in objection to the application. The following key points were made:

- That Wintersells Management Limited was the management company which owned the road which provides access to the around 40 small businesses.
- That the objections from the small businesses were well founded and critical to the wellbeing of the business that required adequate access.
- That 200 HGV movements per day was excessive and that the roads were originally designed for ad hoc access.
- That in the event the roads of the estate were blocked then his business would not be visible to the traffic approaching the main road.
- That Elmbridge and Runnymede Council had rejected the size of this application stating clear the harm to the business park
- Surrey County Council's site assessment document identifies that the estate should only have 50,000 tonnes of waste per annum. This application is double the recommendations and does not take into account skip allocation.

Michael Stallard made representations in objection to the application. The speech which was presented to the Committee is attached to these minutes as annex 14.

On behalf of the applicant, David Young, Peter Todd and Billy Clark made the following comments in response:

- That a detailed assessment of vehicle emissions had been undertaken as part of the application in order to predict pollutant concentrations at relevant locations.
- That air quality assessments had not been undertaken in the Runnymede area due to the number of HGV movements being significantly under 25 per day.
- That if the application was approved then there would be significant reduction in traffic related pollution concentrations due to the reduction in HGV movements in the applicants current operation.
- That the applicant had committed to ensuring all HGVs in the company fleet meet the latest emission standards.
- That a detailed transport statement was submitted with the planning application which considered the access, highway safety and traffic impacts of the development which officers have raised no objections to.
- That the access roads were designed to typical industrial estate standards and were already used by HGVs. There was also no evidence of any existing highways safety issues.
- Vehicle access to the development would operate on a one-way system which would help to reduce conflict. A digital system would also be implemented to track and redirect vehicles, if necessary, during the day.
- That there were no highways related reasons to resist the application.
- That it had been proposed to build a structure on the site which would act to screen noise occurring within the structure and therefore reducing the level of noise.
- That the closest residential home was 125 metres away and that the level of noise received was significantly below the level of background noise in the area.
- It was highly unlikely to have any adverse impact on the local residential homes and businesses from noise.

The Local Member, Tim Oliver, was unable to attend at the beginning of this item however an audio recording of the Local Member's speech was played to the Committee which made the following comments:

- That he wished to object to the application and supported the many objections which had been recorded.
- That the conditions outlined in the report did not address the issues that the application raises.
- The proposed development was too large and too impactful on the other occupants and the nearby residential dwellings.
- That there would be unacceptable harm to the character and appearance of the area and a likely impact on the amenity of the local residential properties.
- That there would be an impact of traffic as the area was highly congested already and that a traffic study had been commissioned for the whole of the Brooklands area because of its significant negative impact on residents' travel and lengthy queues. This proposal would exacerbate this issue.
- That Surrey County Council were not currently in a position to adopt the draft Surrey Waste Local Plan and that it would not be considered in July 2020.
- That the Committee should refuse the application for change of use.

Key points raised during the discussion:

1. Katie Rayner, Senior Planning Officer, introduced the report and provided a brief summary. A supplementary agenda was published on 29 June 2020 which included an update sheet for the item. Additional representations are attached to these minutes as Annex 15, 16, 17 & 18 . Members noted that the application was for the Change of use to a waste transfer station and recycling facility (sui generis) for the receipt and treatment of mixed, dry, non-hazardous household, industrial and commercial and construction, demolition and excavation waste, including the demolition of the existing building at Unit 11 and the erection of a steel portal framed building, picking station, storage bays and boundary fencing. Members were provided with a presentation of photos and plans of the proposed development which were also included as part of the officer's report.
2. In regard to HGV access to the site, Members asked whether there was a turning circle within the site. Officers confirmed that there was a turning circle within the site.
3. Officers confirmed that junction modelling work had not taken place for this application due to the low impact of the proposal.
4. Members ask whether the proposal would be impacted by the emerging Local Waste Plan which had not yet been agreed. Officers confirmed the new Local Waste Plan was at an advanced stage of development and that the proposal did not conflict with either waste plan and that the emerging plan was still considered as a material consideration.
5. Members raised concern with the number of vehicle movements outlined in the report.
6. Officers confirmed that the hours of operation had been reduced by officers to 07:00 – 18:00, Monday to Friday and 07:00 – 13:00 on Saturdays and the additional hours of working were 18:00 – 20:30, Monday to Friday and 13:00 – 17:00 on Saturdays for the operation of the plant within the building with no HGV access.
7. The Leader of the Council and Local Member highlighted to Members that officers were in the process of commissioning a traffic study which would demonstrate the significant issues around congestion on the four main points into the area. Officers stated that, when divided across the day, the 200 HGV movements were very insignificant and not enough to conduct any transport modelling. Along with this the National Planning Policy Framework 2019 noted that these movements were not significant enough to refuse the application.
8. Cllr Muir proposed to move a motion for deferral of consideration of the application until the upcoming traffic study in the area was completed. The motion was seconded by Cllr Povey.
9. Officers highlighted to Members that the proposal would increase the traffic movement in the area by 0.98% and if approved 2% of the overall road traffic would be by HGVs movements.
10. A Member highlighted to the Committee that the application should be considered on the information available at the time and on its own merits.

11. The Leader of the Council confirmed to the Committee that the traffic study had been commissioned by the Elmbridge Local Committee to consider the impacts of the existing congested traffic moments and consider possible improvements. In terms of timescales the Leader of the Council stated that the traffic study was likely to take place by the end of the year however this could be impacted by the current pandemic. Officers stated that it would not be reasonable to defer an application on an unrestricted timescale and that the application should be considered on the merits of the proposal.
12. Officers highlighted to Members that the site was currently vacant and therefore another industrial use could be placed there and result in more unrestricted vehicle movements and without the need for planning permission.
13. Cllr Hawkins moved the recommendation for refusal, seconded by Saj Hussain, which received 2 votes for, 8 against and no abstentions. Therefore the motion was lost.
14. Cllr Muir confirmed that she would not move a motion to defer the application.

Resolved:

The Committee unanimously agreed to permit application EL/18/3802 subject to conditions from page 268 of the agenda papers.

9/20 SURREY COUNTY COUNCIL PROPOSAL RE20/00808/CON - WESTVALE PARK PRIMARY SCHOOL, OFF WEBBER STREET, WESTVALE PARK DEVELOPMENT, HORLEY, SURREY [Item 9]

Officers:

Dawn Horton-Baker, Principal Planning Officer
Charlie Cruise, Senior Transport Development Planning Officer
Nancy El-Shatoury, Principal Lawyer
Joss Butler, Committee Manager

Speakers:

Nicholas Wooding, local Resident, made representations in objection to the application. The following key points were made:

- That they had multiple concerns due to the proximity of the proposed building units and their property
- That they were concerned with the use of the private lane with parents dropping of pupils as there would be an impact on privacy and increased noise
- That the cottage located parallel to the proposed site was a listed building and may be damaged by vibrations from heavy machinery five metres away.
- That the proposed pedestrian access gate at the top of the road would encourage parents to use Malthouse Lane.
- That there was no reference to COVID-19 in the report as the proposed building would cause residents to struggle to work from home. There was also a risk of parents gathering around the school gates which would restrict social distancing in the area.

- That it was not clear who would maintain the pedestrian path and road.

Key points raised during the discussion:

1. Dawn Horton-Baker, Principal Planning Officer, introduced the report and provided a brief summary. Members noted that the application was for the Installation of temporary buildings comprising two double classroom units and a staff administration unit, a temporary pedestrian access gate, a temporary vehicular access gate, temporary fencing and temporary reinforced gravel surface. Members noted further details on the application which were outlined in the report.
2. Members asked for clarification on the main disadvantages to residents for the proposal. Officers stated that the residents were concerned that parents would use the private road to drop off pupils at the pedestrian access. Officers further stated that Surrey County Council did not have the power to prevent access down the private road however the council is promoting that the school has active management of pupils and staff to ensure the private road is not used for dropping off.
3. Members asked whether residents could use a gate to prevent cars using the private road. Officers confirmed that the road was a private road however it had public footpath rights therefore could not prevent pedestrians. In regards to placing a gate, officers said this would likely that only the road owner could take action against trespassers.
4. Officers confirmed that the school contractor had stated that they would monitor the use of the lane for the duration of the temporary period. Officers further stated that there was a condition for the permanent application to have a full travel plan. For the current proposal, the school would be providing a management man to look at managing the problems which have been identified by the residents. A council officer would monitor this and encourage compliance.
5. The Chairman stated that from his experience as a school governor it was important for the school to be immediately clear on any travel management plans. Officers highlighted that this was a temporary application and that the school would not have the ability to produce a full travel plan in the current timescales. Officers had been proactive to encourage the school to create a management plan where travel to the school was taking into consideration which officers believed to be a proportional action for the temporary application.

Resolved:

The Committee unanimously agreed to PERMIT application RE20/00808/CON for a temporary period until August 2021 subject to conditions from page 331 of the agenda and update sheet.

10/20 APPLICATION TO RECTIFY THE REGISTER OF COMMON LAND - LAND AT THE HALLAMS, LITTLEFORD LANE, BLACKHEATH, GUILDFORD [Item 10]

Officers:

Helen Gilbert, Commons Registration Officer
Judith Shephard, Lawyer
Joss Butler, Committee Manager

Speakers:

None.

Key points raised during the discussion:

1. Helen Gilbert, Commons Registration Officer, introduced the report and provided Members with a brief summary. Members noted that the Committee was asked to consider whether or not to remove the land outlined in the report subject of the application from the commons register. Further details on the application were noted and outlined in the officer's report.

Resolved:

The Committee unanimously agreed that:

- a. the Applicants be permitted to amend the application; and
- b. the application to deregister the land shown hatched blue on the amended application plan be accepted.

11/20 DATE OF NEXT MEETING [Item 11]

The date of the next meeting was noted at 20 August 2020.

Meeting closed at 17:21pm

Chairman

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SCC UKOG meeting - Sarah

DUNSFOLD is a beautiful village situated in the Surrey Hills Area of Great Landscape Value and closely linked with the nearby AONB. It's a rural environment with unspoilt amenities, just 1600 metres west of the proposed drill site. I have lived here for 27 years, it's a special place and I feel lucky call it home.

In the Officers report of the 623 representations sent in, 521 are against the UKOG proposal – that's a convincing 84%. Local parish councils and WBC also object.

In 2019 Surrey declared a Climate Emergency and now has a Climate Change Strategy, from which I address 3 relevant ambitions–

1. *Residents live in clean, safe and green communities*

Dunsfold is at present clean, safe and green BUT this will be lost if UKOG gets the green light. There will be significant negative impact on nearby footpaths, bridleway and the landscape –the drill site, access road, security lights and fencing – all a visible SCAR.

We have a real THREAT of pollution – noise, light, air, water, noxious gas

2. *Journeys across the county are easier, more predictable and safer.*

The access route proposed at Pratts Corner is causing serious concern, being as it is a 4-way junction on dangerous blind bend. The recently revised (BUT still unclear) UKOG Traffic Management Plan has not allayed fears on highway safety.

Delays are inevitable and smaller side roads will become rat runs, already over-burdened and in poor condition.

3. *Businesses in Surrey thrive.*

This application is for a 3 year 'small & temporary' exploratory licence. But the predictable, IMMEDIATE & largely irreversible impact is such that it will be at a huge cost to our local economy and lifestyle.

This proposal offers neither short nor longer term economic benefit to the local community.

In summary - Dunsfold is faced with

- losing a rare area of unspoilt, peaceful countryside & its amenities
- negative impact on wildlife, flora and fauna
- increased HGV traffic on local roads
- negative financial impact on local businesses and residential properties, especially those listed and in close proximity

The Covid19 pandemic is accelerating major shifts in public thinking & there is an evident appetite for change; the oil industry is being hammered by rapidly evolving green energy alternatives.

What is needed now is innovative thinking and leadership to achieve environmental goals, here in Surrey and nationally.

I ask you now, on the balance of what you will hear –

is such a speculative, insignificant but potentially damaging drilling operation justifiable or appropriate in 2020?

Give our communities here in SW Surrey the GREEN light
and give UKOG the RED light.

THANK YOU

High Loxley Road is a long meandering private lane, edged with hedgerows, fields and wild flowers.

It provides the tranquil approach that leads to High Billingham Farm... the home, where my family and I have invested our time, energy and savings in developing a **very** special wedding venue business which has gained a unique and outstanding reputation.

Our wonderful approach and idyllic location, with far reaching views towards Hascombe Hill in the AONB, are **key features** that set us apart from many others... and they create the very first impression of our venue.

There is no doubt that considerably widening High Loxley Road... enough to accommodate passing HGVs... the replacement of hedgerows with over 50 metres of security fencing and gates, traffic controls, signage and artificial lighting, **will** completely destroy the rural character and appearance of our approach.

It will be mayhem, particularly as many of our weddings take place on a Friday when the proposed site is fully operational.

The noise and odour from the drilling site itself, which sits between us and our views towards the AONB is less than **100 metres** from our boundary.

together with the 37 metre high oil rig, which is in direct line of sight **and** earshot of our home and wedding venue, our rural setting will be ruined, having an **immediate** and **devastating** impact on our business... our reputation... and our livelihood.

Our venue attracts couples from all over the country and we are licensed to hold up to 50 events a year with up to **8000** visiting guests.

We are already nearly fully booked for 2021 and now taking reservations for 2022.

I would estimate that we generate about £4m a year for the many local Surrey businesses and suppliers that all help to support our events:

caterers, local food producers, serving staff, florists, marquee companies, event planners & technicians, celebrants, photographers, hotels, BnBs, taxis, pubs and of course the local parish churches where ceremonies often take place bringing them essential income and outreach.

Understandably, concerns have **already** been raised by some couples anxious about the possible impact this development may have, with the request to include an additional cancellation policy should they decide not to proceed here as a consequence.

Venues as special as ours are very few and far between, and so the revenue that our business attracts to this part of Surrey will simply vanish.

Permitting this application will not only severely impact **our** business, but **many, many** others locally.

I would therefore urge you to **please** consider this when making your decision, and **refuse** this speculative application, because the adverse impacts clearly outweigh any possible benefit.

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ASHLEY HERMAN SUBMISSION TO SCC

When I met Brian Alexander, UKOG's PR Executive, he told me that they had chosen this site because it is "in the middle of nowhere."

Really?

The proposed site is located in the heart of a community which includes my farm and two others. All heritage listed buildings.

It also includes two Gypsy, Roma and Traveller communities, comprising 85 homes, housing 340 people.

The perimeter of UKOG's activities will be 230 metres from my house and 115 metres from the site of our cancer awareness festival and retreats.

The nearest Gypsy home, belonging to Simon Doherty, is only 290 metres from the site. Yet he and his GRT community have not been properly consulted nor afforded a voice in this process.

The effects of UKOG's activities on us are described as "insignificant" in the Officers' Report.

But I beg to differ.

Over 370 people will be living, working and bringing up their families, within 450 metres of an oil well.

Soon, we could all be exposed to the 24-hour noise, odour, flares, air, light and water pollution and the risk of sour gas.

For at least three years.

Our cancer awareness enterprise runs throughout the year.

Involving health professionals ranging from oncologists to palliative care experts.

It hosts cancer sufferers and their families: over 1000 people last year.

It cannot exist next to an oil well and will have to cease. With the loss of two full-time and 42 part-time jobs.

Our craft brewery employs ten local people. It has abandoned plans for a water borehole because of the risk of contamination, increasing its reliance on Mains Water, at an extra cost of £15,000 this year alone.

We have raised these concerns repeatedly. But they have been batted away as 'insignificant'. That's why Tom and I wrote to you directly.

You **can** refuse this application.

Yes, the NPPF says that that "great weight should be placed upon the **need** for more oil and gas". But this **need has gone** as is evidenced by climate science, affirmed by UK Statute, international law, the Vatican and by the markets. Even BP have pulled the plug on further exploration.

Happily, the NPPF stresses the **over-riding need for you to promote sustainable development, by weighing “National economic benefit” against “local harm “.**

-3-

The permanent local harm caused by this application far outweighs any dubious National good.

Happily, too, your Surrey Minerals Plan advisory MC 14, states development will be permitted “only where a need has been demonstrated”. There isn’t one. And “if there are significant adverse impacts of mineral development on communities and the environment, permission should be refused.

Having undertaken to create a greener Surrey, as people of integrity, I am asking you, please, to consider our situation, vote with your conscience and refuse this application.

