SUMMARY REPORT

Land at Earlswood Depot, Horley Road, Redhill, Surrey RH1 6PN

Development of a Materials Bulking Facility for the bulking, storage and transfer of up to 110,000 tonnes per annum of Municipal Solid Waste; welfare/fleet administration building; weighbridge office and 2no. weighbridges; re-use building; external covered bays with hardstanding storage area; reconfigured vehicle parking providing 38no. additional spaces; and ancillary infrastructure, all accessed via the existing Earlswood Depot.

Key issues in determining this application will be compliance with the Development Plan, National and European policy, the protection of the Metropolitan Green Belt and the impact on the local residential, environmental and amenity interests.

The majority of the application site is identified with the Surrey Waste Plan 2008 and will be considered in accordance with the Key Development Criteria. A small part of the application site (owned by Thames Water) is beyond the Surrey Waste Plan allocation site boundary and will therefore be considered in accordance with Policy CW5 – ‘Location of Waste Facilities’. The entire application site is within the Metropolitan Green Belt and therefore the advice contained in the Government’s National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy CW6 ‘Development in the Green Belt’ is relevant. It is recognised in the application that the proposal involves inappropriate development in the Green Belt and factors have been put forward which the applicant believes contribute to very special circumstances.

Consideration will need to be given to the potential impacts arising from the development, in terms of the local environment and amenities. It will be necessary for the Authority to be satisfied that the proposal would not give rise to unacceptable impacts in terms of noise, traffic, air quality and visual disturbance.

Objections have been raised by Salfords and Sidlow Parish Council and numerous residents. Primarily the objections are concerned with the intensification in the site’s use and environmental impacts arising from this, though other concerns were also raised. However, subject to the use of appropriate conditions, no objections are raised by technical consultees such as the County Highway Authority, the Environment Agency, the County’s specialist consultants on noise / air quality / lighting / drainage, or the Borough Council’s development management or environmental protection team.
The site lies in the Metropolitan Green Belt where there is a general presumption against inappropriate development. The proposed waste development is inappropriate development and therefore the application falls to be considered as a Departure from the provisions of the Development Plan. Issues to be considered in determining this application are whether there are factors which amount to very special circumstances, which clearly outweigh the harm to the Green Belt that would be caused by reason of inappropriateness and any other harm. The proposal must be determined in accordance with the Development Plan Policy unless material planning considerations indicate otherwise, and the development should be capable of being operated without unacceptable harm to local environmental and amenity interests.

The proposed development would cause harm to the openness of the Green Belt, conflicts with one of the purposes of including land in the Green Belt in terms of encroachment on the open countryside, and has the potential to create other harm by virtue of transportation impacts. Very special circumstances should therefore be demonstrated in accordance with the provisions of the NPPF and Surrey Waste Plan 2008 Policy CW6. In this case, the applicant has considered environmental impacts and has suggested measures which technical specialists have advised are adequate to mitigate any other harm and Officers consider that robust very special circumstances have been demonstrated.

The recommendation is to PERMIT subject to conditions and referral to the National Planning Casework Unit as a departure from the Development Plan.

APPLICATION DETAILS

Applicant

SITA Surrey Ltd

Date application valid

5 September 2013

Period for Determination

5 December 2013

Amending Documents

- Revised Landscape and Visual Impact Assessment Figure 6.7 - Viewpoint 7: Earlswood Common and Lakes, received 25 October 2013
- Drawing No. EWT 01.4 Revision K, dated 25 October 2013
- Drawing No. EWT 02 Revision J, dated 25 October 2013
- Email dated 28th November 2013 from SITA UK
SUMMARY OF PLANNING ISSUES

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

<table>
<thead>
<tr>
<th>Waste Management Issues:</th>
<th>Is this aspect of the proposal in accordance with the development plan?</th>
<th>Paragraphs in the report where this has been discussed</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Need</td>
<td>Yes</td>
<td>67-73</td>
</tr>
<tr>
<td>• Alternative Site Assessment</td>
<td>Yes</td>
<td>74-93</td>
</tr>
<tr>
<td>• Location</td>
<td>Yes</td>
<td>94-95</td>
</tr>
<tr>
<td>Highways, Traffic and Access</td>
<td>Yes</td>
<td>99-124</td>
</tr>
<tr>
<td>Air Quality (Emissions, Dust &amp; Odour)</td>
<td>Yes</td>
<td>130-154</td>
</tr>
<tr>
<td>Landscape &amp; visual amenity</td>
<td>Yes</td>
<td>155-182</td>
</tr>
<tr>
<td>Noise and Vibration</td>
<td>Yes</td>
<td>183-193</td>
</tr>
<tr>
<td>Surface Water and Flooding and Contaminated Land</td>
<td>Yes</td>
<td>194-212</td>
</tr>
<tr>
<td>Ecology &amp; Nature Conservation</td>
<td>Yes</td>
<td>213-218</td>
</tr>
<tr>
<td>Lighting</td>
<td>Yes</td>
<td>219-222</td>
</tr>
<tr>
<td>Archaeology</td>
<td>Yes</td>
<td>223-224</td>
</tr>
<tr>
<td>Green Belt</td>
<td>No</td>
<td>227-259</td>
</tr>
</tbody>
</table>

ILLUSTRATIVE MATERIAL

• Site Location Plan
• Aerial Photograph 1, application site
• Aerial Photograph 2, application site

Figures:

Figure 1 – Extract from the submitted Design and Access Statement (DAS) - Images of proposed development from northeast and northwest

Figure 2 – Site photograph showing area between closest properties on Maple Road and southern boundary of the site

Figure 3 – Extract from the submitted Landscape and Visual Impact Assessment (LVIA) - Photomontage of visual impact on Maple Road looking north taken

Figure 4 – Site photograph from location of proposed MBF looking south towards eastern boundary with CRC and southern boundary tree belt

Figure 5 – Site photograph of existing bulking bays looking south

Figure 6 – Site photograph of Thames Water’s triangular piece of land looking south
BACKGROUND

Site Description

1 Earlswood Depot is located within the Metropolitan Green Belt approximately 2km south of Redhill and approximately 3km south east of Reigate, with properties in South Earlswood immediately to the south. The site is bounded to the east by the A23, Horley Road, with allotment gardens and a football ground immediately beyond this, with the London Victoria to Gatwick Airport railway line behind this. To the north of the site lies Reigate and Banstead Borough Council’s Depot with Earlswood Common beyond this. Earlswood Common is a Local Nature Reserve (LNR) and also a Site of Nature Conservation Interest (SNCI). The Thames Water-operated Earlswood Sewage Treatment Works lies to the west of the site with open land beyond.

2 The centre of the application site contains an operational Reigate & Banstead Borough Council (RBBC) municipal depot. The northern part of the site contains RBBC’s offices, and depot services for RBBC’s Parks, Highways & Neighbourhood services, and accessed from the A23. The depot also includes a vehicle servicing facility (predominantly used to MOT and service the area’s local taxi fleet) and overnight parking provision for the RBBC’s fleet of Refuse Collection Vehicles (RCVs). The centre of the site is surfaced with concrete hardstanding used for Community Recycling Centre (CRC) container transfer, with a number of temporary structures.

3 In the south west of the site (the area on which the proposed new Material Bulking Facility would be situated), the land is open and covered with scrub, and is banked in part to support the retaining walls of a new CRC to the east. Part of this open area has been landscaped with trees and shrubs in accordance with the requirements of the planning permission for the CRC to the east, with the CRC having its own access from the A23. To the south of the application site, lie the closest residential dwellings at 41-46 Maple Road, with trees on the site’s southern boundary.

Planning History

4 Planning permission for the civic amenity operations was originally granted (Ref: RE80P/285) in 1980. In 1992 consent was granted (Ref: RE92/0207) to redevelop the site including land to the south as a Refuse Transfer Station, Civic Amenity Site and Recycling Centre, but this has not been implemented. A Materials Recovery Facility was permitted on that land to the south in July 1998 (Ref: RE98/0082) but the permission was not implemented and has now lapsed. In July 1998 planning permission was granted for two applications – the continued use of land for the deposit and temporary storage of glass cullet (broken glass suitable for re-melting) in three bays (Ref: RE98/0567); and for the continued use of land as a civic amenity site (Ref: RE98/0568). The construction of four covered bays for receipt and temporary storage of recycled materials was granted planning permission (Ref: RE02/1340) in December 2002.

5 Planning permission (Ref: RE06/2004) was granted in January 2007 to re-design the layout of the CRC site to provide a split-level recycling facility to improve recycling provision and waste separation at the site by expanding the existing site. The planning permission made provision to expand the site both southwards and south westwards from the existing operational area to increase the total site area to 2.05 hectares. On 29 April 2008 planning permission was granted for the application for non-compliance with conditions 2 and 10 of planning permission (Ref: RE06/2004) Dated 12 January 2007 to allow for a revised layout of the site (Ref: RE08/0253). Further applications for approval of details were then submitted from 2008 – 2010, pursuant / relating to Conditions 2, 3, 5, 6, 7, 8, 12 & 13 of planning permission ref RE08/0253. On 14 March 2010, planning permission (RE10/00439) was granted to extend the opening hours of the CRC without compliance with Condition 3 of RE08/0253. Most recently, planning permission was
granted (RE10/0147) on 21 April 2010 for the erection of five metal poles for the installation of camera systems and LED signs.

THE PROPOSAL

6 The proposed development of a Materials Bulking Facility (MBF) for bulking, storage and transfer of MSW, including food waste and dry recyclables collected from Reigate & Banstead Borough Council (RBBC) and Tandridge District Council (TDC). The proposed development includes the demolition of four existing waste bays on site and the erection of new welfare/fleet administration and ancillary infrastructure. The proposed scheme intends to improve the overall provision of waste services to meet the requirements of the updated kerbside collection regimes of RBBC and TDC through the partial upgrade of existing facilities and the provision of a MBF. The proposed development would comprise the following key components:-

- An enclosed MBF with the capacity to receive approximately 110,000tpa of waste material;
- A SITA Welfare & Administration building which adjoins the MBF;
- A new welfare/administration building and associated parking provision for RBBC personnel;
- Two weighbridges and office;
- A water tank to harvest rainwater which may be used for fire fighting purposes;
- Improved parking facilities for RBBC Refuse Collection Vehicles (RCVs) and fleet vehicles associated with the depot's existing operations;
- External bulking bays including an area for the safe containment of materials including street sweepings and green waste collected from non domestic parks and gardens;
- A furniture reuse store;
- Improvements to access and the site’s internal road layout (including a traffic light system located at the ‘pinch point’ north of the site);
- Site fencing and landscaping around the perimeter of the site;
- Upgrade of utilities including the installation of a separate surface water management system and renewal of the external lighting system.

Access and Road Layout

7 The Depot’s existing entrance is located north of the application area, off of the A23 and would be used to gain access to the MBF via an internal road. The entrance would be shared by RCVs and personnel employed by RBBC and would remain entirely separate from the CRC entrance to the south. A secondary access point would be provided from the CRC entrance the south of the site (fleet parking area) however this would be for emergency access only in the event the main entrance is blocked. The internal road layout is designed to maximise site safety by installing new weighbridges further into the site itself. This would ensure that vehicles departing from the depot and approaching the site access junction with the A23 would be able to do so without obstruction from other vehicles waiting to use the weighbridge (i.e. the ‘pinch point’ that currently exists as vehicles first enter the site from the A23 access). This would enable incoming and outgoing vehicles to drive through the pinch point without the risk of collision or conflict from oncoming vehicles.
Materials Bulking Facility (MBF)

8 The proposed MBF would receive and sort up approximately 110,000tpa of MSW, including food waste and dry recyclates, which is based on forecasted collection figures provided by the Waste Collection Authorities (RBBC and TDC). The MBF would be located within the south western area of the site on land currently occupied by scrub and trees. The main MBF structure would be constructed using a steel portal framed shed. Ancillary structures which adjoin the main frame such as the welfare & accommodation office, plant room, acoustic tunnel along the southern elevation and loading tunnel on the western elevation would be clad with horizontally orientated open timber.

9 There would be along the MBF’s northern, southern and western elevations to enable vehicular access in and around the building. An inbound weighbridge along the eastern side of the main building would be provided for weighing all RCVs and HGVs entering the site and an outbound weighbridge would be provided to the north of the building for vehicles leaving the site. The dimensions of the main building would be 65.9m x 38.5m, with an approximate footprint of 2538m². To allow the safe deposit of materials from RCVs and bulker vehicles it would be constructed to a height of 10m at the eaves and 12m at the ridge. The main structure of the building is adjoined by other features including: (a) an acoustic tunnel along the building’s southern elevation (b) a loading tunnel along the building’s western elevation; (c) a plant room on the northern elevation; (d) SITA welfare & accommodation building along the MBFs northern elevation.