ASHLEY HERMAN
29 JUNE 2020

THATCHED HOUSE FARM

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As a local resident living 900m east of the site, I wish to represent the huge number of local people directly threatened by the oil well's impact whose voices have been 'airbrushed out' both in scale and significance; Ashley referred to the community of some 370 people living within 500m of the site, mainly to the east, with hundreds more moving into Dunsfold Park, under construction a further 100m away. Alfold, Cranleigh and neighbouring parishes, totalling over 15,000 people, and Waverley Borough Council have all objected - the opposition to this is deafening, yet so far has fallen on deaf ears. Today, Councillors, you can change that! Your decision is on a matter of *balance*. The government has *not* told you 'you must have an oil well at this location'. You have to balance benefit against harm, and not simply dismiss local concerns as 'not significant'. Let's take Traffic Safety and sustainability: the section of A281 and B2130 approaching the site has an above-average accident rate, with recent fatalities – a fact not disputed by Officers – yet concerns are dismissed. Surely an inherently dangerous road is a dangerous road? This sole route into and out of the site, will be used by tankers, long low-loaders and Abnormal Loads. They will cross road centrelines on three blind bends and some are too wide to fit on the single track country lane approaching the site. Today's last minute Update shows this is a complex proposal and suggests a section 278 agreement. But you should have expected to see full details of this solution and a workable and safe traffic management scheme; you have not. There remains serious concern that the largest vehicles *will* ground on the acute profile at Pratt's Corner, and some vehicles *are* too wide for the lane. We all need the chance to correct errors that the Update contains. Officers told our Local Councillor that traffic control by a 'banksman' at the end of High Loxley Road would replace the previous traffic signal solution; there is no mention in the Update. This is a vital safety issue. Members, you cannot gamble on approving this application without full clarity that policy MC15 is satisfied. Secondly, the

local community hugely values its right to enjoyment and amenity of the AONB and AGLV countryside. Noise, light pollution, and odours cannot be lightly dismissed. Views of the 37m high rig from Hascombe Hill and by users of Bridleway 280 immediately adjacent, are said 'not have an unacceptable impact'. I have yet to find a single local individual that agrees. Thirdly, crucially, a key plank of NPPF is economic sustainability; you have heard from Tom and Ashley the real, quantifiable costs to their businesses. So, Councillors have you found any *quantifiable benefits* of this application? The answer is No, *because, Councillors, there are none* in this 3-year exploratory proposal! Under NPPF Clause 183, this risk is *not* 'acceptable use of the land'. You have an historic choice to make; to preserve the lives and livelihoods of our rural community, or to permit a speculative venture, risking lives on our roads, harming our environment and with zero benefit. The genie will be out of the bottle and history will be your judge.

Thank You.

536 words

I am a resident and give this objection in conjunction with Dr Richard Seaborne

The strategic benefits in relation to national energy security from this site would seem to be less than significant in comparison to the many disadvantages and harm.

The area has been previously drilled and the limits of the fields have been established. No new geological data¹ has been provided by the applicant.

I refer to policy MC12 of the Surrey Mineral Plan of 2011.

Planning applications for drilling boreholes will only be permitted where adverse impacts on the environment have been minimised. Well sites should be located such that there are no significant adverse impacts and only approved where the need has been established to confirm the nature, extent and potential means of recovery.

Whilst the primary objective for drilling is given as gas, Godley bridge (a few miles away) was abandoned as being uncommercial and encountered a significant presence of hydrogen sulphide – sour gas. Previous appraisal drilling in the Portland Formation demonstrated that the volumes will be neither economically or strategically significant.

The secondary target is oil.

There is a strategic issue of oil security. But here we are not talking about Wytch Farm in Dorset, achieving some 100,000 barrels at peak. We are talking about a Horse Hill or less which is hardly strategic or significant for the economy.

The applicant states that the key reason for drilling at Loxely as set out on Page 20 para 72 of the officers report is to test “the presence of an open and continuous natural network of hydrocarbon deposits capable of flowing to surface without stimulation.” and to indicate the opportunity for future commercial recovery across the wider Weald Basin.

The geological setting and reports from wells drilled previously do not support this – Alfold-1 drilled by Conoco in 1986 a well to the south east of the proposed location failed to prove the presence of meaningful hydrocarbons and any continuous network of hydrocarbon deposits. The failure of UKOG Broadford Bridge well to recover meaningful volumes of hydrocarbon demonstrated that whilst the potential micritic reservoir horizons in the Kimmeridge may be pervasive, the fracture systems are not.

Loxley-1 may well encounter hydrocarbons in the Kimmeridge and there may well be natural fractures that will allow some hydrocarbons to be recovered to surface. What this will not do is prove or even support the presence of an open and continuous natural network of hydrocarbon deposits capable of flowing to surface without stimulation.

So I would argue that this application is contrary to MC12, does not justify further drilling and the suggestion of an extensive open and continuous natural network of hydrocarbon deposits without stimulation does not fit with the facts.

The site has not been well chosen, the environment and social impacts are high and I would ask you to reject this application.

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Comments on WA/2019/0796, Loxley Well Site - Land South of Dunsfold Road and East of High Loxley Road, Dunsfold, Surrey

From Cllr Jonathan Essex and Kirsty Clough, Godalming resident, June 2020

While a thorough analysis of the application, the Officer's Report contains some crucial factual errors, raises some very important issues in a misleading and sometimes incorrect way, and misquotes the Environment Agency. It is important that decision makers are aware of the full information, particularly where there is policy, legislation, science and data that are not being properly presented.

In light of these failings, and the substantive issues about the environmental impacts of the proposal, the application should be rejected.

Comments on application – these are under three headings:

- 1. Flawed assessment of the need for oil and gas**
- 2. Risks: unconventional extraction and financial bond**
- 3. Conditions regarding risk, resident amenity and local environment**

These points are set out in more detail below.

1. Flawed assessment of the need for oil and gas

i. The reducing need for oil and gas

The Officer's Report acknowledges the weight of objections to this proposal, including on the topics of reducing need for oil and gas in the transition to a low carbon economy and on climate change grounds, but disregards them. The National Planning Policy Framework (chapter on sustainable development) requires a balance to be found between competing interests, including the protection of the environment¹. The Officer's Report does not reflect this balance.

The summary (p9 – 3rd paragraph) suggests that great weight is given to the benefits of mineral extraction, including to the economy. Similar weight is not given to the climate impacts of oil and gas developments, although the UK carbon budgets should constrain developments that will lead to significant upstream or downstream greenhouse gas emissions in order that we are able to deliver net zero by 2050 at the latest. The report notes the need to “manage reliance” on [fossil fuels]. In the light of the UK's new net zero climate change target, one of the best ways to do this is to reduce dependence on them by reducing demand and by greater diversification into renewable energy sources.

Assessing 'need' for oil and gas must take into account both a) the timeframe over which need is considered and b) the constraints on carbon emissions during that timeframe to meet that demand arising from the UK's legislated commitment to be net zero carbon by 2050.

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

The Officer's Report (paragraph 167) relies on data from the Government's 2012 Energy Security report which forecast that the UK would be net importers of 43% of UK oil demand and 53% of gas demand in 2020. The UK Government calculates the import dependency by calculating the difference between UK production and UK demand. Updated projections from the Oil and Gas Authority which were published in February 2020 show revised oil and gas production figures based on a slowing rate of decline in UK reserves². Extrapolating from the figures given, these new estimates show a forecast import dependency (using the Government's methodology) of 26% for oil in 2020 and 48% for gas. Both figures are significantly below the 2012 forecasts. Given the current impact on demand for fossil fuels due to the ongoing Covid-19 pandemic, even this 2020 forecast is likely to be an over-estimate of our true import dependency this year.

The current global crisis has reduced demand dramatically, leading to a fall in prices so that only the most cost-efficient operations may survive. These are likely to be large scale operations on a solid financial footing. The result is that there is currently an oversupply of fossil fuels and an upsurge in interest in alternatives which will provide clean, secure long-term sources of renewable energy, such as wind, wave and solar.

The reference to the Government's 2012 Energy Security report also only considers the levels of oil and gas imports in 2020, whereas the timeframe for which 'need' is surely best considered is during any commercial production phase. Given that the current application is for exploration and appraisal over 3 years, should the site generate any commercially viable oil and/or gas and an application for production be submitted, any production well(s) would likely not come onstream before the mid to late 2020s.

Although the current planning application states that the primary target is for the exploration of gas from the Portland Sandstone Formation and that their secondary target is oil from the Kimmeridge, it is clear that UK Oil & Gas (UKOG) is primarily interested in exploiting unconventional 'tight' oil plays³. A report undertaken for UKOG by Ernst and Young in 2016 suggested that wells of this type would have a production life of 43 years⁴. The current Oil and Gas Authority projections to 2035

² <https://www.ogauthority.co.uk/data-centre/data-downloads-and-publications/production-projections/>

³ As the Officer's Report notes in paragraph 72 - *"The applicant states that the near identical reservoir geology between the Loxley Well Site and the exploration and appraisal sites at Broadford Bridge, West Sussex and Horse Hill, Surrey indicates that the Kimmeridge and Portland reserves may be linked. Therefore, the most important technical goal of the exploration and appraisal work at Loxley is the confirmation of the Kimmeridge/Portland 'Geological Concept', namely the presence of an open and continuous natural network of hydrocarbon deposits capable of flowing to surface without stimulation. The need to 'confirm the nature and extent' of this regional system will be key to the future commercial recovery of deposits across the wider Weald Basin formation"*.

UKOG's Annual Report for the year ended 30 September 2016 said:

*"UK Oil & Gas Investments PLC ("Group", "Company" or "UKOG") is an oil and gas investment company which specialises in finding and producing oil from previously unrecognised naturally fractured rocks in the Weald Basin of southern England. **Our prime focus is upon a new type of oil deposit within Kimmeridge Limestone rocks which we are pushing towards commercial production.**"* - [https://www.ukogplc.com/ul/UKOG%20AR%20-%20Final%20\(CLEAN\)%202017-02-27.pdf](https://www.ukogplc.com/ul/UKOG%20AR%20-%20Final%20(CLEAN)%202017-02-27.pdf)

⁴ 'Kimmeridge Limestone Oil: The UK opportunity'

<https://www.ukogplc.com/ul/Kimmeridge%20Limestone%20Oil%20->

show that the reduction in demand for oil will not keep pace with the projected decline in UK oil production and hence import dependency will likely increase over this timeframe. However, crucially, beyond 2035 and looking out to 2050, assuming the UK delivers on its commitment to be net zero carbon as enshrined in the Climate Change Act, oil demand will radically fall. Indeed, the Committee on Climate Change's net-zero scenarios result in oil consumption falling to 12 million tonnes of oil equivalent (Mtoe) in 2050 (it was 76Mtoe in 2019)⁵. UK oil production is projected to continue its decline such that by 2050 its output is around 11Mtoe. Over this period, therefore, import dependency of oil could fall to just 8%⁶.

Similarly the National Grid modelling of Future Energy Scenarios Zero Carbon (July 2019⁷) shows a dramatic reduction in oil and gas demand and no increase in import dependency should the UK transition to zero carbon by 2050, as is now legislated.

Put simply, an argument for this application on the basis of 'need' is not clear cut and must take into account both the timeframe over which need is considered and the likely constraints on carbon emissions during that timeframe which would impact both demand for energy and the carbon intensity of the energy supplied to meet that demand.

In addition, given its current contribution of around only 2% to UK production, if onshore oil were **to make any meaningful contribution to even the residual need for oil in 2050 under a net zero carbon scenario, it would require a massive ramping up of production across southern Surrey, Sussex and the Isle of Wight and the industrialization of the countryside. This would be unacceptable.**

ii. The carbon footprint of UK versus imported oil

Another issue raised in a summary of supporters' statements, and by the applicant, is that oil produced in the UK has a lower carbon footprint than imported oil (para 201) when transportation is taken into account. It is unclear where the evidence is for this claim, as there is no attempt to assess the carbon footprint of developing new onshore oil extraction sites and the HGV emissions associated with them long term. Norway is the single largest exporter of oil to the UK and that oil is piped directly to Teesside from a long-established oil field in the North Sea. There are similar established supply lines for gas. Further research would be needed to establish whether industrialising the South of England and using HGVs for transportation, even if the end destination of the hydrocarbons could be guaranteed to be in the UK (see below), has a lower carbon footprint than, say, North Sea oil delivered by pipeline.

This is also relevant to paragraph 186 of the Officer's Report, which implies some certainty that indigenous oil and gas will actually be used within the UK. There is no such certainty. The UK is both an importer and an exporter of oil⁸. There is no guarantee that oil from Dunsfold would be confined to the domestic market as oil is bought and sold internationally. Planning officers continue to repeat this myth of local

[%20The%20UK%20opportunity%20-%20Final%20Approved%20-%2015%20April%202016.pdf](#)

⁵ Converted from Terawatt-hour figures given in the CCC's Net Zero report.

⁶ Authors own calculations based on extrapolation of figures from the CCC's net zero report.

⁷ <http://fes.nationalgrid.com/media/1409/fes-2019.pdf>

⁸ See page 21:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875552/Oil_and_Oil_Products_Q4_2019.pdf

oil and gas being produced for use in the UK market in support of various planning applications and they should ask for guarantees from developers that they intend it to be carried through into practice. At present it remains a false claim and the more likely outcome is that, in the absence of a global cap on greenhouse gas emissions, any UK-produced oil and gas is added to the volume of hydrocarbons in the international market rather than substituting for it, resulting in an increase in global emissions.

iii. Climate Change policies

The report refers to the application for judicial review (CO Ref: CO/4441/2019) of Surrey County Council's decision on 27 September 2019 to grant planning permission for the retention and extension of an existing well site at Horse Hill and says it may be still be appealed under the Seismicity section. **This is incorrect.** An appeal against the failure to grant permission for a Judicial Review is pending, but for **climate change** grounds alone.

Furthermore, both the suggestion that the quashing of paragraph 209(a) of the NPPF is not considered to change Government planning policy in support of extraction of hydrocarbons and the overall order and tone of this report create a bias that places 'need' above 'climate change', the opposite of what is required by government.

The Officer's Report does not address the direct and indirect climate impacts of the development. It should. Surrey County Council has now approved its Surrey Climate Change Strategy, which sets out an intention to keep Surrey within a budget of 56 MtCO₂e.⁹

The Officer's Report misrepresents the status of the Surrey Climate Change Strategy and is selective in what it draws from it. Contrary to the Officer's Report, the Cabinet did not simply endorse the report – they commissioned and approved it. And while the Officer's Report draws more on the requirements to reduce organisational emissions by Surrey County Council than on its role, as a planning authority, to reduce the wider emissions across the county, the following commitments from the Strategy are more relevant to this application:

- "To ask the government to make explicit that planning authorities have the right to reject planning applications where there are identifiable and material climate change impacts (p18); and
 - "To expand renewable energy generation capacity across Surrey (p29)*"
- *There is no reference to expanding oil and gas production.*

2. Risks: unconventional extraction and financial bond

- As well as the conventional Portland Sandstone this proposal also targets an unconventional reservoir in the Kimmeridge Limestone¹⁰ potentially using unconventional techniques**

⁹ See page 10 of strategy, on page 58 of cabinet report - <https://mycouncil.surreycc.gov.uk/documents/g7259/Public%20reports%20pack%20Tuesday%2028-Apr-2020%2014.00%20Cabinet.pdf?T=10>.

¹⁰ http://www.searchanddiscovery.com/pdfz/documents/2018/11100palci/ndx_palci.pdf.html

The Officer's Report states that the Kimmeridge "limestone" reservoir is conventional. It is not. The application targets the conventional Portland sandstone and the unconventional Kimmeridge Clay Formation, the latter being a thick deposit of shale rock. **Shale is not a conventional formation, and often requires unconventional methods to release hydrocarbons at commercial levels because of its low permeability.** There is a longer explanation here:

<https://brockhamoilwatch.org/kimmeridge-clay-formation-kcf/>, which includes the comparison made by the Oil and Gas Authority of the Weald resources to the Bakken in North America, an area widely targeted for shale gas using hydraulic fracturing ("fracking") technology.

The application, as noted in the Officer's Report paragraph 18, makes clear that this development does not propose the use of high-volume fracturing to stimulate the well(s). However, it gives very little information on what drilling methods will be used. For example paragraph 657 notes that "*Side-track well L-1z will allow alternate completion methodology, new completion fluids and the possible use of small-bore radial drilling to be deployed in the search for higher sustainable recovery rates*" but there is no information about what these methods would actually entail, what chemicals will be used in the completion fluids, etc. The report goes on to say (in paragraphs 660 and 661) that "*the CPA is primarily concerned with whether or not the development and use of the land on the surface is acceptable in planning terms and whether any adverse impacts can be suitably mitigated. ...The drilling methodology to be used relates to sub-surface operations and any concerns about this aspect of the development is not considered to be a matter for the CPA to resolve, control or monitor*". This is not true of, for example, certain types of well stimulation methods which use acid which are likely to have above ground impacts. Indeed, concerns have been raised that such well stimulation methods may be used given the unconventional nature of part of the target geology.

How will the MPA know if adverse impacts can be suitably mitigated if it is not aware of what these adverse impacts are, given the absence of any detail on the drilling methods that will be used? Alongside hydraulic fracturing, for example, why has acid stimulation not also been explicitly ruled out by the applicant?