10 The acoustic tunnel along the southern elevation is a purpose built feature designed to contain any noise generated from vehicular movements and internal operations away from sensitive receptors to the south of the site. The entry and exit to the tunnel would both face north to the eastern and western sides of the building respectively. A loading tunnel to the west is designed to divert noise away from the southern area of the site while bulker HGVs are loaded with recyclate or residual waste. A roller shutter door would be fitted on the southern elevation of the loading tunnel which would be closed while a lorry is being loaded. The shutter door would remain closed during operational hours and would only open to enable bulker HGVs into position. The dimensions of the tunnel are 21.4m x 4.8m, with a footprint of 102.7m².

11 The plant room would store electrical equipment associated with the operation of the MBF and would be clad using trapezoidal cladding. The SITA welfare building would be a two storey building providing personnel employed by SITA with an office, lobby, toilets and shower, and mess facilities. The building would be clad using horizontally orientated rainscreen closed timber cladding. The dimensions of the SITA welfare office are 4.3m x 13.6m, with an approximate footprint of 58.5m². A swept path analysis has been undertaken to ascertain the dimensions of the loading tunnel, acoustic enclosure and internal layout of the MBF to ensure the safe manoeuvre of vehicles.

12 The internal layout of the building would comprise a number of bays allocated for different waste streams. The internal floor area provides space for up to 18 bays at a nominal 10m x 6m. The internal floor area of the MBF would be sloped at a slight gradient to enable any leachate/wash down water from waste material to drain into a dedicated drainage system before being discharged into the foul sewer for treatment (subject to an appropriate trade effluent discharge consent). The loading tunnel with have a 12m wide hatchway and would provide space for mobile plant such as a loading shovel to lift bulked material onto a bulker lorry. To assist in the loading of the lorry the loading tunnel would be at sloped at a gradient below ground level.

13 The operations within the MBF would comprise: the deposit of waste material into the appropriate bay; the use of mobile plant to move recyclate or waste materials within the building; and loading of material onto bulker HGVs for transportation off site to the appropriate location for re-use or recovery.
The RCVs using the site are twin bodied vehicles (‘twin packs’) carrying recyclates in one half and MSW (residual/food) in the other. Once a RCV has deposited its material in an appropriate bay within the building, the vehicle would exit the MBF via the doorway located along the building’s northern elevation and again drive around to the inbound weighbridge on the eastern side of the building to be reweighed before re-entering the building to off load the remaining material. The RCV then leaves the building through the northern door and move to the outbound weighbridge for final weighing. The RCVs would then leave the site to undertake further collection rounds or finish for the day. In the case of the RBBC RCVs, at the end of the day these vehicles would park up in the fleet parking area. TDC RCVs park off site. The deposited material would be moved using mobile plant (loading shovel) within the building for storage or for loading into heavy bulk vehicles.

Similarly to the RCVs, heavy bulk vehicles would enter the site from the same access point to the MBF in the south of the site. Vehicles would pass over the weighbridge used by the RCVs, drive though the acoustic tunnel (bypassing the building’s entrance), and enter and park within the loading tunnel located along the western elevation of the MBF. The loading tunnel would be lowered at a gentle gradient 1m below ground level to assist the loading of vehicles. As stated above, a roller shutter door would be provided at the entry and exit end of the tunnel. The door would open to let a vehicle enter and then close prior to loading. An opening to the inside of the building from within the tunnel allows the loading shovel to load material into the vehicle. Once loading has been completed the exit door is opened and the vehicle exits the tunnel and moves to the north of the building where it temporarily parks to be sheeted prior to moving to the outbound weighbridge. The vehicle is again weighed before leaving the site. The materials are transported to reprocessing facilities for treatment or final disposal.

A new welfare building is also proposed in the central section of the site for personnel employed by RBBC. The building would be located adjacent to RBBC’s fleet parking area, on land currently occupied by four bulking bays. The Welfare Building would be a footprint of 222m² (20m x 11m) and comprise a single storey structure with a pitched roof, 3.8m at the eaves to 5m at the ridge. Personnel may enter the building using the single door situated along the buildings north elevation. Car parking spaces including one accessible space would be allocated to the east and north of the building.

As stated above an inbound weighbridge would be provided alongside the eastern side of the MBF and an outbound weighbridge to the north of the building. A weighbridge office is proposed within the central section of the site immediately adjacent to the external bulking bays alongside the outbound weighbridge. The weighbridges would be of a standard specification, with a ramp and single deck approximately 18m x 3m in dimension. The weighbridge office would be raised to 1.35m above floor level and comprise a single storey building 4.5m in height with an approximate footprint of 33.6m² (3.5m x 9.6m). A kitchen area and accessible toilet would be provided within the building however its predominant use would be an office used by personnel from SITA Surrey to keep a record of all incoming and outgoing vehicles and ensure all necessary paperwork is complete.
Existing and Proposed Operational Hours

18 The site’s current operational hours are: Monday to Friday 06:00 – 18:30; Saturdays and Sundays 06:00 – 14:00 and Bank Holidays 06:00 – 18:30. The proposed opening hours are identical to the above with the exception that no opening of the MBF is proposed on Sundays. RBBC’s RCVs and fleet vehicles generally leave the site from 05:30 onwards. The opening hours for the CRC adjacent to the site are:-

- During Winter (1 October – 31 March):
  - Monday to Friday 08:00 – 16:15
  - Saturdays 09:00 – 16:15
  - Sundays and Bank Holidays 09:00 -16:15
  - Closed on Christmas day, Boxing Day and New Years

- During Summer (1 April – 30 September):
  - Monday to Friday 08:00 – 17:15
  - Saturdays 09:00 – 16:45
  - Sundays and Bank Holidays 09:00 -16:45
  - (Includes site closure hours plus 30 minutes for tidying activities)

19 The proposed operational hours for the MBF are: Monday to Friday 06:00 – 18:30; Saturdays 06:00 – 14:00; and Bank/Public Holidays 06:00 – 18:30 .

20 The applicant sets out that the site’s existing peak operational hours are considered to be 06:00-07:00hrs and 13:00 to 14:00hrs when RCVs and fleet vehicles make their first and last visits of the day. The level of activity during the weekends and Bank Holidays would vary to a lesser degree in comparison with daily activities during the week. Waste collections do not normally take place on Saturdays therefore activity would mainly be limited to sorting and bulking material within the MBF building in preparation for its transportation off site. RBBC currently collect MSW on Bank Holidays and seek to continue this in future. TDC do not normally collect MSW on Bank Holidays as they typically collect waste between Tuesdays and Fridays each week and the majority of bank holidays occur on Mondays. Therefore, the activity undertaken at the site on Monday Bank Holidays in future would only relate to RBBC vehicles which already tip at the site on these occasions.

Employment

21 The facility currently employees approximately 40 full time equivalent office staff as well as fleet vehicle drivers. The existing operations at the depot would remain therefore all current employment positions would be retained. During construction it is envisaged a minimum of 15 individuals would be working on site at any one time. This number would fluctuate depending on the activity. Additional employees would be required to manage and operate the proposed MBF. This would comprise approximately 9 operational staff as follows: 1x Manager; 1x Supervisor; 2x Weighbridge operators; 2x Machine operators; and 3x Banksman/operatives.

Fleet Parking

22 Existing fleet parking is present on land east of the site area, in between the RBBC offices/workshop building and an area of concrete hardstanding used for CRC container transfer. The provision of fleet parking would be enlarged by including the area of concrete hardstanding adjacent to the existing fleet parking. The proposed fleet parking would occupy an area of approximately 3,200m² and provide parking for 116 HGVs/LGVs and fleet vans. The fleet parking area would be used for overnight parking of RCVs associated with the proposed development. This area would be resurfaced with tarmac, white line marked and fully integrated into the site’s surface water management system via an interceptor. The perimeter of the area would be kerbed to ensure surface water runoff is
efficiently drained into the water management system. Additional lighting would be provided to the same or improved specification as the existing lighting system.

**External Bulking Bays and Hardstanding areas**

23 An area of land north of the proposed MBF is currently owned by Thames Water and would be developed to include four covered bulking bays and an area of hardstanding allocated for 'ISO' shipping containers. The covered bays would be used to store green waste and street sweepings. The external bulking bays comprise a permanent three sided structure, 10m high with 312m² footprint (12m x 26m), constructed from concrete panels and steel clad roof. These bays would be suitably integrated into the sites foul water management system, discharging any leachate from the rear of each bay into the sewer system for treatment. Vehicles using the bays would follow the same routing system described above and would use the inbound and outbound weighbridges. Heavy bulk vehicles would be used to collect materials which would also be loaded by a loading shovel. The adjacent containers would be used to store re-useable/recyclable items including textiles and whites goods. Surface water runoff deriving from the area of hardstanding and ISO containers would be drained into the surface water management system. Figure 5 attached to this report shows the site's existing bulking bays.

24 A furniture store would also be provided adjacent to the sites ground maintenance and tractor parking for the storage of recycled furniture. The building would comprise a simple structure with a footprint of 36m² (6m x 6m) and 3.6m high.

**Ancillary Infrastructure**

25 Concrete hardstanding would be used to surface the MBF, areas in and around the external bulking area and other areas ancillary to the development. All new roadways and the fleet parking area would be surfaced using tarmac. Security fencing is present around much of the site's perimeter with the exception of the eastern boundary where land is yet to be acquired from Thames Water. Additional fencing would be positioned around the southern and western perimeter of the site and within the central area of the site to segregate waste management activities south of the site from RBBC depot operations. Security gates would be provided at the entrance to this area which would be locked outside operational hours. Fencing would be installed along the eastern perimeter of the site.

**Landscaping**

26 An area south of the proposed MBF is occupied by various native and non-native trees which would be retained and added to for the purpose of screening the development from residential properties located to the south of the site. The site’s existing landscaping has been considered within the applicant’s Landscape and Visual Impact Assessment (LVIA) and the proposed inclusion of native tree and shrub species are identified within submitted drawings. A photomontage of this southern boundary showing the MBF in place is attached as Figure 3.

**Lighting**

27 New external lighting would be installed to ensure the safety of manoeuvring vehicles and provide security for site operatives. The key areas where lighting would be implemented include: Roadways, the fleet car park, weighbridges and other vehicle manoeuvring areas; and above doorways and along building facades.
CONSULTATIONS AND PUBLICITY

Borough Council

28 Reigate & Banstead Borough Council:

“Whilst no objections are raised, the County are requested to give careful consideration to the following when determining the application:

1. The highway safety, traffic and access implications;
2. The need for measures to control odour and noise;
3. The need to consider the cumulative impact of developments on air quality; and
4. The need for a landscaping solution to help screen the development.”

29 Environmental Health (Reigate & Banstead Borough Council): No specific contaminated land concerns based on the findings of the reports for the sites proposed usage. No significant or site wide contamination was identified, with the exception of Asbestos Containing Materials (ACMs).

Consultees (Statutory and Non-Statutory)

30 (adjoining authority) Tandridge District Council: “No comments to make on the proposed development”

31 County Highway Authority: No objection subject to the following conditions:

1. The visibility zones at the vehicular / pedestrian / cycle access to Horley Road shall be kept permanently clear of any obstruction over 1.05m high.

2. Space shall be laid out within the development hereby approved in accordance with the approved plans for vehicles to be parked, for the loading and unloading of vehicles and for all vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking, loading and unloading & turning areas shall be retained and maintained for their designated purposes.

3. No development shall commence until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development. The Construction Environmental Management Plan shall include details of:

   (a) parking for vehicles of site personnel, operatives and visitors;
   (b) loading and unloading of plant and materials;
   (c) storage of plant and materials;
   (d) programme of works (including measures for traffic management);
   (e) HGV deliveries and hours of operation;
   (f) vehicle routing;
   (g) measures to prevent the deposit of materials on the highway;
   (h) measures to prevent dust; and
   (i) measures to prevent noise.

4. The proposed Materials Bulking Facility shall not be operational unless and until the Staff Travel Statement and its measures have been implemented. The travel statement shall be permanently maintained and regularly updated.

32 Highways Agency: No objection.
33 County Landscape Officer: No objection subject to the following points of consideration relating to the use of conditions:

“If Management Plan

I note a Landscape and Ecology Management Plan (LEMP) is provided as part of the LVIA at Appendix D and if SCC are minded to approve this application, this should be secured by condition along with the landscape scheme EWT03 with suitable revisions. Planting Specification and Schedules at Appendix C, should also be included.

The documents are comprehensive but intended for implementation of the landscape contract and are not directed at the Planning Authority. The LEMP and/or Planting Schedule should be supplemented by a matrix indicating when all site operations are to be carried out month by month for the first calendar year, and any monthly timings of cyclical operations such as pollarding or selective thinning, for clarity and certainty for the Planning Authority. This will need to be reviewed annually and rolled forward over the first 5 years. The review period can then reduce to every 5 years as already suggested in the LEMP. It is not entirely clear for what period the LEMP is for, but I would suggest a minimum of 20 years. This will cover the period of establishment necessary for the trees to achieve some substance, in order to provide the mitigation proposed. In addition the area of Tree Group G1 to be retained, should be secured by condition.