The Officer's Report, in citing the Environment Agency's factsheet on acidization from January 2018¹¹, erroneously states (paragraph 666) that "The factsheet confirms that in relation to the different types of 'acidisation', the EA does not consider an acid wash, matrix acidisation or fracture acidisation / acid fracturing to be a form of well stimulation". The factsheet clearly states "The Environment Agency **does consider matrix acidisation to be a form of stimulation." And "The Environment Agency **does** consider fracture acidisation to be a form of stimulation."**

The application and Officer's Report also refer to the use of "radial drilling" using small bore technology. This is an unconventional technique used all over the world to improve flow rates and access sub-commercial fossil fuels¹².

¹¹ https://consult.environment-agency.gov.uk/onshore-oil-and-gas/onshore-oil-and-gas-regulation-information-page/supporting_documents/Acidisation%20FAQs%20January%202018.pdf

¹² <http://www.ijstr.org/final-print/nov2014/Radial-Drilling-Technique-For-Improving-Recovery-From-Existing-Oil-Fields.pdf>

¹² <https://www.drillingcontractor.org/low-cost-radial-jet-drilling-helps-revitalize-40-year-old-oilfield-23377>

Approving this application would enable a potentially long-term unconventional operation which will be largely self-regulated. The Environment Agency, the Health and Safety Executive and the Oil and Gas Authority rely on a system of self-regulation as the Officer's Report makes clear (e.g. paragraphs 129 and 130).

ii. **Financial Bond**

The point about the need for a bond has been well made to the MPA by others and their concerns must be reflected as part of the decision-making process. There are significant risks involved and these cannot be mitigated without a financial bond to underwrite them. We support the recent letter with a number of signatories submitted to Councillor Hall on June 13th 2020.

3. Conditions Regarding Risk, Resident Amenity and the Local Environment

If the Committee is minded to approve the application, in order to safeguard the local environment and residents' quality of life we request the addition of conditions covering the following:

i. **Water Environment**

Condition 22 does not require calculation and approval of the capacity for the containment ditches. What is the storage capacity of the proposed containment ditch and is it sufficient? Is some kind of interceptor or holding tank required, as was the case in Horse Hill (condition no. 24: surface water management).

ii. **Drilling Methodology**

This application is for both the exploration and appraisal stages for the Loxley-1 and Loxley-1z boreholes. However, as discussed above, no details of the drilling methodology have been given either in the sections titled 'exploration and appraisal methodology' or 'drilling methodology' in the Officer's Report. The application should be refused based on this lack of clarity, or at least conditions should be set to ensure this information must be disclosed and approved prior to both the exploration and appraisal permission stages. The Officer's Report is unclear as to how effective regulation (and monitoring) will occur as to the addition of chemicals to the water put down the borehole. It provides a commentary on the Environment Agency factsheet on acidisation¹³ but provides no details as to how much of what acid is proposed to be used, or how. In the absence of this information, the MPA recommends giving blanket permission, ignoring the potential for wider impacts. In addition it appears to suggest that the Environment Agency and Health and Safety Executive could investigate potential migration of acid through geological formations – without any clarity as to whether this is possible, let alone feasible. This is unacceptable.

Dunsfold Parish Council and others made this point in their submissions but the Officer's Report appears to have ignored these important objections.

¹³ https://consult.environment-agency.gov.uk/onshore-oil-and-gas/onshore-oil-and-gas-regulation-information-page/supporting_documents/Acidisation%20FAQs%20January%202018.pdf

iii. Hours of operation (and associated hours of HGV movements)

The hours of operation proposed – 7am to 7pm – are too long. This is longer than the permitted hours at Horse Hill (8am – 6.30pm Monday-Friday) and is unacceptable noting the nearest homes are 330 metres away and the permitted Dunsfold Village 850 metres away.

Paragraph 70 suggests that these hours could be extended on an exceptional basis – this appears to be reflected in the list of exceptions in condition 6.

Proposed addition: The MPA should to be notified in advance of a request for exceptional hours of operation and the reasons for this.

iv. Dust, Air Quality (and Odour)

No requirements for **dust mitigation and/or management, air quality management or odour assessment** appear to be included in conditions (as requested by the Environmental Health consultee, paragraph 75, and the latter two by Dunsfold and Bramley Parish Councils). Odour could be a significant concern at this site due to the presence of sour gas. Odours at Horse Hill have given rise to public anxiety and there have been alleged health impacts to humans and animals. This is a serious matter which needs to be properly regulated.

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KEEP Kirdford and Wisborough 'Green'

**KKWG submission to
Waverley Borough Council/Surrey County Council concerning
Planning Application: Reference SCC Ref 2019/0072
Application number: WA/2019/0796 made by KOGL/UKOG
Objection: Part 3 to comment on the Planning Officer report**

Loxley Well Site - Land South of Dunsfold Road and East of High Loxley Road, Dunsfold,
Surrey

Consultation on a county matter; the Construction, Operation and Decommissioning of a well site for the Exploration and Appraisal of hydrocarbon minerals from one Exploratory Borehole (Loxley-1) and one side-track borehole (Loxley – 1z) for a TEMPORARY THREE YEAR CONSENT for the construction, operation, decommissioning, retention or restoration of a well site to include plant and equipment, the construction of a new access track, a new highway junction within High Loxley Road, highway improvements at the junction of High Loxley road and Dunsfold road and the erection of a boundary fence and entrance gates followed by the drilling, appraisal, initial well testing and extended well testing of hydrocarbon minerals from one exploratory bore-hole (Loxley-1) and one sidetrack borehole (Loxley-1z).

Consultation closing date: July 8th, 2019,
Decision meeting: Virtual SCC June 29th, 2020

Ward:	Chiddingfold and Dunsfold
Parish:	Dunsfold
Application Type:	Consultation
Case Officer:	Stuart Corbey

Dedicated to the late Professor Stephen Hawking
'We Are Close to Tipping Point Where Global Warming Becomes Irreversible'

KEEP Kirdford and Wisborough 'Green'

*“It falls on every one of us to make a stand
It may sound frightening, but the scientific evidence is that if we have not taken dramatic
action within the next decade, we could face irreversible damage to the natural world and
the collapse of our societies.”*

Sir David Attenborough

Climate change

1. Following the impact of the Corona Virus pandemic, the politicians have “followed the science” and have had both the Chief Medical Officer and Environment Scientist alongside them.
2. What are the scientists saying? The world’s leading climate scientists have warned there is only 10 years for global warming to be kept to a maximum of 1.5C, beyond which even half a degree will significantly worsen the risks of drought, floods, extreme heat and poverty for hundreds of millions of people.
3. The authors of the landmark report by the UN Intergovernmental Panel on Climate Change (IPCC) say urgent and unprecedented changes are needed to reach the target, which they say is affordable and feasible although it lies at the most ambitious end of the Paris agreement pledge to keep temperatures between 1.5C and 2C.

Chief scientific advisors

4. Prof. Sir David King said he’s been scared by the number of extreme events related to climate change, and he called for the UK to advance its climate targets by 10 years.
5. In his role as scientific advisor to the UK government King was outspoken on the subject saying *“I see climate change as the greatest challenge facing Britain and the world in the 21st century”* and *“climate change is the most severe problem we are facing today – more serious even than the threat of terrorism”*.
6. In 2000, Sir Bob Watson stated: *The overwhelming majority of scientific experts, whilst recognising that scientific uncertainties exist, nonetheless believe that human-induced climate change is inevitable.*

KEEP Kirdford and Wisborough 'Green'

Climate Change scientists

7. Prof. Kevin Anderson, Universities of Manchester and Uppsala, Sweden: Actions on Climate change and the reduction of emissions are *incompatible* with Onshore Oil & Gas developments.
8. Prof. Corinne Le Quere, “*Despite the critical importance of CO₂ emissions for understanding global climate change, systems are not in place to monitor global emissions in real time. University of East Anglia*”, nor, for that matter is methane being measured which is a more dangerous gas to climate change than carbon dioxide.

Independent Climate Change Committee, Chris Stark, Chair

Independent advice to government on building a low-carbon economy and preparing for climate change

9. 6 resilience principles concerning Climate Change and building back after the C-Virus have been sent in a letter to the Prime Minister by the CCC. These are:
 - Use climate investments to **support economic recovery and jobs**. The CCC has previously identified a detailed set of investments to reduce emissions and manage the social, environmental and economic impacts of climate change. Many are labour-intensive, spread across the UK and ready to roll out as part of a targeted and timely stimulus package.
 - Lead a shift towards **positive, long-term behaviours**. The Government can lead the way to new social norms that benefit wellbeing, improve productivity and reduce emissions. This includes actions to support home-working, remote medical consultations and improve safety for cyclists.
 - **Tackle the wider ‘resilience deficit’ on climate change**. Strong policies are needed to reduce the UK’s vulnerability to the destructive risks of climate change and to avoid a disorderly transition to Net Zero. They must be implemented alongside the response to COVID-19 and will bring benefits to health, well-being and national security.
 - **Embed fairness** as a core principle. The benefits of acting on climate change must be shared widely, and the costs must not burden those who are least able to pay, or whose livelihoods are most at risk as the economy changes. Lost or threatened jobs of today should be replaced by those created by the new, resilient economy.

KEEP Kirdford and Wisborough 'Green'

- Ensure the recovery **does not lock-in greenhouse gas emissions or increased risk**. As it kick-starts the economy, the Government should avoid locking-in higher emissions or increased vulnerability to climate change in the longer-term. Support for carbon-intensive sectors should be contingent on them taking real and lasting action on climate change, and all new investments need to be resilient to future climate risks.
- Strengthen incentives to **reduce emissions** when considering tax changes. Revenue could be raised by setting or raising carbon prices for sectors of the economy which do not bear the full costs of emitting greenhouse gases. Low global oil prices provide an opportunity to increase carbon taxes without hurting consumers.

Criteria for decision making:

6 “stress tests” were discussed by the All Party Parliamentary Group, Oil and Gas in Parliament, APPG on which a decision on Onshore Oil&Gas development should logically be based drawn up by Professors Peter Strachan and Alex Russell, Heriot Watt University

- **social licence or public support** – very low, Public Tracker Results of the Wave 33 survey for the Department of Business, Energy and Industrial Strategy (BEIS) May 2020, Opposition to fracking has reached a record high of **45%**, according to a quarterly government survey of public attitudes. Support for fracking fell to a new record low of 8%. Just **1%** of those surveyed strongly supported fracking.

- **economic benefits** – none and less in the current situation as the price of oil has fallen and currently UKOG shares are valued at less than 1p. In the US, fracking is proving to be a boom and bust industry. At a recent Oil and Gas UK Business Breakfast, Martin Gilbert the Chief Executive of Aberdeen Asset Management also said that fracking is a debt-laden industry.

We can expect the same to happen here if we allow fracking. Last month's KPMG *'Economic Impact Assessment and Scenario Development of Unconventional Oil and Gas'* report, written for the Scottish Government, revealed: *"If oil and gas prices were to remain at historically low levels, it would be unlikely that Unconventional Oil and Gas resources could be developed economically."*

- **indirect economic effects** – none and it damages other industries such as tourism, the agricultural, food and drink sectors, and even the banking sector.

KEEP Kirdford and Wisborough 'Green'

- **public health and environmental impacts**, it is too early to report on these in the UK but US Compendium 6th edition drawn up by Concerned Health Professionals contain over 1500 research papers showing the harm done. For the sake of brevity the results are:

84% of the literature on health revealed public health hazards, elevated risks, or health impacts;

69% of the literature indicated positive associations or actual evidence of water contamination; and,

87% found elevated air pollutants and atmospheric concentrations of pollutants.

- **climate impact** – clear and irrefutable from gas escaping and burning of the fuels – oil or gas.

- **energy security** – DBEIS report on *The Clean Growth Strategy Leading the way to a low carbon future*, April 2018 contains no reference to Onshore Oil & Gas ie they don't contribute to it

Profs Peter Strachan and Alex Russell

Regulator – Environment Agency

10. *“So, we know the problem. We also know the basic solution. We need to mitigate the damage from climate change, by reducing or stopping the human activities which are causing it. We can do that in particular by **cutting our emissions of greenhouse gases**”.*

Sir James Bevan, CEO, Environment Agency
October 24th, 2019

Principle of Sustainable Development, NPPF

11. Due to the location of the application site, in the countryside, and its inadequate accessibility to services and facilities, the proposal is *not* considered to constitute sustainable development, nor would the proposal contribute to the achievement of sustainable development which lies at the heart of the National Planning Policy Framework, NPPF, 2019.

In view of the evidence and the declarations of the Climate Emergency internationally, nationally and locally, Sussex County Council Regulatory and Planning Committee should turn down this application

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From: mwcd@surreycc.gov.uk
Sent: 23 June 2020 10:07
To: MWCD Environment/ENV/SCC
Subject: New comments for application SCC Ref 2019/0072

New comments have been received for application SCC Ref 2019/0072 from Mrs Kathy Smyth.

Comments:

Please register this as an objection to Paragraph 237 of the SCC Officer report issued on 19 June 2020.

Paragraph 237 of the Officer's Report states as follows:- "Officers consider that although the development would last longer than 18 months, a Temporary Traffic Regulation Order (TTRO) would be possible in this case. Section 15(2) of the Road Traffic Regulation Act 1984 (RTRA) permits that the time- limit of eighteen months shall not apply if the authority making it are satisfied, and it is stated in the Order that they are satisfied, that the execution of the works in question will take longer; but in any such case the authority shall revoke the order as soon as the works are completed. The CHA has pointed out that, in any event, an alternative option is available. This would be to reduce the speed limit using a permanent TRO, which is then revoked once the 3 years of operations on the site have elapsed."

My objections to this statement are that i.Section 15(2) of the Road Traffic Regulation Act Section is not the appropriate section for these particular works because Section 14 refers to works 'on or near the highway' and the works at the drill site are some 900 metres away and that is not 'on or near'.

ii.An even more fundamental objection however is that Section 3(3) of the Road Traffic Regulation Act 1984 states that "Provision for regulating the speed of vehicles on roads shall not be made by a traffic regulation order" so SCC does not have the necessary powers under s14 to introduce a temporary speed limit (let alone extend it). Consequently SCC will need to rely on Section 88 of the same Act which actually and specifically relates to temporary speed limits or introduce a permanent speed limit.

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Rosemary Cottrell

From: Karen Lankester [REDACTED]
Sent: 17 June 2020 12:36
To: MWCD Environment/ENV/SCC
Subject: Re: Comments acknowledgement

Dear sirs

Further to delayed planning meeting comments upto 18th June, please accept my additional facts as presented by IOW in consideration of traffic management difficulties. In addition to being a rural area of AONB, the potential hazards posed to local schools (jigsaw at Dunsfold Park), & existing traffic management issues for Cranleigh, together with start of Dunsfold new town, make this a very poor application. Taken together with the council’s priority for healthier environment & reduce car journeys (walking /cycling/horse riding) would be impacted As well as existing low carbon environmentally friendly businesses. Instead the council should look to green energy sources, including solar on public & new builds

Kind regards, Karen Lankester, GU71JR

<https://drillordrop.com/2020/06/10/highways-officials-oppose-ukogs-isle-of-wight-drilling-plans-over-safety-concerns/>

[Sent from Yahoo Mail for iPhone](#)

On Sunday, July 7, 2019, 8:05 pm, mwcd@surreycc.gov.uk <mwcd@surreycc.gov.uk> wrote:

Dear Ms karen lankester,
Thank you for your comments for application SCC Ref 2019/0072:

"The number of HGV movements is unacceptable given the narrow roads and enviromental sensitivity & already compacted traffic when school buses cause delay & passing problems. There are deer & other wildlife who would be very disturbed & thre would be development creep. Finally UKOG is a dubious company with a poor record of accuracy in statements about prospects and safety."

Your comments have been logged against this application.

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* * * * *

From: [David Maxwell](#)
To: [MWCD Environment/ENV/SCC](#)
Subject: FW: From Rt Hon Jeremy Hunt MP - UKOG Application, Dunsfold
Date: 25 June 2020 09:35:46
Importance: High

From: HUNT, Jeremy [REDACTED] [@parliament.uk](#)
Sent: 24 June 2020 16:03
To: David Maxwell [REDACTED] [@surreycc.gov.uk](#)>
Subject: From Rt Hon Jeremy Hunt MP - UKOG Application, Dunsfold
Importance: High

Dear David

It has been brought to my notice that the approaching Planning Committee meeting to decide the application by UKOG to drill at Loxley is causing serious concerns to many of my constituents and to residents in adjoining areas.

I understand that there have been some significant late changes to UKOG's traffic proposals, most notably their decision in March this year to abandon the second access application and revert to the original route via Pratts Corner on B2130. For obvious reasons, while UKOG was pursuing the second access residents concentrated on this route, highlighting its many issues and problems.