Replacement Planting

The LEMP should include timings for inspection for failed growth and replacement planting which should occur year on year for first 5 years. Replacement of any failures in the specimen tree planting will need to extend for the life of the LEMP, alongside a commitment to replant any major tree failures in the retained area of tree group G1. This is required in view of the critical role this area of existing and new planting plays in the long term mitigation for this development.”

34 County Environmental Assessment: The proposal would not constitute EIA development.

35 County Noise Consultant (CNC): No objection subject to the following conditions:

Site attributable noise levels shall not exceed 40 LAeq for the period 0600 – 0730 Monday – Friday and before 0800 Saturdays and Bank Holidays, and shall not exceed 52 LAeq for the remainder of daytime operational period, when measured at, or recalculated as at, 3.5m from the facade of any noise sensitive property at a height equivalent to a bedroom window up to 0730, and 1.5m during the daytime operational period.

The level of noise emitted from the site during construction shall not exceed 70 LAeq during any 30 minute period between 0800 to 1800 hours Monday to Friday and 0900 to 1300 hours on a Saturday measured at, or recalculated as at, a height of 1.2 m above ground level and 3.5 m from the facade of any residential property or other noise sensitive building that faces the site.

Construction hours/days shall be only: Monday to Friday: 8am-6pm, Saturday: 9am-1pm, with no working on Sundays or Bank/Public Holidays.

There shall be no glass handled outside the Materials Bulking Facility before 0730 Monday-Friday or 0800 on Saturdays and Bank/Public Holidays.
36 County Lighting Consultant:

In terms of lighting, information submitted is sufficient to assess the proposed new lighting, however it contains no information of impacts from relocated equipment or for the effects caused from the existing lighting that remains. Details need to be supplied for the cumulative effects. From the information submitted the new lighting complies with recommendations, however it doesn’t include information for the relocated Gemma LED lighting.

Suggested conditions

- The applicant is to provide calculation results to evidence all new and relocated lighting (i.e. existing units moved to positions C(1) to C(5)) conform to recommendations for environmental zone E2 in the ILP document “Guidance Notes for the Reduction of Obtrusive Light GN01:2011” prior to commencement of construction.

- No external lighting shall operate between the hours of 10pm and 6am.

- At any time during the first 12 months of operation, the Council shall be entitled to require the applicant to adjust or shield any light source that fails to conform to recommendations for environmental zone E2 in the ILP document “Guidance Notes for the Reduction of Obtrusive Light GN01:2011.

37 County Air Quality Consultant (CAQC): No objection subject to the securing of a pre-commencement Dust & Odour Management Plan to include (but not limited to):

- Keeping the bulk loading bay doors shut – this bay is used infrequently compared to the RCV entry and exit and thus there should be no operational impediment caused by keeping the doors shut;

- Automatic weather station being installed on site and how this data will be used and reported;

- All operations apart from within the external green waste loading bays to be carried out within the building; and

- No waste to be stored outside apart from green waste in the external bays, however green waste will not be stored for longer than 72 hours.

38 Environment Agency: No objection.

39 County Ecology Officer: No objection.

40 County Geotechnical Consultant: No objection subject to following conditions:

1. **Submission of Remediation and / or Mitigation Scheme**

A detailed remediation and / or mitigation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared, and shall be subject to the approval in writing of the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
2. **Implementation of Approved Remediation and / or Mitigation Scheme**

The approved remediation and / or mitigation scheme shall be carried out in accordance with its terms prior to the commencement of any development, other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out shall be produced, and is subject to the approval in writing of the Local Planning Authority.

3. **Reporting of Unexpected Contamination**

In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, including:

i) a survey of the extent, scale and nature of the contamination;
ii) an assessment of the potential risks to previously identified receptors, and;
iii) an appraisal of remedial and mitigation options, and proposal of the appropriate risk option(s).

In accordance with DEFRA and Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11.'

Where remediation or mitigation is necessary to bring the ground to a condition suitable for the intended use or suitably reduce the risks to identified receptors (for example, human health), a detailed scheme, shall be submitted to the Local Planning Authority to ensure that the site will not quality as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. This shall include the scope of works to be undertaken, timetable of works, objectives, site management procedures and remediation criteria.

Following completion of measures identified in the approved remediation scheme for the unexpected contamination, a verification report shall be prepared, which is subject to the approval in writing of the Local Planning Authority.

4. **Long Term Monitoring and Maintenance**

A monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed ground gas protection measures shall be subject to approval in writing of the Local Planning Authority. Following completion of the measures identified in that scheme and following one year post-completion of development, an assessment of the long-term effectiveness of the proposed ground gas protection measures shall be prepared, including a review of the results of long-term monitoring and submitted to the Local Planning Authority.

41 Natural England: No objection.

42 Surrey Wildlife Trust: No objection subject to the applicant being required to undertake all the recommended Mitigation/Compensation actions in their submitted reports, including biodiversity enhancements.

43 Thames Water: No objection subject to informatives.

44 Health and Safety Executive: HSE does not advise, on safety grounds, against the granting of planning permission in this case.
Gatwick Airport Safeguarding:

“The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

Submission of a Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

Management of any flat/shallow pitched roofs and ledges on buildings within the site which may be attractive to nesting, roosting and “loafing” birds. The management plan shall comply with Advice Note 8 ‘Potential Bird Hazards from Building Design’ attached.

The Bird Hazard Management Plan shall be implemented as approved, upon completion of the roofs and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.”

County Archaeological Officer: No objection or need for further archaeological works.

Parish/Town Council and Amenity Groups

Salfords & Sidlow Parish Council:

“The comments from County Highways on the Three Arch Road/A23 Junction are grossly inconsistent. For Redhill Aerodrome, this junction is ‘is shown to already be operating close to or above its capacity.’ and a sizeable financial contribution is required towards junction improvements. For Britaniaest where no increase in throughput is proposed this junction is ‘already operating at or near capacity’. Yet for the proposed Earlswood depot where an increase in HGV traffic is shown no further analysis is required.

It is acknowledged that the proposed development would lead to increased HGV traffic on the Three Arch Road/A23 Brighton Road junction. This junction is already assessed by SCC Highways to be operating near, at or above at capacity and as the main access to the East Surrey Hospital, this junction is critical.

Regarding the application by Redhill Aerodrome for a hard runway SCC Highways proposed section 106 agreement says ‘Three Arch Road/A23 Junction - Without the expansion of the Aerodrome the junction is shown to already be operating close to or above its capacity. The additional trip generation from the development will exacerbate the situation. A contribution of £141,541 towards junction improvements at the Three Arch Road/A23 and Mid Street/A25 junctions is required.’

In commenting on a recent application from Britaniaest which stated ‘The application will not generate any additional waste imports’. The SCC Planning Officer report says ‘The County Highway Authority consider that It has not yet been adequately demonstrated that the residual cumulative transportation impact of the proposed additional operational throughput is not severe given that application site is the main generator of Heavy Goods Vehicle traffic on this stretch of the A217 and that several junctions, including the A217 Woodhatch junction and the A23 Three Arch Road junction, on the potential access routes
to the site are already operating at or near capacity, and therefore the proposal does not accord with the National Planning Policy Framework 2012.’

While the Britaniacrest application calculates the traffic associated with their Environment Agency permit of 250,000 tpa of waste it states it ‘seeks to improve the recycling operation of the existing site and will not generate any additional waste imports. The site will also continue to employ 60 members of staff.’

The proposed Earlswood development would take in the waste from Reigate & Banstead which now goes to Britaniacrest and it would add the waste from Tandridge. Callidus assess an increase of 11 HGV movements per day through the A23/Three Arch Road junction and state that ‘On the basis of the above, it has been agreed with SCC’s Highways Officer that the Three Arch junction does not need to be analysed further.’

The statement in 4.1.5 of the Callidus Transport Assessment fails to recognise that not all of the trucks can carry a full day’s load, at least some of the trucks have to empty their load during the day and then go out and back again some of which will increase the traffic through the A23/Three Arch Road junction so the claimed benefit of being based at Earlswood is limited.

The addition of all of the waste from Tandridge by trucks, which are not based at Earlswood, and the fact that at least some trucks have to make more than one trip per day makes the increase of 11 HGV movements per day highly questionable. However, even that number has been considered unacceptable for applications from Redhill Aerodrome and Britaniacrest so should be treated as unacceptable for the application to develop the Earlswood site.”

50 Reigate Society: No response.

Summary of Publicity Undertaken and Key Issues Raised by Public

51 The application was publicised by the posting of 2 site notices and 854 owner/occupiers of neighbouring properties were directly notified by letter. The County Planning Authority has received 19 representations in response to this application; the main points raised are set out below:-

Green Belt / Visual impact

• Harm to Green Belt/countryside
• Alternative location/proposal preferred, better suited to industrial area of Salfords
• Overdevelopment
• Poor design
• The new industrial building will be clearly seen from the roadside and will impact on the aesthetic appearance of the area.
• The new building will block views of St John’s Church spire and use of timber will not disguise such an incongruous large building
• This is a huge industrial development on Green Belt with no very special circumstances
• The layout needs to be reconfigured because it will dominate the properties on Maple Road, being only 30 metres away and 13 metres high.
• Silver-coloured cladding will be incongruous and should be a colour that blends in
• A deep conifer screen should be planted on the southern boundary ASAP

Need / Waste Management

• The development will not provide any additional processing of recyclables just purely store and stockpile material to be bulked to different end-destinations. The exact same process is already being carried out for the waste in a local established privately funded facility. Therefore no need.

• Why can’t waste be taken direct to processing rather than to the depot for forwarding Tandridge’s waste will add to deliveries

• R&B should consider need for local waste disposal for small businesses who now have to travel to Leatherhead or Epsom to dispose of C&I waste

• To what extent this project will be funded by the local council, what will the annual running costs to the taxpayer be? We have urgent needs in the local area for additional funding into hospitals, education and housing? How can this spend on another recycling facility within the area be justified?

• The application states that the 'privately owned facilities in the area are limited', which is untrue, as the waste is currently going to an established local facility.

• The application claims that RBBC would like to reduce the 'reliance on contracts with commercial partners' yet they will be partnering with SITA Surrey - a commercial partner, to manage the site.

Traffic & Congestion

• Increase in traffic and congestion

• Potential damage to homes from heavy traffic increase

• Depot traffic should be banned from Maple Road, Hanworth Road and Tolgate Avenue to just use Woodhatch Road linking to the A23 or Maple Road should be completely resurfaced to allow use by HGVs

• How could increasing the traffic with 102 additional HGV movements per day via the Three Arch Road/A23 busy junction be justified?

• The application states that the large 'Bulker' articulated HGVs will increase from 3 per day visiting site to 20, with peak traffic hours of 07.00 and 18.30 and this means the vehicles movements of these huge lorries will go from 6 per day to 40 per day

• The application states that not only will there be an additional 8 RCV vehicles in for Reigate and Banstead but a further 23 for Tandridge Council's waste and that is another 62 HGV movements per day - it is proposed in the application that the RCV movements will be between 05.00 and 06.00.

• The Three Arch Road/A23 junction has recently been assessed by County Highways in other planning applications and is 'already operating at or near capacity' and that 'the junction is shown to already be operating close or above its capacity' 'as the main access to the East Surrey Hospital'. Yet in the applicant states that due to re-routing only 11 additional HGV movements per day will go through the junction and therefore 'the Three Arch Junction does not need to be analysed further.'
• The Transport Assessment states that the additional trips generated by the depot are significantly smaller than the peaks in general traffic. However this lacks real consideration for delays to ambulances and local people traveling to the junction to access the Hospital from the North past the depots entrance with the increased HGV movements, especially if the lorries are queuing

• Traffic queuing on the A23 causes a major concern for emergency vehicles and people travelling to East Surrey Hospital via the main access (Three Arch ways Junction) with potentially disastrous consequences.

• The Traffic Assessment identifies 'Re-routing' the traffic from the North as a reason that traffic will be directed away from the Three Arch Junction. However is this not equally as hazardous?

Highway Safety

• The site access is inadequate and should be widened given the blind hill just north

• Hazard to highway safety, particularly from pedestrians crossing the A23 with more HGVs and the blind hill just north; a fatality is imminent

• What will become of our local recreation facilities if the road is just too dangerous to cross to get to them?

Amenity Impacts

• Noise, disturbance and pollution from construction and operation, including more HGVs using local roads

• Large vehicles will run close to the southern boundary and skips will get dragged on the ground as happens at the nearby CRC

• Noise from vehicles at the early operational times of 5am-6am

• Extra HGVs will create more air pollution

• Smell from site and adjacent sewage works gets worse annually, this needs to be addressed

• Will steps be taken to control additional smells and vermin?

• Even on a cold day the smell at SITA’s Leatherhead site is unpleasant, how will this site be controlled?