However, since March people have re-focused their attention on the Pratts Corner Traffic Management Scheme (TMS) which was then examined closely and found to be impractical, a conclusion with which I gather the County Highways Officer (CHO) dealing with this application now accepts. This has resulted in the scrapping of the temporary 4-way traffic light proposal, but to date there is no or little information available publicly as to what will replace this. This is a matter of significant concern to many of my constituents but most particularly to the Gordon family at High Billingshurst Farm due to the direct negative impact any traffic management scheme will have on their existing and successful wedding venue business.

My constituents have been assisted by the input of a senior retired Highway Engineer, Mr Chris Britton, who lives on Stovolds Hill and is an Alfold Parish Councillor. He was concerned at the prospect of ALLV's grounding as they attempt to turn into High Loxley Road, an issue which has apparently been overlooked by the CHO. Mr Gordon has now commissioned and paid for a survey and expert analysis which has confirmed that ALLVs will in all probability ground at this junction. In addition it has now also become apparent, thanks to Mr Britton's investigations confirmed by the survey paid for by Mr Gordon, that the applicant's vehicles are actually wider than some sections of the metalled carriageway on High Loxley Road.

It is felt very strongly by a number of my constituents that the County Highways should have highlighted these serious failings in the TMS at a much earlier stage and that the physical issues with High Loxley Road should have been identified by County Highways rather than members of the public. It is clear there will have to be significant revisions to UKOG's Traffic Scheme but I understand that details of the TMS will not be made available before the meeting. I believe Officers have advised that it is normal for such details to be worked out as part of any TMS after consent has been granted. However, given the dangers of the highway network at Pratts Corner

I fully support calls by residents for the revised TMS to be published before the Committee hears this application, allowing them time to both examine and comment on it.

There is also another matter, relating to air quality, that needs to be addressed. I have been advised that this will not be monitored at the drill site and this is regarded by SCC as a matter for the Environment Agency. A comparison is being made with an application for anaerobic digestion being heard by the same committee on the same day which is also a matter involving the Environment Agency but where there are draft planning conditions dealing with air quality. Given the known presence of Hydrogen Sulphide at the nearby Godley Bridge drill site my constituents do not understand why no conditions dealing with odour and air quality are proposed by Surrey at the UKOG site when they are regarded as appropriate at an AD site. I understand that the Environmental Health officer from Waverley Borough Council has also raised this issue and suggested that it should be conditioned.

As a more general observation, a number of my constituents tell me they feel there has been a clear failure on the part of SCC Planning Officers to take their concerns about this application seriously. Overall it is felt there has been a failure by officers to balance the interests of the public with that of the developers.

I would be grateful if these serious and significant issues are responded to as swiftly as possible in order to assure my constituents that due process is being adhered to by SCC with regard to this application.

Best wishes

Jeremy

Rt Hon Jeremy Hunt MP
Member of Parliament for South West Surrey

Tel: [REDACTED]
www.jeremyhunt.org

I will treat as confidential all personal information you give to me or my staff. We may need to pass this on to others in order to help you. We undertake to handle the information you give to us in accordance with General Data Protection Regulation and the Data Protection Act. In any case, we will not use your data in a way that goes beyond your reasonable expectations. My Privacy Policy contains information about how and why we process personal data and your rights in relation to your personal data. It can be viewed on the following link: <https://www.jeremyhunt.org/privacy>. If you have any queries regarding the processing of your personal data by the office, please contact me by email at [REDACTED]@parliament.uk, or by letter at 2 Royal Parade, Tilford Road, Hindhead, GU26 6TD

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From: [David Maxwell](#)
To: [MWCD Environment/ENV/SCC](#)
Cc: [Tim Hall](#); [Jeremy Hunt](#); [Tim Oliver](#); [Katie Stewart](#); [Joanna Killian](#); [COLVIN, Hannah](#)
Subject: FW: UKOG APPLICATION SCC 2019/0072
Date: 23 June 2020 14:10:36

From: tom [REDACTED]
Sent: 23 June 2020 11:34
To: David Maxwell [REDACTED] [@surreycc.gov.uk](mailto:[REDACTED]@surreycc.gov.uk)>
Cc: Tim Hall [REDACTED] [@surreycc.gov.uk](mailto:[REDACTED]@surreycc.gov.uk)>; Jeremy Hunt [REDACTED] >;
Tim Oliver [REDACTED] [@surreycc.gov.uk](mailto:[REDACTED]@surreycc.gov.uk)>; Katie Stewart [REDACTED] [@surreycc.gov.uk](mailto:[REDACTED]@surreycc.gov.uk)>;
Joanna Killian [REDACTED] [@surreycc.gov.uk](mailto:[REDACTED]@surreycc.gov.uk)>; COLVIN, Hannah [REDACTED] [@parliament.uk](mailto:[REDACTED]@parliament.uk)>
Subject: RE: UKOG APPLICATION SCC 2019/0072

Dear David,

It is simply not acceptable that this application is being bulldozed through without the necessary details of the transport management scheme being provided so that the impact to my business can be properly assessed and any mitigating conditions agreed by the Committee prior to any determination.

I would really appreciate a response from you regarding this as soon as possible.

Kind regards,

Tom

Tom & Sally-Anne Gordon
High Billingham Farm
High Loxley Road
Dunsfold
Surrey
GU8 4BW

T: [REDACTED]
[REDACTED]

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Mr. David Maxwell
Surrey County Council
County Planning Department
County Hall Penrhyn Road
Kingston upon Thames
Surrey
KT1 2DY

Date: 17th June 2020

Dear Mr. Maxwell,

SCC ref: 2019/0072 and WBC ref WA/2019/0796

SITE: Land South of Dunsfold Road and East of High Loxley Road, Dunsfold, Surrey.

PROPOSAL: The construction, operation and decommissioning of a well site for the exploration and appraisal of hydrocarbon minerals from one exploratory borehole (Loxley-1) and one sidetrack borehole (Loxley- 1z) for a temporary period of three years involving the siting of plant and equipment, the construction of a new access track, a new highway junction with High Loxley Road, Highway improvements at the junction of High Loxley Road and Dunsfold Road and the erection of a boundary fence and entrance gates with restoration to agriculture.

APPLICANT: UKOG (234) Ltd.

Further to my previous **strong objection** dated 11th May 2020 with reference to the lack of analysis by the applicant in their Transport Statement for the vertical alignment at the junction of High Loxley Road and Dunsfold Road, I have commissioned a further professional examination which demonstrates that an Abnormal Indivisible Load Vehicle (AILV) is predicted to ground when entering/exiting High Loxley Road.

Working from a detailed topographical survey of the area produced by Cadmap Ltd., and the data presented in the applicant's Transport Statement information regarding the specification of the AILV, a vertical plane swept path assessment has been produced using Autotrack by Paul Mew Associates (PMA) which demonstrates the predicted grounding of an unladen vehicle entering High Loxley Road from Dunsfold Road (see Figure 1.1). In performing this analysis, PMA have remarked that the vehicles used in the applicant's swept path assessment are entirely bespoke therefore PMA have made the closest possible match to the AILV as possible based on the data available.

Our investigations went further, measuring the physical carriageway widths along the length of High Loxley Road between the junction and the proposed site access, which was not part of the swept path analysis provided by the applicant; from table 1, you will see these vary between 2.6m and 3.1m , which compares with the large HGVs requiring access being between 2.75 and 3.4m wide (taken from the applicant's drawings). This means that the required vehicles cannot reach the site entrance without overriding the verges, with major damage to the road pavement inevitable. Existing surface water drainage is by ditch(es) which would also require survey and checking for capacity/functionality.

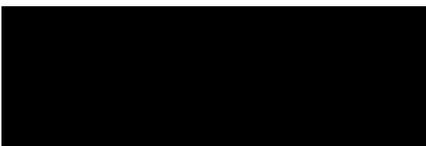
The applicant has provided no evidence that they either understand these constraints or have a workable solution to these physical barriers to access to the site by the required vehicles. As well as significant engineering works to reprofile the B2130 junction, widening of High Loxley Lane will be required, along with associated drainage and edge strengthening works. For such a scheme, the Applicant would be expected to give detailed consideration to the presence of buried utilities and services; for example, our survey identified water mains in the vicinity of the B2130/High Loxley Road junction, and it is my understanding that the water main serving my own property runs from there along High Loxley Road, likely to be at a shallow depth. This would also require detailed investigation as part of any improvement scheme.

On 17th June, I attended an online meeting with SCC Highways Officers, Richard Cooper and Frank Apicella, our County Councillor, Victoria Young, [REDACTED] and [REDACTED]. This was most helpful, in particular allowing us to explore the implications of our findings. Officers agreed that, in the event of the physical constraints of an access not proving adequate for the proposed vehicles to access the site, this would be materially significant not least on highway safety grounds. Furthermore, Richard Cooper said that the usual approach to solving such an issue would be by a s278 Agreement between the Applicant and the County Council, but any solution at this particular junction would necessarily be constrained by location factors including diversion of utilities, and land ownership.

In addition to requiring a s278 Agreement as a Pre-Commencement Condition, we noted the views of Officers that other Conditions may also need to be strengthened. This could include more robust monitoring of the site operator's compliance with the finally agreed Construction Traffic Management Plan, to which end the idea of continuous CCTV monitoring of traffic at key locations such as Pratts Corner was considered appropriate. An extension of draft Condition 8, linked to 9(i), should be considered to give a guarantee of restoring the road condition, although this might be included as part of the s278 Agreement. I would also support Officers suggestion that a penalty notice scheme for non-compliance could also be introduced, with stringent sanctions if thresholds are breached.

In conclusion, a decision to permit this application in the knowledge that vehicles required to access the site via High Loxley Road cannot physically do so would therefore be wholly unsound, and does not accord with the requirements of the NPPF not to cause significant harm in transport terms. Furthermore it is not in accordance with Surrey County Council Policy MC15(iii). Should a solution be sought via a s278 Agreement, this would require further investigation, design and legal negotiation between the parties.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Tom Gordon

Table 1 – High Loxley Road - Measured Road Widths

Centreline distance along High Loxley Road (cumulative)	Width of metalled road surface	Notes
0m (65m)	3.1m	First measurement at approx. 65m from Give Way line at junction with B2130
20m (85m)	2.8m	
20m (105m)	3.1m	
10m (115m)	2.7m	Adjacent to agricultural field entrance
20m (135m)	3.0m	
50m (185m)	2.6m	
15m (200m)	2.7m	Approx. location of start of proposed new site access

9A, LYDIA PARK
STOVOLDS HILL
CRANLEIGH
GU6 8LE

18th June 2020

Dear Councillors

SCC REF 2019/0072 and WA 2019/0796 UKOG APPLICATION FOR A WELL SITE ON LAND SOUTH OF DUNSFOLD ROAD

We are writing as representatives of the Gypsy, Roma and Traveller community who live permanently and lawfully on the sites at New Acres and Lydia Park, Stovolds Hill, Cranleigh, GU6 8LE.

There are 85 homes, accommodating approximately 340 people on the sites. Many of us have been residents for over 30 years.

We are contacting you directly because we feel that our opinions have been totally ignored by Surrey County Council during the planning and consultation process for the UKOG oil well.

Our community has not received any direct communication from Surrey County Council and no one from the Planning Department has visited our sites or contacted us directly. In fact, it was not until our neighbours spoke to us this week, that many of us were even aware of the UKOG proposal.

We have now been told that, in the Officer's Report, it states that the Surrey Gypsy Community Forum was consulted and that they advised that they did not expect traffic or noise to be an issue.

Traffic may not be an issue for us because the entrances to Lydia Park and New Acres are in Stovolds Hill, although the small roads leading to the oil well site are far too narrow to handle large vehicles, and this will result in long traffic jams that will tail back along Dunsfold Road, blocking the junction with Stovolds Hill.

However, noise and pollution are much more serious.

We live in chalets or mobile homes which are not as well insulated, or sound proofed as ordinary houses.

The nearest home on Lydia Park is 395 metres from the oil well.

We are more vulnerable to noise, (especially at night), odours, dust, air pollution and gas.

We have been told that, when this area was drilled in the past, the operators had to abandon the well because they hit sour gas, which is deadly.

The thought of our families being exposed to long-term noise and with the threat of odour, air, dust, and the danger of a possible escape of gas, is totally unacceptable.

We are really upset that none of this was explained to us by the Council and that no one has consulted us, even though we are by far the greatest number of residents living near to the oil well.

This displays a total disregard for our way of life and the safety of our families and children.

Please reject the proposal.

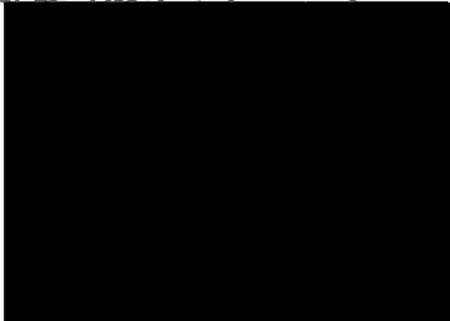
Yours sincerely



R. Butcher and others on behalf of residents of Lydia Park and New Acres.

ROBERT BUTCHER Jr
SHINADE BUTCHER
COURTNEY BUTCHER
ROBERT BUTCHER Snr
TORY GASKIN
PHOEBE GASKIN
AMY REID
JESSE RICHARDS
CARL RICHARDS
TOM WENMAN
RUTH WENMAN
ALBERT GOLBY
JEAN GOLBY
SIMON DOHERTY
TINA DOHERTY
NOAH HILDEN
THOMAS DOHERTY
HUGHIE DOHERTY

Robert butcher Jnr
Shinade butcher 9A Lydia park
Gub8Le
mitchell butcher
Courtney butcher 9A Lydia park
Gub8LE
Robert butcher snr 9A Lydia park



Tory & Pheobe gaskin 4 Lydia park Gub8Le



Amy Reid
Jesse & Carl Richards 11 Lydia park Gub8Le

Tom & Rutch Wenman 5 Lydia park Gub8LE

Albert & Jean golby 5c Lydia park
Gub8Le

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Michael Stallard

Written Statement in objection to ITEM 8 (Wintersells Road)

SCC PLANNING AND REGULATORY COMMITTEE, Thursday, 21 May 2020, 10.30 am

Dear Members

Thank you for the opportunity to speak in objection to this application. This is a waste scheme in the wrong location and it should be refused.

There have been 86 objections and both Local Authorities (Runnymede and Elmbridge) and the local Residents Association have objected, due to the potentially significant adverse effects in the locality.

The site is not allocated in the adopted Surrey Waste Plan (SWP) or Elmbridge Local Plan (ELP) (see O/R paras 95, 100). The wider area's designation as an Industrial Area of Search (ILAS) in the emerging Surrey Waste Plan is not an allocation ¹ for the application site nor the broader area given in the ILAS description. The ILAS designation covers a much larger area of 5 hectares and merely suggests the broader area might be suitable for a waste scheme. The County's own assessment of the ILAS is hardly positive in itself, with a range of adverse effects predicted in the emerging SWP for waste development in the ILAS.

At only 0.3ha, the site is called a 'small' site in the emerging SWP suitable for only up to 50,000 t/a of waste. However, the proposal is for just under 100,000 t/a which is double the County's own capacity suggestion. The applicant is squeezing far too much capacity into such a small site and it is no surprise therefore, that so many adverse effects on local amenity are predicted in the locality.

Being unallocated, the development is thus a departure from the Development Plan (DP). A range of adverse amenity effects have been predicted for the site and cause a conflict with a range of DP policies in the adopted SWP and ELP. Whilst some policies in the DP are supported by the scheme, there are many more that are not. The key, dominant policies in the DP are conflicted with and this mirrors the fact that this scheme is of too large capacity on this site, causing a number of adverse effects on local amenity. Notably, the officer's report has not addressed the required legal question of identifying, and assessing compliance with, the key and dominant policies in the DP, as WBP has in their objection. In my view, the development does not accord with the Development Plan overall. It is in conflict with the DP as a whole, which is the correct legal test.

In summary, this is a waste scheme in the wrong location and it should be refused. It does not accord with the Development Plan and there are no material considerations to suggest approval, including any policies in the NPPF. I urge you to reject the proposals - there are plenty of valid planning reasons for refusal and sufficient policy conflicts to warrant that refusal and to robustly resist any appeal.

Thank you.

¹ The draft SWP itself makes a continual, crucial distinction between 'allocated sites' and ILAS 'designated sites' through the Part 2 document and its associated Environmental Report (eg para 3.1.2, etc). ILAS are not allocations for the purposes of the Development Plan (see O/R paras 95, 100)

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Page 59



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Jason McPolin,
Managing Director, Irish Waste





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→ BlueMAC Support - page 27

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→ Applications and BlueMAC Solutions - pages 6 to 11

→ BlueMAC complete product range - pages 12 to 26

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reliability is built in**

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**Gary Short,
Shorts Recycling**

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Fines Clean Up

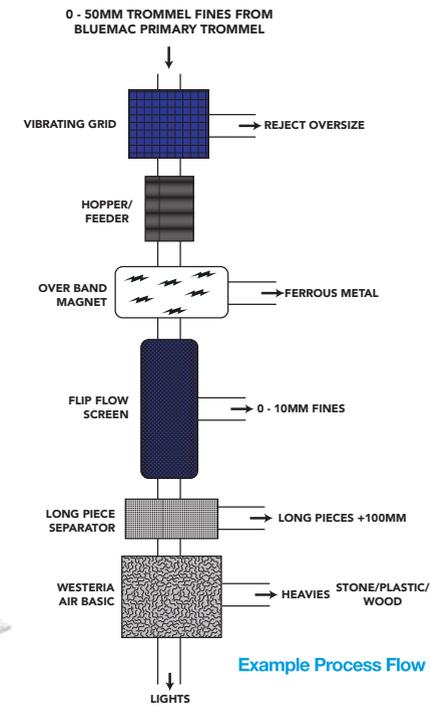
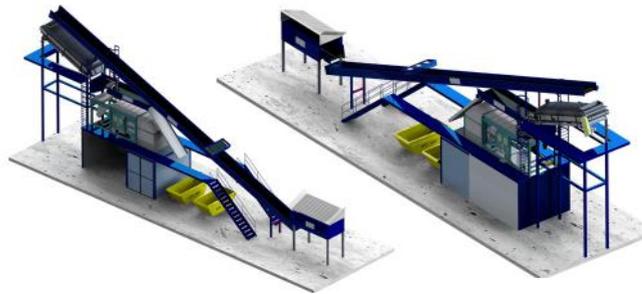
The introduction of the loss of ignition (LOI) test by the government, meaning fines containing more than 10% organic or combustible material will be subject to a considerably higher rate of landfill tax, is having a major impact on waste management companies. This legislation could mean an operator's landfill tax bill increasing from £20,000 to over £600,000.

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- Eddy Current separators



Pre & Post Plant Equipment

The advantage of choosing BlueMAC, is we provide the industry's leading MRF components and offer world leading supporting equipment to ensure your site meets your specific objectives. Whether that be through the incorporation of air density separation equipment or a Doppstadt static pre-shredder, our experienced sales team can supply the solution and the equipment that best suits your business.

Core Benefits

- ✓ Lower rate landfill tax increasing site profitability
- ✓ New revenue streams by recycling more separated material

Waste to Energy

RDF/SRF Production

Refuse Derived Fuel, (RDF) and Solid Recovered Fuel, (SRF) involves the process of creating fuel from waste. RDF is largely made up of municipal waste, consisting of combustible components such as biodegradable waste and plastic. This is then shredded and used within combined heat and power facilities where it can produce electricity. Solid Recovered Waste has a higher calorific value and is predominantly used within facilities such as cement kilns.



BlueMAC Equipment Solutions

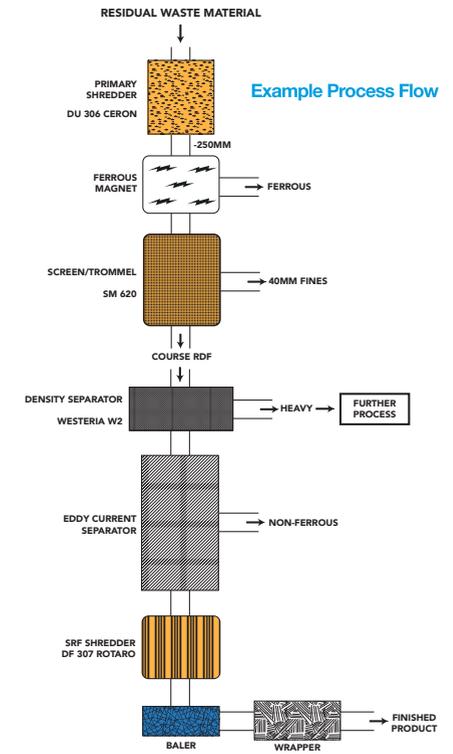
We offer a range of equipment that will allow your business to create RDF and SRF. These include:

- **Trommels**
- **Overband and cross-band magnets**
- **Hoppers/Feeders**
- **Ballistic separators**
- **De-stoners**

Pre & Post Plant Equipment

One of the benefits of dealing with Blue is that we can create the perfect solution for your business by combining BlueMAC equipment with the world's leading machinery to support the process. For the production of RDF and SRF this can include:

- **Doppstadt static shredders**
- **Marathon balers**
- **Powerscreen screeners**



Core Benefits

- ✓ **Reduces your landfill charges**
- ✓ **Creates an additional revenue stream**
- ✓ **Environmentally friendly by reducing reliance on fossil fuels**

Construction and Demolition Waste

C&D waste consists of unwanted material created by the construction industry. It is largely made up of rubble, wood and concrete as well as nails, electrical wiring and even hazardous substances. Much of this material has a recyclable value which can again create a revenue stream and reduce a plants landfill volumes and therefore charges.

BlueMAC Equipment Solutions

- Overband and crossband magnets
- Trommels
- Conveyors
- Vibrating pan feeders,
- Picking stations



Pre-Post Plant Equipment

- Powerscreen screeners
- Westeria air density separators
- Fuchs material handlers



Core Benefits

- ✓ Lower rate landfill tax & be more profitable
- ✓ New revenue streams by recycling more separated material

Commercial and Industrial Waste

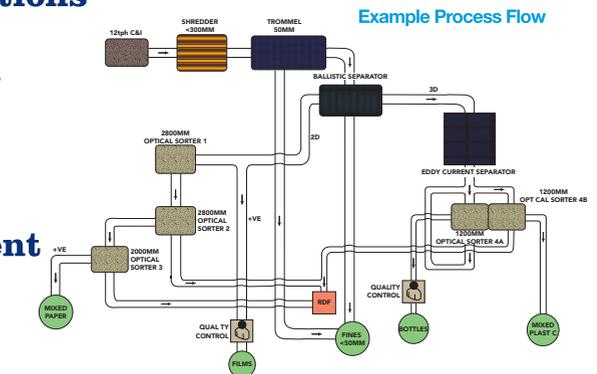
This type of waste is derived from premises which are used for the purpose of trade, education, health, sport or entertainment. As with other waste streams there are valuable materials contained within it which BlueMAC can separate out. This waste can also often contain a lot of light plastics which can be used for the production of RDF.

BlueMAC Equipment Solutions

- Trommels
- Overband and crossband magnets
- Optical sorting technology
- De-stoner
- Eddy Current Separators

Pre & Post Plant Equipment

- Air Density Separators
- Doppstadt Shredders
- Marathon Balers



Core Benefits

- ✓ Less volume going to landfill
- ✓ RDF production



Extract light plastics for profitable RDF production via optical sorting technology

Municipal Waste

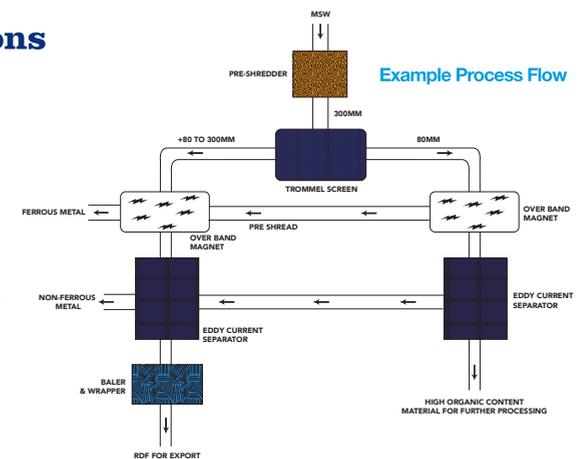
This is the general waste from residential properties, which is usually placed within black bags. A BlueMAC plant can separate out the diverse range of materials that can be found within this waste stream allowing for a large percentage to be recycled and the remainder to be converted into RDF to produce energy.

BlueMAC Equipment Solutions

- Bag opening feeders
- Picking stations
- Trommels
- Ballistic separators
- Over-band and cross-band magnets

Pre & Post Plant Equipment

- Doppstadt shredders
- Marathon balers
- Westeria air density separators



Core Benefits

- ✓ Huge environmental benefits due to lower volumes going to landfill
- ✓ Lower landfill charges
- ✓ RDF energy production

Dry Mixed Recyclables

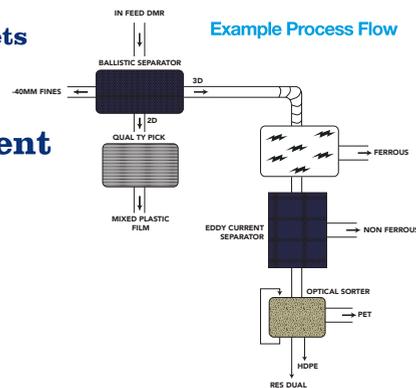
This particular stream is a mix of the recyclable elements of waste, such as paper, glass, plastic, cardboard and metals. Naturally this needs to be separated out so it can be baled and sold on.

BlueMAC Equipment Solutions

- Optical sorters
- Eddie Current
- Over-band and cross-band magnets
- Blowers

Pre & Post Plant Equipment

- Marathon balers
- Fuchs material handler



Green Waste

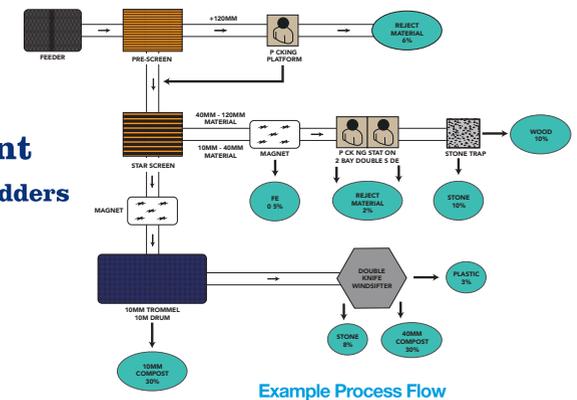
Green waste is that which is biodegradable, such as grass, branches, hedge trimming and flower cuttings as well as food waste. With the right equipment this waste can be converted into high grade compost.

BlueMAC Equipment Solutions

- Trommel
- Belt feeder
- Picking station

Pre & Post Plant Equipment

- Doppstadt high & slow speed shredders
- Fuchs material handler
- Doppstadt trommel screen



Core Benefits

- ✓ Production of high value recyclables
- ✓ Low running cost machinery



Core Benefits

- ✓ High value revenue stream



Page 69

Profit from waste ferrous and non-ferrous metal extraction



Scrap Metal

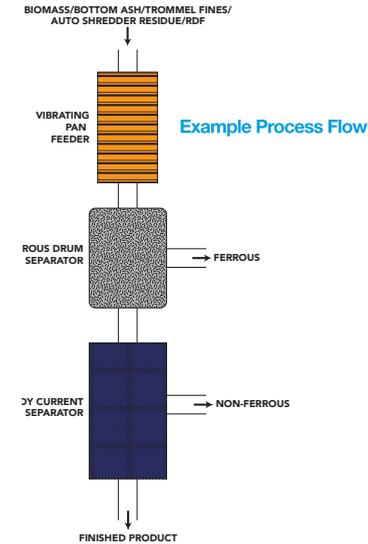
BlueMAC can implement the technology required to sort and separate both ferrous and non-ferrous material. This can be from pure scrap metal or from other types of waste streams.

BlueMAC Equipment Solutions

- Eddy Current separators
- Mobile All Metal separator
- Over-band and cross-band magnets
- Picking stations

Pre & Post Plant Equipment

- Fuchs material handler



Core Benefits

- ✓ High value revenue stream
- ✓ Creates end product free of metal contaminants



|| The decision to purchase a new MRF, as part of a £500,000 investment, was taken to make the business more efficient, safer and more profitable. We did look at other potential suppliers as well as BlueMAC but the final design and quality of build went in BlueMAC's favour, especially when combined with their vast experience and engineering capabilities. ||

**Williams and Williams
Melin Plas Du Pwllheli**



Feeders

BlueMAC specialises in all types of feeders for many industries. All can be built to any specification for even the most demanding applications.



■ Belt Feed Hopper

Our belt feeders ensure an efficient and consistent flow of material is fed into the plant to protect against surges. A tough and durable steel chassis offers life longevity.



Overspill discharge plates prevent material going underneath the hopper.

■ Pan Feeder

Our aggressive, heavy duty vibrating pan feeders are designed to deal with large quantities of the most challenging waste, including materials from the construction and demolition industries. Made to your exact specification our pan feeders deliver an even distribution of material to your MRF plant.

■ Bag Opening Feeders

Designed to penetrate and split the bags found in municipal waste, these feeders separate the material inside without shedding it into unmanageable pieces. This technology improves the efficiency of the recovery process in other areas of the plant.

■ Metering Drum

Our metering drum hopper incorporates a robust rotating drum that prevents material surges and ensures a consistent feed. This maximises the efficiency of the whole plant, producing material that is more easily sorted downstream, either by manual or automated processes.

[This is just a selection of feeders manufactured by BlueMAC. To discuss these and other potential options for your specific applications](#)

Call us on: +44 (0)288 775 5139

or email sales@bluemacmanufacturing.com



Screens

All BlueMAC screens are designed with maximum efficiency, throughput and serviceability in mind. As with all our plant components, we manufacture to the customer's exact specification.

■ Flip Flow Screens

Working with our partner Spalec, we can incorporate heavy duty Flip Flow screens within your MRF plant. The rigorous action of the screening frames allows for even the most difficult materials to be separated into a variety of sizes.

■ Trommel

Removing small fractions, commonly termed as fines, from the waste stream makes the remaining material easier to handle for both operatives and processing equipment.

The trommel drum holes determine the size of the fines extracted, with them usually being between 15mm and 40mm in diameter. Depending on your operation, waste stream and throughput volume, we design and manufacture the trommel and drum to meet your requirements, ensuring the effective removal of fines from the stream.



Maintenance friendly design on our screens and across the BlueMAC range.

What we saw and heard from the owners of the plants convinced us that a BlueMAC system was the best option, and of course our long relationship with Blue made the choice that much easier.

James Brown, Murray Browns, Scarborough

Ballistic Separators

Designed to separate out materials such as plastic film, paper, cardboard and fibres, as well as metal cans, plastic bottles, wood and stone. Light materials are pushed up the incline of the ballistic separator by paddles, with heavier materials bouncing or rolling down the separator's slope. Finer particles can also be collected with optional variable screen openings.

Our ballistic separators can handle a variety of different material types including municipal solid waste as well as commercial and industrial waste. Several separators can be configured to address various sorting challenges.

[For more information on these BlueMAC screens or to get a quote](#)

Call us on: +44 (0)288 775 5139

or email sales@bluemacmanufacturing.com



“ What impressed us about BlueMAC was that they were focused on our requirements throughout the entire buying process, never trying guide us into what they wanted to sell.

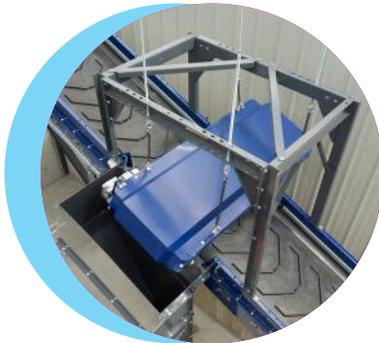
Robin Baird,
Falkirk Council

Sorting

From picking stations to the high-tech sensor-based optical sorting technology, gain additional revenue streams via BlueMAC's reliable and cost effective sorting solutions.

■ Static Metal Separation

Metal - the most valuable recyclable material in any waste stream. BlueMAC offers a range of solutions for the safe removal of both ferrous and non-ferrous materials. Whether you are at the initial concept stage of a recycling system or require a retro fit to an existing plant.



Ferrous and non-ferrous metal - extract the most valuable material from your waste stream and increase your recycling plant's profit.

Magnet for Ferrous Removal

By utilising various magnetic solutions, ferrous metals can easily be removed from the waste stream, significantly adding to the recycling plant's profitability in the process. Options include overband/crossband magnets as well as inline magnets.

These types of metal separators are suspended above the conveyors and as the waste passes underneath, the ferrous metal is pulled out. This is then moved to a release point and collected in a container.

Eddy Current for Non Ferrous

BlueMAC Eddy Current solutions ensure efficient and effective recovery of non ferrous metal. Aluminium cans and copper recovery is a hugely profitable component in any plant and should be given serious consideration.

For further information about BlueMAC static metal separators or to get a quote

Call us on: +44 (0)288 775 5139

or email sales@bluemacmanufacturing.com

■ Mobile Metal Separation

Our tracked, metal separators bring flexibility to a site. Naturally the ferrous and particularly the non-ferrous material can generate new revenue streams for your business. It is however also the quality of the remaining material, particularly wood for biomass, that is improved. Our customers often identify the opening of new markets due to the quality of their metal free biomass product, which also brings a higher price.



Our user-friendly control interface highlights, via an image of the machine, exactly what parts are being operated.

■ Mobile All Metal Separator

The Mobile AMS - All Metal Separator is a tracked self-propelled machine designed to separate ferrous and non-ferrous metals from the feed material. The machine consists of a vibratory pan feeder discharging onto a rare earth magnetic drum separator which in turn discharges onto the Eddy Current separator.