• No vehicle movements should be allowed before 6am and no activity before 7am

• No guarantees that HGVs won’t use Maple Road

• The reality is that the MBF doors will be left open more than is stated meaning increase in odour and the mist air suppression system will be ineffective because of this

• Who and how is it decided that ‘malodorous’ waste will be removed?

• The building of a tunnel will be inadequate to mitigate noise from vehicle movements and operations
Other Issues

- Property devaluation
- Eastern border (footpath) of site with A23 is in disrepair which doesn’t inspire confidence in redevelopment
- Harm to conservation area
- Inadequate parking
- Inconvenience during construction, including traffic congestion into the CRC
- Sewage/drainage capacity

PLANNING CONSIDERATIONS

52 In determining the application the County Council should have regard to any relevant European and National policy, the National Planning Policy Framework (NPPF), Government Circulars and any other material considerations, which could include emerging development plan policy documents.

53 The National Planning Policy Framework (NPPF) and Technical Guidance relating to Flooding was adopted in March 2012. This document provides guidance on to local planning authorities in producing local plans and in making decision on planning application. The NPPF is intended to make the planning system less complex and more accessible by summarising national guidance which replaces numerous planning policy statements and guidance notes, circulars and various letters to Chief Planning Officers. The document is based on the principle of the planning system making an important contribution to sustainable development, which is seen as achieving positive growth that strikes a balance between economic, social and environmental factors. The Development Plan remains the cornerstone of the planning system. Planning applications which comply with an up to date Development Plan should be approved. Refusal should only be on the basis of conflict with the Development Plan and other material considerations.

54 Planning Policy Statement 10 (PPS10) Planning for Sustainable Waste Management remains in place and in time will be replaced by national waste planning policy published as part of the National Waste Management Plan. A draft Updated National Waste Planning Policy was published for consultation on 29 July 2013. If unchanged and passed by central Government it will supersede part of the wording of policy CW6 (Green Belt) of the current Surrey Waste Plan 2008. Owing to the fact that the Updated National Waste Planning Policy is still in draft form at the time of writing this report, Officers have assessed the development against an unchanged Surrey Waste Plan 2008 Policy CW6. The material change proposed via the draft Update is as follows:

“To reflect this approach, the updated policy removes the former reference in policy that waste planning authorities should give significant weight towards locational needs and wider environmental and economic benefits when considering waste planning applications in the Green Belt. This means that, under national planning policy, these planning considerations should not be given more significant weight compared to others when planning applications are decided for waste facilities in the Green Belt. Applications for facilities located in the Green Belt will still need to be considered by waste planning authorities on their individual planning merits having regard to the waste planning authority..."
local waste plan and other material considerations, with the weight to be given on particular planning considerations being for the decision maker, subject to the circumstances of each particular case.”

PLANNING & WASTE MANAGEMENT ISSUES

Surrey Waste Plan 2008
Policy CW4 Waste Management Capacity
Policy CW5 Location of Waste Facilities
Policy CW6 Development in the Green Belt
Policy WD1 Civic Amenity Sites
Policy WD2 Recycling, Storage, Transfer, Materials Recovery and Processing Facilities (Excluding Thermal Treatment)
Policy DC3 General Considerations

55 Surrey Waste Plan 2008 (SWP 2008) Policy CW4 (Waste Management Capacity) states that planning permissions will be granted to enable sufficient waste management capacity to be provided to manage the equivalent of waste arising in Surrey with a contribution to meeting the declining landfill needs of residual wastes arising in and exported from London; and to achieve the regional targets for recycling, recovery and diversion from landfill by ensuring a range of facilities is permitted.

56 SWP 2008 Core Strategy policies establish sequential principles for the location of waste management facilities and an approach for development in the Green Belt. Policy CW5 (Location of Waste Facilities) sets out as follows principles for considering the location of waste facilities when allocating sites in development plan documents or considering proposals on unallocated sites:

“(i) priority will be given to industrial / employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network;

(ii) priority will be given over greenfield land to previously developed land, contaminated, derelict or disturbed land, redundant agricultural buildings and their curtilages, mineral workings and land in waste management use;

(iii) Areas of Outstanding Natural Beauty, Areas of Great Landscape Value, and sites with or close to international and national nature conservation designations should be avoided; and

(iv) the larger the scale of development and traffic generation, the more important is a location well served by the strategic road network or accessible by alternative means of transport”

57 SWP 2008 Policy CW6 (Development in the Green Belt) “seeks to ensure that the Green Belt serves its proper purpose whilst making provision exceptionally for necessary waste management development” (Para. B44). The policy sets out four considerations, which may contribute to very special circumstances. These are:

- the lack of suitable non-Green Belt sites
- the need to find locations well related to the source of waste arisings;
- the characteristics of the site; and
- the wider environmental and economic benefits of sustainable waste management.
58 The Inspector’s conclusion in his report on the examination of the SWP commented that ‘reliance would have to be placed on the general factors of Policy CW6 to demonstrate very special circumstances in the Green Belt’. In practice, the County Planning Authority expect an ‘Alternative Site Assessment’ to be submitted, to demonstrate that there are no better sites available to the applicant. Such a demonstration is taken by the County Planning Authority to be a critical part of any very special circumstances case to support inappropriate waste development in the Green Belt even for proposals for sites allocated for such uses in the SWP 2008.

59 Policy WD2 (Recycling, Storage, Transfer, Materials Recovery and Processing Facilities (Excluding thermal Treatment)) identifies the locations where planning permission for development involving bulking up of waste and facilities for recycling, recovery and processing of waste will be granted. Land at Earlswood Depot is listed as a site where planning permission will be acceptable for this use provided the development proposed meets key development criteria and where very special circumstances can be demonstrated in accordance with the provisions of Policy CW6.

60 Land to the east at Earlswood Depot is allocated (on a site area of 2.12 hectares) in the SWP for use as a civic amenity site, a recycling, storage, transfer, materials recovery and processing facilities (Policies WD1 and WD2). The Key Development Criteria (KDC), which any development needs to address (but which are not exhaustive), are as follows:

- Access arrangements and traffic impacts: access into both sites requires improvement and the A23 Horley Road suffers from peak hour congestion, with a pinch point at the traffic lights south of the site. Proposed development of the site to the west of the sewage treatment works should consider linkages with the sewage treatment works and civic amenity facility to minimise traffic impact and overall traffic numbers. A transport impact assessment should be undertaken and submitted with any planning application.

- Green Belt: the site is located within the Green Belt and any proposal should seek to manage the impact of development on openness so as to minimise the harm to the Green Belt.