Three conveyor discharge

Two conveyors discharge ferrous and non-ferrous material to the side of the machine and a third conveyor discharges the final screened product to the stockpile.

Track mounted machines

All of the machine parts are mounted onto a chassis, which in turn is mounted onto a pair of tracks to allow for movement over uneven or unprepared surfaces.





■ Mobile Eddy Current Separator

The Mobile Eddy Current Separator is a self-propelled machine designed to separate non-ferrous metals from the feed material.

The machine consists of a vibratory pan feeder discharging onto a horizontal conveyor belt. The conveyor belt transports the material to the separating rotor at the head of the conveyor. As the material passes over the rotor Eddy Currents are induced in the non-ferrous metals. The Eddy Currents generate an electromagnetic force which repel the non-ferrous metal. This force affects the trajectory of the non-ferrous metals allowing a splitter plate to be positioned to separate the material streams. The splitter section of the machine includes three conveyors, two discharging to the front of the machine to stockpile the material screened from the non-ferrous metals. The third discharges to the side of the machine and conveys the non-ferrous metals to a suitable skip.



The mobility of the Eddy Current means that it can work in tandem with various shredders across a site.



Watch our All Metal Separator in action

Scan in the QR code to play the video on your mobile.



“ Their engineers and servicing department are of the highest standard. Blue’s back up is second to none as is their responsiveness. ”

**John Dennan,
Alan Skips**

Picking Stations

BlueMAC picking stations or sorting cabins as they are also known, are designed with the safety and comfort of the operatives as a priority. Great consideration is given to lighting, dust suppression, emergency stops, shelter from the elements and working position throughout the design stage.

Although health and safety is primary in all our designs, BlueMAC also has to consider a number of other elements which are crucial to ensuring your picking station is right for you. The required throughput, waste stream to be handled, number of operatives and foot space available are crucial when considering the number of picking bays, belt width and length of cabin required for each specific project.

With our vast experience in the waste recycling sector, you can rely on BlueMAC to design and manufacture a picking station that allows your recyclables to be recovered efficiently in a safe environment for your staff.

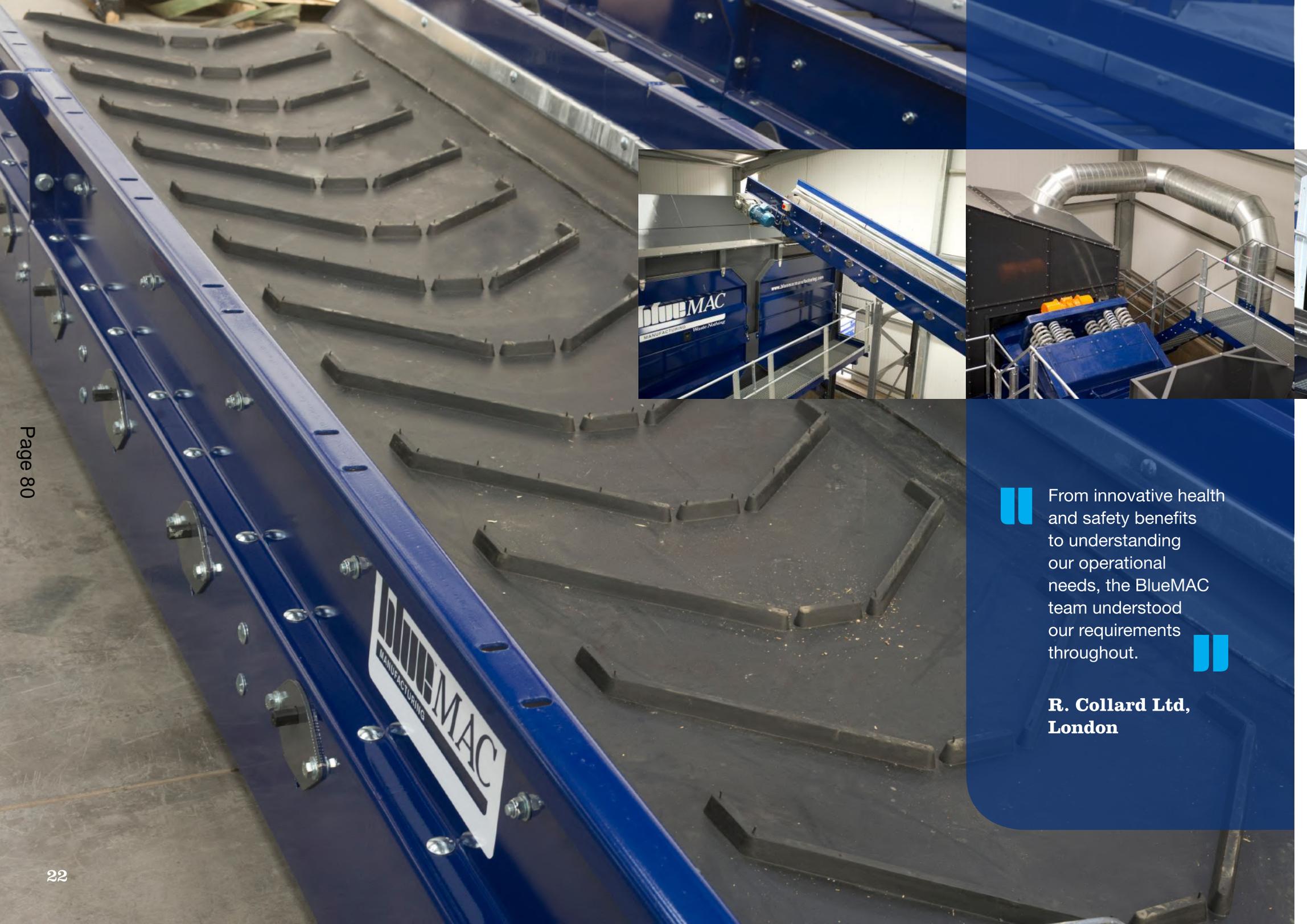


Foot indentation to allow operative to work with correct body posture.

For further information about BlueMAC picking stations or to get a quote

Call us on: +44 (0)288 775 5139
or email sales@bluemacmanufacturing.com





From innovative health and safety benefits to understanding our operational needs, the BlueMAC team understood our requirements throughout.

**R. Collard Ltd,
London**



Conveyors

BlueMAC manufactures solid, long-lasting conveyors to transfer all waste material throughout your plant.

The heavy duty, modular design features high impact, durable belts with energy absorbing bars, which can be altered in length at any time and retrofitted into existing sites. Our rollers can be changed quickly and easily to minimise downtime.



Extra wide stabilising supports for added strength and stability.

Air Density Separator

Highly productive removal of contaminants from the waste material using controlled air. Our cost effective solution separates the material based on density, taking away the unwanted waste to leave a cleaner aggregate.

De-stoner

Working closely with our partner General Kinematics, we install the most advanced DE-STONER® technology into our MRF plants. A de-stoner is a performance proven method of separation and classification for a wide range of recycled materials across a variety of industries.

Within the General Kinematics DE-STONER® models, the vibrating action and high velocity/low pressure air streams fluidise the material to remove the heavy items such as glass, metallics and stone.

Optical sorting

Reduce sorting operatives and save costs. Optical sorting technology utilises a powerful light to identify material types. It calculates the volume of the light's wavelengths which are either absorbed or reflected back into a lens. Different types of material such as plastics, fibres, wood and rubble can then be classified and sorted using this method.

For further information about BlueMAC sorting equipment or to get a quote

Call us on: +44 (0)288 775 5139

or email sales@bluemacmanufacturing.com



Pre & Post Plant Components

At BlueMAC we are delighted to be able to offer the world-leading range of Doppstadt equipment as part of our turnkey solutions.

As a long standing Doppstadt customer we can supply the complete range of Doppstadt mobile and static machinery. From slow speed front end pre-shredders for volume reduction, to fine shredders and air density separators for RDF and SRF production, Doppstadt equipment can be integrated into new and existing plants.

Our teams work closely with you to ensure your Doppstadt shredder fully integrates within your process, with material input and output specifications thoroughly considered from the start.

Doppstadt Slow Speed Shredders

Often used for volume reduction to prepare material prior to processing, the shredders ensure consistent piece size for the equipment and operatives to handle where necessary. Models in the range include the Doppstadt DW 206 Ceron, DW 2560E, DW 306 Ceron and the Doppstadt DW 4060E as well as the full range of mobile machines.

Doppstadt High Speed Shredders

The world renowned high speed range utilises the free swinging flail principle combined with the grinding basket to reduce product down to exact sizes. Models in the range include the Doppstadt AK235E, NZ435E and the NZ180E.

Doppstadt Splitter technology

This patented technology splits the material into three fractions. The small fractions fall through the gaps in the steel shafts, the light and long pieces will move in the direction of the conveyor and the cubical and heavy parts will be moved laterally.

Doppstadt mobile Windsifter technology

Doppstadt mobile Windsifter technology separates the material into three fractions depending on the density of the material.



Watch Doppstadt WS technology in action

Scan in the QR code to play the video on your mobile.



Powerscreen and Westeria

■ Powerscreen Screener

Powerscreen's mobile screening machines lead the way in technology, performance and reliability with the compact Warrior models being ideally suited to split your waste streams into more manageable fractions.

■ Westeria

The Westeria range of equipment works on the principle of using air density to separate the heavy inert stone material from the light RDF material. Initially the material is spread evenly onto a conveyor using patented disk technology. It is then presented to the initial separation area where a steel drum and air blower takes the lights over the top of the drum and the heavies fall to a conveyor below. The lights can then be further separated by density with the use of a suction chamber and further conveyor incorporated within the machine.



Balers & Material Handlers

Need a solution for baling waste, cardboard, papers, plastics, metals, cans and other materials?

BlueMAC offers the complete range of Marathon balers including the renowned Gemini Xtreme, Galaxy twin ram and the high performance TIEger models.



■ Gemini Xtreme - Closed End Horizontal Baler

Marathon's medium volume baler with manual tie, the Gemini Xtreme allows you to process a variety of material such as PET, aluminium or steel cans, paper, plastics, OCC, newsprint and similar material.

■ Galaxy 2R - Twin RAM Baler

Large volume baler with a separate ram for compressing recyclable material against a fixed wall and a second ram for ejecting the finished bale. Galaxy 2R Two-Ram Balers are available in a wide variety of sizes to fit all baling applications and can easily be incorporated within your BlueMAC material recycling facility.

■ Auto Tie Balers - TIEger

Unique features and unrivalled performance gives 10% reduction in wire consumption and related costs. The patented gear twister is the most exciting technology to hit the baler industry in the past decade. This tier uses highly efficient gear twisters, which means there are no twisted hooks or pigtails. The significant amount saved will typically justify the initial purchase.



10% reduction in wire consumption and related costs from gear twister technology with the Marathon TIEger series.

■ Fuchs - Material Handler

Blue are able to offer the complete range of Terex Fuchs material handlers to ensure the efficient running of your facility. These machines have been specifically designed to help maximise the amount of material that is loaded into your BlueMAC MRF.

Service & Support

Our emphasis of working closely and developing lasting relationships with customers long after the initial sale sets BlueMAC apart from the competition.

It is an ethos that has contributed significantly to the success and growth of the entire organisation and means our aftersales support is second to none. BlueMAC understands the importance of productivity and reliability and we appreciate the value in minimising downtime.



Increase your uptime and maximise return on your investment - our engineers and OEM parts keep your BlueMAC equipment maintained and running throughout its lifetime.

Our engineers

Our network of fully trained OEM engineers are able to offer support whenever it's required. The team has over 50 years of collective experience in welding and fabrications with extensive, hands-on knowledge of machinery and equipment installation, meaning they are able to resolve most technical challenges quickly.



Installation - Peace of mind right from the start

BlueMAC's engineers are fully trained to install all your machinery ensuring the equipment you have purchased is working to maximum capacity. Our team undertakes work in-line with the latest safety standards and manage the entire process, so your equipment is up and running in the shortest timeframe possible.

Our team are experienced, dedicated and highly motivated to work with you and your staff, offering training wherever it is required throughout the installation of your BlueMAC equipment. We will also carry out the installation at a time that is convenient to you, minimising disruption on your site.

OEM parts - Off the shelf and ready to go

Increase your uptime and maximise return on your investment - all BlueMAC parts are manufactured to the highest standard and are available off the shelf for next day delivery.

[Contact BlueMAC for more details of our service and support](#)

Call us on: +44 (0)288 775 5139

or email sales@bluemacmanufacturing.com



Get the best waste solution for your facility and budget

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or email sales@bluemacmanufacturing.com

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Co. Tyrone, Northern Ireland BT71 7EE

www.bluemacmanufacturing.com

● European
○ Business
○ Awards™



For attention: Katie Rayner, Stephen Jenkins, Aline Hyde, Christine Kelso,

Dear Ms Rayner

Re: SCC Ref: 2018/0144 and EL 3802– Application by Weybridge Skip Hire to change of the use Units 11 and 12 Wintersells Road, Byfleet, West Byfleet, Surrey KT14 7LF

Further to my letter of 18 May 2020, and on a re-read of the Officer Report, please find below some further comments on key areas, which I believe the council must take into consideration when making their decision regarding the Wintersells Road site. I have attached a number of graphics and photographs to support my statements

Summary

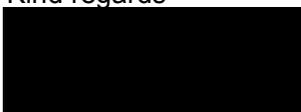
Section 1 Major points, completely unacceptable if Application receives approval

- **Site size and throughput tonnage - Key Points**
 - Tonnage proposed is in excess for the capacity of a small waste site (see *SWLP-2 Part-2-Sites-Final_NEW Submission 2019-01-25*)
- **Traffic congestion and vehicle movements - Key Points**
 - Wintersells Park could not cope with the proposed volume of traffic, neither can the A318 which has frequently tail-backs of a mile in each direction and which is heavily used by the ambulances
- **Site Design, Elevations, Pollution and Equipment - Key Points**
 - The elevations are out of keeping with the rest of the estate -equivalent to a 4-5 storey building with all others a maximum of two
 - The design has the external part of the conveyor dropping hardcore waste from the height of a two-storey building onto the ground, close to the entrance and public footpath, creating noise and dust/air pollution
 - WSH have still not provided a good indication of the actual equipment they will be using, its dimensions or decibels generated
- **Hours of operation - not in line with hours of other waste sites or the location**
 - Even the reduction in operational hours proposed by SCC, are still in excess of those of other Surrey waste sites, as discussed in the SWLP report *SCC Types of Waste Management Facility Jan 2019 v2*,

Section 2 Major issues with the application

- **Discrepancies between this application in relation to SCC Waste Plan**
 - Addresses further issues related to the size and type of operation as it appears that WSH are planning to operate three of the nine types of waste facility identified in the SWLP
 - Implications that the site will manufacture recyclable materials
 - No weighbridge on site - weigh will be assessed by a visual assessment
- **Monitoring of WSH responsibilities**
 - Concerns about how the operation of the site will be monitored by SCC, particularly as they appear to have allowed Cappagh to ignore many of the conditions imposed on the operation of their site in Byfleet Road

Kind regards



Jean Parry

18 June 2020

134 Byfleet Road
New Haw, Addlestone
Surrey KT15 3LE

Section 1 Major points, completely unacceptable if Application receives approval

1.1 Site size and throughput tonnage

The size of the application site and the proposed throughput tonnage, are far in excess of SCC guidance for waste sites and their types.

*The proposal is for a Waste Transfer Station on a site size of **0.3018 hectares**, with a throughput of **99,500 tons per annum** and **200, vehicle movements a day***

The table below copied from *SWLP-2 Part-2-Sites-Final_NEW Submission 2019-01-25*, indicates the hectares needed to support various tonnage throughput of waste sites. Units 11 and 12 with a combined size of only **0.3018 ha** is significantly less than the lowest of the indicative waste site size. The tonnage however is almost twice that of the highest tonnage for a small site, indicating that a between 5-10 ha would be required to support WSH proposals.

Indicative Scale	Size of facility Hectares (ha)	Throughput in tonnes per annum
Small	Up to 5	up to 50,000
Medium	5 to 10	50,000 to 120,000
Large	10 or more	120,000 or more

Added to the above, *SCC Types of Waste Management Facility Jan 2019 v2*, on Page 27 uses Unit 10, Wintersells road as an example of a WTS, and quotes its tonnage capacity as **17,400 tons per annum** with an area of **0.1281 ha**. It is also worth noting that the combined total area of units 10,11 and 12 still only 0.4362, less than half a hectare

Units 11 and 12 are less than 2.5 times the size of Unit 10, this would indicate a maximum of around 41,000 tons per annum as the capacity at the proposed site. The aerial view of the sites gives a good indication of the relative areas of the sites. Note also, the proposed covered area Units 11 & 12 is only **50%** larger than that of Unit 10, but the application for **5.7 times** more throughput than Unit 10. See marked up aerial view of the site below.

Note: I believe that the SWLP-2 is misleading when on page 13 it states that the ILAS of Wintersells Park is 5 ha. 5 ha is the total size of the park which is fully occupied by many different businesses,



1.2 Traffic congestion and vehicle movements

The A318 already suffers from congestion related to single file traffic movements at Byfleet and New Haw rail bridge with queues of up to a mile in both directions from it. The proposed additional 200 HGV vehicles a day accessing / egressing Wintersells Park will create even more problems for general traffic movements as well as problems within the estate. The A318 in this area is used many times a day by the emergency services which are often delayed due to large HGV's turning into / out of the roads or businesses in Oyster Lane.

Data used by WSH to model the effect of an additional 200 vehicles a day in/out of Wintersells Park was based on data for other sites from a number of years ago and not ones with characteristics similar to Wintersells Park. HGV traffic movement along Byfleet Road and Oyster lane is more than one a minute, for many hours of the day and sometime in convoy.

The calculations for the vehicle movements for the application site are in anycase in excess of what would be required to deliver the 99,500 tpa throughput. The recommended 200 movements a day currently requested and accepted by SCC needs challenging, as the trips needed support the movement of 99,500 tpa should be halved and importantly reduced appropriately for any reduction in limitation of the site throughput, to comply with indicative SWLP site sizes. See table at end of letter.

The photographic evidence attached to the Officer Report gives an a-typical perspective of the traffic situation both within Wintersells Park and the main road, the A318. The photos were obviously taken early in the morning as can seen from the shadows. Even so there is a considerable volume of vehicles parked on double yellow lines. I am attaching to this letter the photos I have submitted with earlier objections I have made regarding the application, which show the typical traffic and pedestrian problems within Wintersells Park and the main road, Oyster Lane / Byfleet Road (A318).

1.3 Site Design, Elevations, Pollution and Equipment

There are many issues with the design of the site, not the least being the height of the proposed new building, more than double of others within the Park and its proximity to the boundaries with neighbouring businesses at less than a meter wide will prevent access for dust and vermin prevention / clearance.

Elevations: The building is 13m (42.6 ft) high, more than twice the height of the retained 2 storey office building and with no justification having been provided for the height. This is also more than twice the height of Unit 10's WTS building and is also higher than WSH's current operation. As can be seen in the attached photos, including the ones of the interior of WSH's current operation. Furthermore as shown on the attached graphics the external conveyor and blower are higher than an average house. What is the justification for the building height/ Is it just to meet a cubic capacity measurement as requested in Section 20 of the application form?

Also with reference to Unit 10, Unit 10 has both an extractor 'filter' (?) on the side of the building and a chimney type unit which I have noticed when in operation loud noise filters out through it and presumably dust as well. However, there is no indication anywhere on the plans for Units 11 & 12 to show how dust will be extracted from the building. WSH should provide a statement of how they propose to remove the dust that is generally within the building and not that which is just on the floor.

Pollution: Some of the picking areas have, in the latest iteration of the design are now shown as being covered, others however remain external. The external ones are at the end of the conveyor which will deposit waste from a height of approximately 4.5m (14 ft) into collection bays on the ground. It is also shown that there will be a 'Blower' positioned above the external part of the conveyer to operate at a height of 6.3m (20 ft) above the ground and higher than the adjacent businesses building's and blowing, ostensibly, the dust; presumably back into the building. There is however no indication of how this will work in practice.

As can be clearly seen on the applicant's elevation plans, all this external working is greater in height than a two-storey building. It is also over 4 times the height of the boundary concrete / fencing at 2.5m and 2.4m respectively in height. The final hardcore bay only around a lorry length from the site entrance, thus there is no protection whatsoever, for dust and pollution as well as noise escaping from the site.

The marked-up site layout plan and the elevation diagrams are provided at the end of this letter together with photographic evidence.

Equipment: Throughout the consultations, WSH have consistently avoided clarity regarding the equipment they propose to install and use on the site apart from providing the following table of equipment in the PDAS and adding

4.1.2 Additional plant will be hired in during busy periods or to replace temporarily broken equipment.

4.1.3 Waste will be moved, loaded and unloaded using the loading shovel and 360° excavator, which will also be used to crudely sort the waste.

Table 1: List of Plant & Equipment

Item	Number	Function
Loading shovel (waste handler)	1	Loading/unloading/movement of waste
360° excavator	1	Loading/unloading/movement of waste
Mechanical treatment plant	1	Mechanical separation of waste
Picking line	1	Hand sorting of wastes

There is a considerable amount of equipment involved in this type of operation and I believe that both the Council and the general public should be made aware of what is proposed as the noise emanating from the building, and externally is likely to be totally unacceptable in built-up commercial, residential and recreational areas such as the location of Wintersells Park.

It also appears from the Officer Report that either WSH have made more changes to their application, or they have misled the Council regarding the equipment since in reference to the additional working hours requested the Officer Report states on Page 239 para 252

..... *"The additional hours of processing as requested by the applicant (18.00 to 22.00 Monday to Friday and 07.00-17.00 on Saturdays), are to be confined to the building with no extra deliveries or collections within these hours. **It is anticipated that only one tracked excavator and the waste recycling plant will be in use during this time**"*

NOTE: The only reference to the number of excavators is as referenced above in Table 1 of the PDAS I am separately attaching, a BlueMac brochure showing examples of the types of equipment likely to be considered for the site. An extract of the **PDAS section 6.4** describes how the mechanical treatment plant will work, (from which I was able to deduce the type of equipment required). This is attached at the with the graphics and photos in Section 3

1.4 Hours of operation - not in line with working hours of other waste sites or the location

WSH originally proposed the following operational times in their PDAS

2.3.3 It is proposed the site will be open for the acceptance and removal of waste during the following hours:

*Monday to Friday 06:30 – 18:00 Saturday 07:00 – 17:00 Sunday/Bank holidays **CLOSED***

2.3.4 It is proposed to operate the plant i.e. for the processing waste during the following hours:

*Monday to Friday 18:00 – 22:00 Saturday 07:00 – 17:00 Sunday/Bank holidays **CLOSED***

The only activities on site which will be permitted to continue outside of these hours are maintenance works.

Note: None of the other local waste operators work evenings and none work weekends after 12.30

SCC has recommended as a condition of permitting the development, these hours are to be reduced. However, the recommended hours still exceed those normally worked by other waste sites and are also in excess of those stated as normal operating hours in the *SWLP Types of Waste Management Facility - January 2019 v2*.

Operational timings – Please see comparison of times with nearby operations, below. Not only are hours of their collection / despatch times longer than others, Weybridge Skips are proposing evening processing work, something not carried out by the other companies in this area. If this application is approved the operational hours must be brought in line with other operators. Noise is more noticeable in the evenings when main traffic is reduced See table below of timings

Officer Report Page 261 Condition 3

No authorised operations or activities, including the access and egress by HGVs, shall be carried out, and no light illuminated, except between the following times:

For the acceptance and removal of waste including the use of plant:

0700 – 1800 Monday to Friday

0700- 1300 Saturday

For the operation of plant only inside the building and no HGV access or egress:

1800-2030 Monday to Friday

1300-1700 Saturday

NOTE: WSH have stated that they expect the **recycling processing to be operational 9 hours a day –**
Why cannot all processing be accommodated within the normal operational hours of the site.
 And as mentioned previously re; equipment Regarding evening operations, WSH have obviously told SCC that during the evening 'It is anticipated that only one tracked excavator and the waste recycling plant will be in use during this time

Company	Mon-Fri Operating	Saturday Operating	Processing Times	Comments
Weybridge Skip Wintersells Proposed times	07:00 - 18:00	0700 -13:00	1800-2030 Mon to Fri 1300-1700 Sat	Processing Times: For the operation of plant only inside the building and no HGV access or egress
Weybridge Skip Weylands	07:00 - 17:30	07:00 -12:30	None	NOTE: 30 mins a day less than proposed site
PM Skips Wintersells Park	07:00 - 17:00	08:00 -12:00	None	
Cappagh CD&E waste Byfleet Rd	07:00 - 17:30	08:00 -13:00	None	None beyond stated open times and no lorries shall leave the site before 07:30 on weekdays and Saturdays.
Fox and Vixens Skips -Byfleet	07:00 - 17:00	Closed	None	Monday start is at 07:30
Acom Skips	09:00 - 17:00	09:00 - 17:00	None	
Chambers Guilford recycling	07:00 - 17:30	07:00 -12:30	None stated	Unknown if processing takes place after opening times

Section 2 Major issues with the application

- **Discrepancies between this application in relation to SCC Waste Plan**
- **Monitoring of WSH responsibilities**

2.1 Discrepancies between this application in relation to SCC Waste Plan

There are 9 different types of waste sites in Surrey. Each of which has a different site sizes and constraints and have different scales, visual impacts, noise levels, treatment processes and location requirements.

1. **Construction, Demolition and Excavation (C, D & E) Waste Recycling**
2. *Community Recycling Centres (CRC)*
3. **Waste Transfer Station (WTS)**
4. **Materials Recovery Facility (MRFs)**
5. *Metal Recycling and End of Life Vehicles (ELVs)*
6. *Composting*
7. *Energy from Waste (EfW)*
8. *Anaerobic Digestion*
9. *Disposal (Landfill)*

In various places in their documentation, Weybridge Ship Hire (WSH) is applying for THREE of the types. Not all can fit onto the site and not all of them would be acceptable even to the council.

Construction, Demolition and Excavation (C, D & E) Waste Recycling
Waste Transfer Station (WTS)
Materials Recovery Facility (MRFs)

The major differences between the three types of waste sites and their requirements/constraints identified in the **SCC Waste Plan Types of Waste Management Facilities – Jan 2019 v2** are given in the table below

	Units 11 & 12	C,D & E	WTS	MRF
Size of site	0.3 ha	1.0 -1.5 ha	0.5-1.0 ha	1.0-2.0 ha
Site Activities	Claims to do a mix of all C,D&E, WTS and MRF	Screening, crushing & washing	Receives waste in and bulks up for onward despatch	Recovers waste by separating waste types manually or by m/c for recycling or landfill
Throughput per year	99,500	50,000-150,000 tpa	300-150,000 tpa	20,000-150,000 tons pa
Vehicles per day	200 per day	HGV movements are relatively high	Generally large amount of HGV and other vehicle movements	Around 50-80 HGV movements per day at larger facilities.
Normal permitted hours of work	Asking for 06:30 – 22:00 SCC propose; 0700 - 1800 Mon -Fri, plus 1800 - 2030 Mon-Fri for processing	08:00 – 17:30 Mon -Fri	Not Stated	08:00– 7:30 Mon -Fri
Traffic Impact	<u>See comments from SCC Document re: MRF facilities where 50-80 HGV vehicles a day is considered High!!</u>	Impacts can be mitigated by placing limits on vehicle movements and locating facilities close main roads. One alternative is rail aggregate depots that recycle C, D & E waste.	Larger facilities have significant impacts from HGVs and other vehicle movements. To mitigate these impacts limits on vehicles can be imposed , facilities can be located close to main roads and routing options can be used.	Due to amount of waste handled HGV movements are high . To mitigate impacts facilities should be located less than 5km away from main roads and be provided with specific routing for vehicle movements
Proximity to sensitive receptors (Note this is from the 2017 report)		Facilities should be located at least 250m away from sensitive receptors. Facilities are not generally located this close due to noise issues.	Should be at least 250m away from sensitive receptors , however there are examples of sites being located closer than this.	Facilities can be located up to 100 meters away from sensitive receptors

Further confusion arises with statements in WSH's application, Site notices, the PDAS and the Site plan, which begs the question 'What is it that WSH are planning to use the site for? As it stands the application is a mish-mash of ideas without any substantial information about its real operation. WSH application states that in Section 20 of their application (Industrial or Commercial Processes and Machinery)

	The total capacity of the void in cubic metres, including engineering surcharge and making no allowance for cover or restoration material (or tonnes if solid waste or litres if liquid waste)	Maximum annual operational through put in tonnes (or litres if liquid waste)
Transfer stations	10000 Tonnes	99950 Tonnes

No other type of waste is mentioned in their application. However, in the Site plan and PDAS, reference is made to the **MRF**. The site notice also refers to Household, industrial and commercial waste, which has been specifically excluded by SCC as a condition of WSH permit

"... Change of use to a waste transfer station and recycling facility (*sui generis*) for the receipt and treatment of mixed, dry, non-hazardous household, industrial and commercial and construction, demolition and excavation waste,"

There are other unclear statements in the PDAS regarding the processing of the waste

Section 6.4.3 of the PDAS states

"The extraction of recyclate and manufacture of recycled products will be carried out to meet the specification of the destination site's exemption, permit or product requirements."

The statement regarding the manufacture of recycled products, together with statement implying they will be importing household, industrial and general commercial waste is very concerning.

There also appears to be no proper provision for a weighbridge, as in section **6.3.1 of the PDAS** states

"All loads of material which enter the site will be accompanied by the appropriate paperwork from the site of production with details of the material contained. The weight of the skip will be calculated using the conversion factors found in the table below:"

WSH in their Air Quality and Vehicle Emission reports give strong indications that all the vehicles will enter /exit Wintersells road towards from /towards Byfleet and the retail parks at Brooklands, because their customer base is in Elmbridge and to the south

This is blatantly untrue as the photos, attached, show a WSH lorry entering the Cappagh site in Byfleet Road after passing under the railway bridge, and show a skip next to the Co-op in New Haw

2.2 Monitoring of WSH responsibilities

I am concerned about the level and frequency of SCC's monitoring of the WSH operation, as the monitoring of the Cappagh site leaves a lot to be desired. A common condition applied to both the Cappagh and WSH operations, is that all vehicles must be covered. Both WSH and Cappagh are not complying with that condition as the photo shows an uncovered WSH truck with a full load of CDE waste entering the Cappagh site.

Additionally, the operating time and vehicle movement limitations are not being adhered to. If SCC cannot ensure that Cappagh comply with condition, why should there be any hope that conditions applied to WSH will be adhered to.

Section 3 Supporting Documentation

- Site Layout Plan
- Vehicle Movements Calculations
- Montage of Traffic Issues in Wintersells Park
- Montage of Traffic Issues in Oyster Lane (A318)
- Issues for Pedestrians on Oyster Lane / Byfleet Road
- Elevations of proposed Waste building
- Equipment likely to be required
- PM Skips Operatoion in Wintersells Park
- Clips of video from Weybridge Skip Hire's website
- Weybridge Skip Hire Lorry entering Cappagh CDE site in Byfleet Road
- Weybridge Skip Hire Skip in New Haw

Vehicle Movements

Given the over estimation of capacity in tonnage of Units 11 and 12, the number of vehicle movements should also be re-evaluated for following reasons

- Using the applicant's stated throughput volume and the types of vehicles delivering / removing the waste, the potential throughput could be as much as 220,000 tpa
- To achieve a throughput of 99,500 tpa. only 45 inbound loaded vehicles per day would be needed
- However, given the actual capacity of Units 11 and 12 based on the capacity of Unit 10, only 19 loaded inbound vehicles would be required per day to achieve the throughput of up to 41,000 tpa

NOTE: applicant states that a majority of input will be from their own skips of between 4 and 40 yard capacity. Based on an average skip weight content of 8 ton, the following calculations have been produced.

The vehicle movements given below are for inbound loads only. Thus, the maximum outbound vehicles double the daily vehicle figure - plus there would be probably a further 4 in and 4 out movements of bulk waste removal per day.

vehicle movements a day (into site full)	100
Average content 8 tons (can also use up to 16 tons)	8
Total potential in per day	800
Total over 5,5 day week	4,400
Total over 50 wk year (allows for bank holidays)	220,000

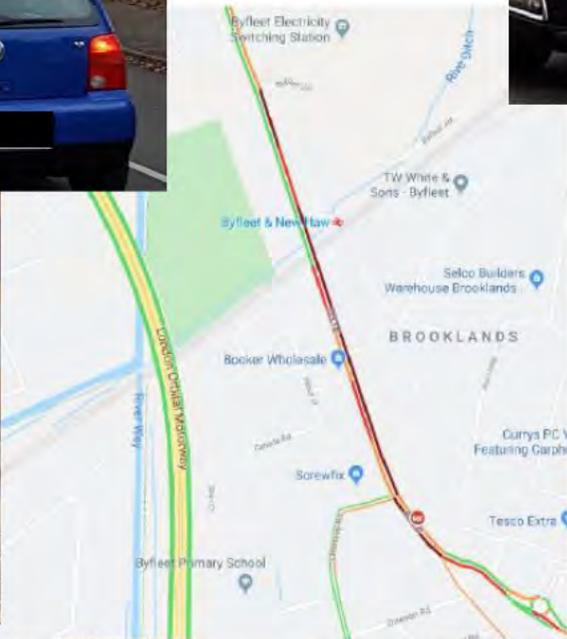
WSH Proposed throughput 'Throughput' per year	99,500
Divide by 8 being 8 ton skips	12,438
Divide by 50 (weeks per year)	249
No of skip loads of 8 tons required per 5.5 day week	45

Site Capacity 'Throughput' per year (based on site area)	42,000
Divide by 8 being 8 ton skips	5,250
Divide by 50 (weeks per year)	105
No of skip loads of 8 tons required per 5.5 day week	19

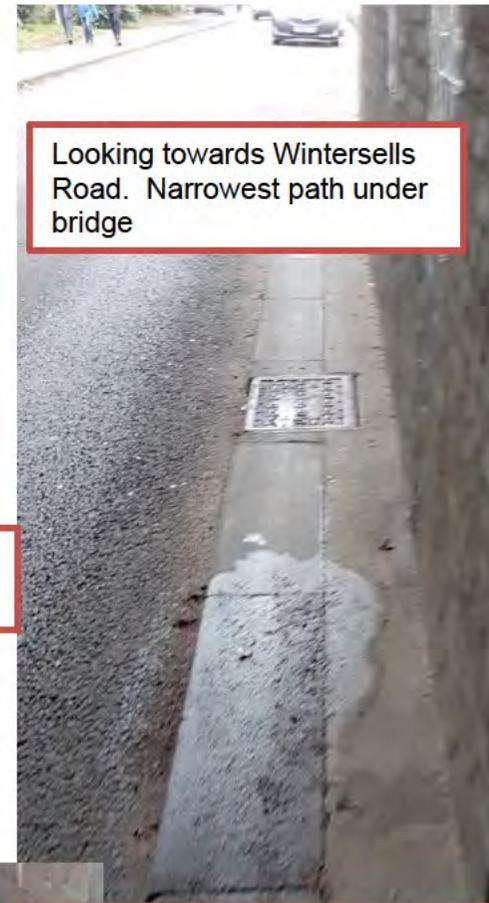
Montage of Traffic Issues – Wintersells Road Parking Issues



Montage of Typical Traffic Issues in Oyster Lane (A318) by Wintersells Road



Issues for Pedestrians on Oyster Lane / Byfleet Road



Looking towards Wintersells Road. Narrowest path under bridge

Looking towards Byfleet Road. Narrowest path under bridge

Parents and children take a risk under the bridge



Width of paving under bridge – c/f standard width kerbstone



Traffic just as bad in Byfleet Road



Pathway slightly wider on side heading towards Byfleet and New Haw Station



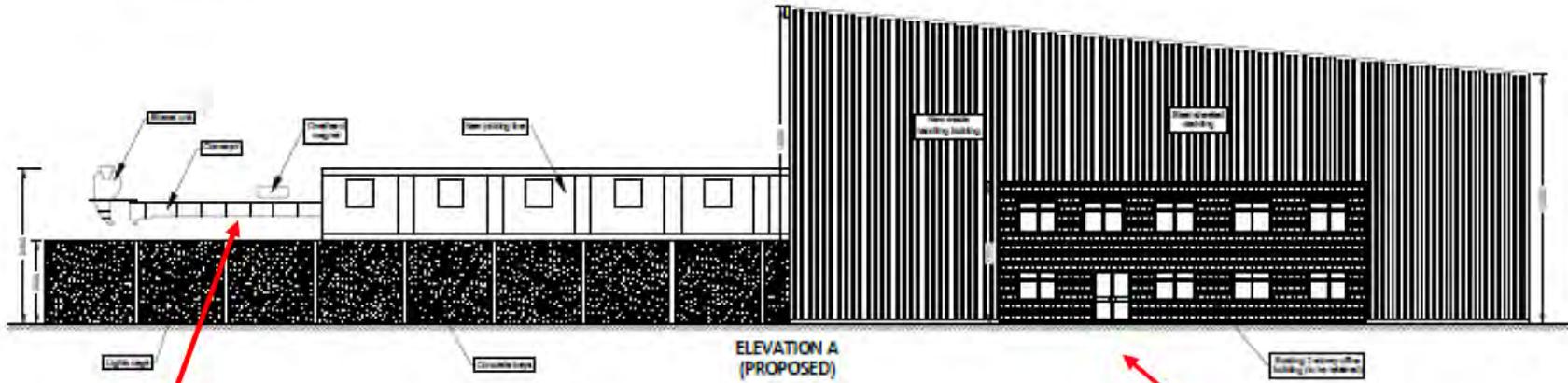
2018/014



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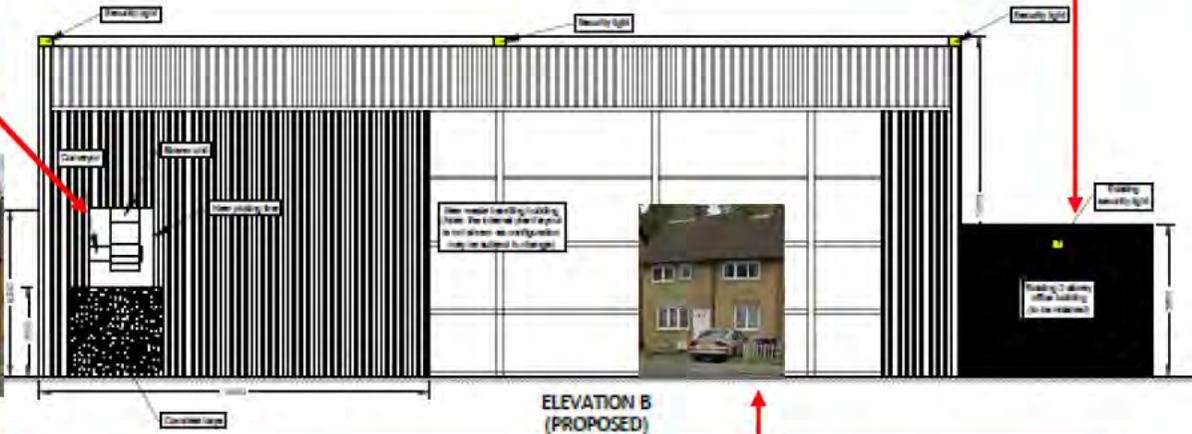
Page 99

Elevations



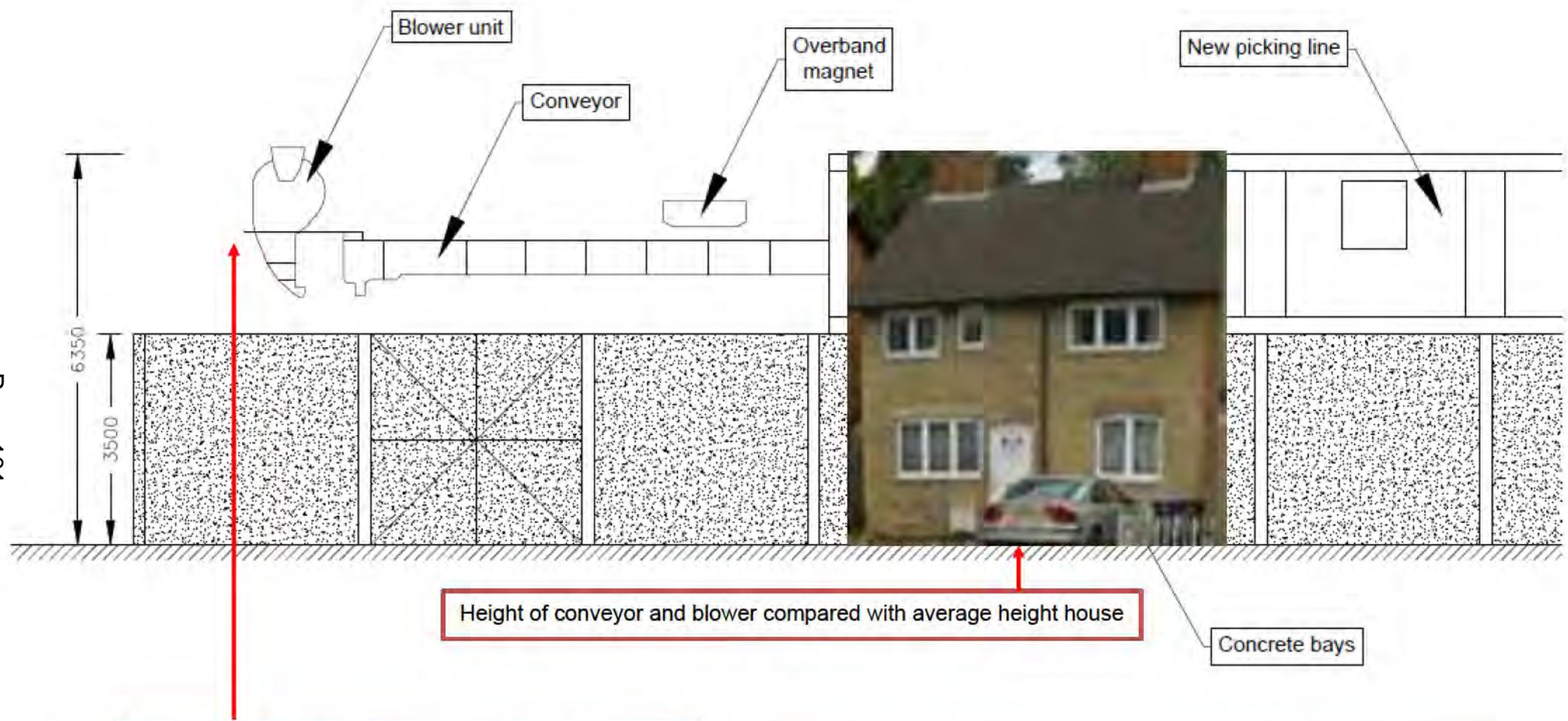
Conveyor – open to the air, sorting and dropping the largest C,D & E waste from height greater than the two storey building

Existing 2 storey building



Height of building and conveyor compared with average height house

Page 100



Height of conveyor and blower 6350mm (20.83 ft)
This is higher than the 2 storey building – see next slide

Important note: The existing concrete wall round the boundary of the site is to be retained – part of which will have existing old barbed wire on top. However this wall which will run parallel to the external conveyor (see above) will only be **2500mm high** is not only lower that the conveyor / blower it is also lower that the bins that the waste is dropped into (see site layout plan)



**ELEVATION A
(PROPOSED)**

Height of new building compared with average height house

Height of 2 storey building 5800mm (19.02 ft)
And the height of the new building at 13000mm (42.65 ft) is more than twice the height of the existing building and much higher than any of the other building on this estate.

Existing 2-storey office building (to be retained)



PM Skips – Conveyor depositing waste



PM Skip – Unit 10 Wintersells Park

Public footpath



Dust extractors?



Unit 10, 11 (to be demolished and 12 (retained office)



Clips from WSH video on their website

Note Roof Height – this is obviously not the same height as WSH design for Wintersells Park. If their current operation and that of PM skips (see Inset) is adequate, why has Unit 12 been designed so high



Equipment described in the WeyBridge Skip Hire's PDAS

The BlueMac brochure and web site <http://www.bluemacmanufacturing.com/products/recycling-systems>

identifies the different types of waste operation – eg: **C&E waste** operation requires different equipment from **C&I**. Which would imply that WSH would require much of the equipment listed in the BlueMac brochure

Though the PDAS states in the Equipment section of the report that they propose **1 Mechanical treatment plant**, they omit to say what that comprises. **Section 6.4.1** (see left), lists the equipment used in the mechanical treatment.

Please also note that in the PDAS, WSH also refer to the types of waste they anticipate processing, which fall into the following categories and also include (in their statements Household, Industrial and Commercial waste (HIC)).

Construction, Demolition and Excavation (C, D & E)
Waste Transfer Station (WTS)
Materials Recovery Facility (MRFs)

6.4 Mechanical treatment process

6.4.1 Once a mixed load has been accepted by the operator the contents of the delivery vehicles are discharged inside the recycling building in the waste reception bay; the following procedures will then take place:

- a) All mixed loads will be tipped in the waste reception area in the recycling building and **crudely sorted using the 360o (grab)** which will separate bulky materials and CDE waste from the stockpile prior to loading into the **hopper**. *Bulky wastes i.e. mattresses/carpets will be consigned to an adjacent bay* and exported landfill or suitably permitted site depending upon its composition. Wood will also be collected by hand or grab and deposited in the adjacent wood bay.
- b) The mixed waste is fed into a **feed hopper using a 360o grab**. The **hopper** then feeds the **flip-flow screen and soil/fines will fall through the rotating drum mesh** into a bay beneath the **flip-flow** and **onto a reverse conveyor which will deposit the fines/soils into a number of bays**.
- c) The remaining larger fraction **exits the flip-flow onto a separate conveyor which enters 6-bay picking line**. The picking belt moves slowly, enabling picking staff to remove recyclables and waste for landfill by hand and place them in the chutes next to the picking line. The chutes discharge into bays beneath the picking station.
- d) **The conveyor exiting the picking line** has an **overband magnet which removes ferrous metals to the bay below**.
- e) Waste which is not suitable for recycling is not picked and passes under the **magnet to be blown by a fan** unit into a cage at the end of the picking line for removal off site. The remaining **heavy fraction drops off the end of the conveyor into a stockpile for recycling and likely to be inert/hardcore waste**.

Note: the drop at the end will be at least 4m

Note mattresses should not be found in CD&E waste



Waste Processing Equipment

To require a height of 13m (40ft), are WSH planning an operation of this size?





Weybridge Skips Lorry uncovered and delivering uncovered CDE waste to Cappagh site in Byfleet road New Haw

This indicates that Weybridge Skips do conduct business in Runnymede



Weybridge Skips vehicle entering the Cappagh site. Both WSH and Cappagh are flouting conditions of operation granted by SCC to Cappagh





Skips in New Haw, Runnymede
within half a mile of Wintersells Park
Photos taken December 2019
This indicates that a) Weybridge Skip do
have business in Runnymede and b)
such types of skips are likely to contain
odorous and possibly hazardous waste

From: Jean Parry
To: [MWCD Environment/ENV/SCC](#); [Katie Rayner](#); [Stephen Jenkins](#); [REDACTED]@elmbridge.gov.uk; [REDACTED]@runnymede.gov.uk
Subject: Re: SCC Ref: 2018/0144 and EL 3802- Further comments related to Officer Report and Application
Date: 19 June 2020 14:41:04
Attachments: [Comments on SCC 2018-0144 18 June 2020.pdf](#)
[blue-mac-brochure-28pp_2808_final-min_20161128150825.pdf](#)

Dear Council Officers

Please find some further issues I wish to draw to your attention following a re-read of the Officer Report. I believe the attached points require further investigation and consideration before approval is given to the above application.

These issues relate to:

- ***Site size and throughput tonnage - Key Points***
 - Tonnage proposed is in excess for the capacity of a small waste site (see [SWLP-2 Part-2-Sites-Final NEW Submission 2019-01-25](#))
- ***Traffic congestion and vehicle movements - Key Points***
 - Wintersells Park could not cope with the proposed volume of traffic, neither can the A318 which has frequently tail-backs of a mile in each direction and which is heavily used by the ambulances
- ***Site Design, Elevations, Pollution and Equipment - Key Points***
 - The elevations are out of keeping with the rest of the estate -equivalent to a 4-5 storey building with all others a maximum of two
 - The design has the external part of the conveyor dropping hardcore waste from the height of a two-storey building onto the ground, close to the entrance and public footpath, creating noise and dust/air pollution
 - WSH have still not provided a good indication of the actual equipment they will be using, its dimensions or decibels generated – (Please also see the attached BlueMac brochure which I believe provides a reasonable indication of the equipment that would be required)
- **Hours of operation - not in line with hours of other waste sites or the location**
 - Even the reduction in operational hours proposed by SCC, are still in excess of those of other Surrey waste sites, as discussed in the SWLP report [SCC Types of Waste Management Facility Jan 2019 v2](#).

Section 2 Major issues with the application

- **Discrepancies between this application in relation to SCC Waste Plan**
 - Addresses further issues related to the size and type of operation as it appears that WSH are planning to operate three of the nine types of waste facility identified in the SWLP
 - Implications that the site will manufacture recyclable materials
 - No weighbridge on site – weight will be assessed by a visual assessment

Monitoring of WSH responsibilities

- Concerns about how the operation of the site will be monitored by SCC, particularly as they appear to have allowed Cappagh to ignore many of the conditions imposed on the operation of their site in Byfleet Road

I trust you will have time to look at these points in my attached letter

Kind regards

Jean Parry

Malcolm Brown

From: Robert Humphries [REDACTED]
Sent: 25 June 2020 21:54
To: MWCD Environment/ENV/SCC
Subject: SCC Ref 2018/0144 and EL3802

Units 11 and 12 Wintersells Road, Byfleet, KT14 7LF

Review of Officer Report

The above application should be rejected!

The location is totally unsuitable. Local traffic, especially with the pending /forthcoming application by Cappaph for their site to be made permanent in nearby Byfleet Road.

There is no scope for expansion to a small site.

There is already substantial local pollution.

The proposal is for excessive hours of operation.

Robert Humphries
98 Byfleet Road
New Haw
Addlestone
Surrey
KT15 3LE

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