- Land to the south of the existing civic amenity site and at the western end of the sewage treatment works is considered to offer most opportunity for development of a waste management facility.

- Flood risk assessment required: flood mitigation measures may be required in connection with development of a new waste management facility.

61 Allocated sites also have to be assessed against SWP 2008 development control Policy DC3 (General Considerations). Policy DC3 requires that the County Council be satisfied that the impact of a proposed so that it does not significantly affect people, land, infrastructure and resources. It also requires planning applicants to show that they have assessed particular environment and amenity issues.

62 Paragraph B30 of the SWP 2008 states that Surrey County Council remains committed to achieving net self-sufficiency, enabling appropriate development that implements the waste hierarchy and ensuring the County delivers its contributions to regional waste management. Officers consider that the proposal must be viewed in the context of Surrey achieving net-self sufficiency and contributing to regional waste management. Additionally, Policy CW6 of the SWP 2008 states that ‘the wider environmental and economic benefits of sustainable waste management, including the need for a range of sites’ may contribute to very special circumstances.
Need Case Submitted

63 The applicant notes in the submitted Planning Statement (PS) that the majority of the application site is allocated in the Surrey Waste Local Plan (2008) for civic amenity site and recycling, storage, transfer, materials recovery and processing facilities (excluding thermal treatment). The principle of the use of the site for waste management use has therefore already been established through the site allocation process. The applicant acknowledges that part of the application site is outside the site allocation boundary, though they note that most of the waste management elements are located within the allocated site boundary. It is only the external bays and the reuse store that are waste management elements (amounting to an area of 0.152ha) which are not contained within the allocated site boundary (though Officers note that the SWP 2008 makes clear that allocated site boundaries are only indicative).

64 The PS sets out that the site’s allocation was based upon robust analysis and data which was gathered during the development and preparation of the Surrey Waste Plan 2008, specifically the Need Assessment which was undertaken by Babtie Group Ltd (on behalf of SCC) in 2003. The PS argues that in accordance with Paragraph 22 of PPS10, if a proposal is consistent with an up-to-date development plan, applicants for new or enhanced waste management facilities are not required to demonstrate a quantitative or market need for their proposal. The SWP, adopted in 2008, is the up-to-date planning policy document which plans for waste development over a 10 year timeframe up to 2018. As such, then applicant argues that a full need assessment is therefore not required for the purposes of this application, though as an alternative, a qualitative statement is provided as set out below.

65 The Babtie Need Assessment identified that 579,000 tonnes of municipal waste was produced in 2002/3 and based on stabilised growth projections this figure is anticipated to grow by 25% up to 2020. The assessment established four scenarios covering national, regional and local landfill diversion targets including a ‘do nothing’ scenario for comparison and a Babtie Scenario based on ambitious yet achievable targets. When applying the Babtie Scenario, 163,000 tonnes of MSW is required to be recycled by 2020. Taking into account existing recycling facilities (which were operational at the time of the assessment and recycled 79,000 tonnes) additional recycling facilities will be required to accommodate 84,000 tonnes of MSW waste. To manage the remaining tonnage approximately four small scale recycling facilities (with 25,000 tonnes per annum throughput) will need to be developed.

66 The PS sets out that the proposed development would assist in achieving recycling targets by ensuring recyclate such as glass, paper and plastic bottles from municipal waste streams are bulked and prepared for transportation and processing at a specific Materials Recycling Facility (MRF). When applying the Babtie Scenario, 163,000 tonnes of MSW is required to be composted by 2020. The proposed development would assist in meeting composting targets by ensuring feedstock such as food waste is bulked for transportation to an existing/proposed Composting or Anaerobic Digestion facility. When applying the Babtie Scenario, 217,000 tonnes of MSW is required to be recovered by 2020. The proposed development would assist in meeting composting targets by ensuring feedstock such as non-recyclable waste is bulked for transportation to an existing/proposed Energy from Waste (EfW) or gasification facility.
Waste Arisings and Capacity

The PS also sets out that data from the Surrey Waste Local Plan and Annual Monitoring Reports (AMR) identify the quantity of MSW which has been generated on an annual basis. The statistics indicate that from 04/05 to 07/08 small fluctuations in waste arisings were recorded and on average 618,586 tonnes per annum (tpa) of waste was generated over this three year timeframe. Waste arisings took a steep decline in 2008, with quantities of MSW reducing by 8.6%. The PS argues that this reduction could be reflective of the global recession which took hold in 2008 and that waste arisings continued to fall steadily between 2009 and 2011, possibly due to the sustained economic downturn and/or the successful implementation of waste reduction strategies. Waste arisings also fell from 2010/11 to 2011/12 at a marginal rate of 0.2%. The MSW arisings recorded in 2011/12 are 21.5% lower than the estimated tonnage of arisings identified within the South East RSS (now revoked). While this is a positive sign, the PS argues that waste management facilities are nonetheless required to accommodate future waste arisings and meet the stringent recycling and landfill diversion targets identified in national and local policies.

The applicant sets out that Surrey’s Annual Monitoring Report 2011-2012 (AMR 11/12) provides key data on Surrey’s waste arisings, trends and waste management capacity throughout 2011-12. The AMR 11/12 identifies that all MSW arisings in Surrey (545,890 tonnes) was treated in the following ways: 54% (294,357 tonnes) was reused, recycled or composted; 31% (169,445 tonnes) was recovered; and 15% (82,088 tonnes) was sent to landfill. In the same timeframe, planning permission was granted for various waste management facilities, amounting to a net additional capacity of 222,300 tonnes, including:

- Charlton Lane Eco-park comprising a 60,000tpa gasification facility, 40,000tpa Anaerobic Digestion (AD) facility and a recyclable materials bulking facility.
- Trumps Farm comprising 48,500 AD facility and 10,000 wood drying and pellet facility.
- Stanwell Quarry comprising a 82,500tpa aggregate recycling facility; and
- Improvements to three sewage treatment works, two CRCs and one end of life vehicle facility.

Taking the above developments into account, the PS sets out that a large proportion of Surrey’s MSW arisings are intended to be treated at these facilities. For example, waste which is recycled and recovered at Charlton Lane Eco-park would be mainly MSW derived from Surrey. The applicant identifies that they are currently applying to amend the planning permission for the Eco Park and that this would include reducing the throughput for the gasification facility to 55,000tpa. The AD at Trumps Farm would use a combination of MSW and Commercial and Industrial food waste as feedstock, whereas the recycling planning consent at Stanwell Quarry is an aggregate facility which would only process Construction and Demolition waste. It is therefore assumed in the PS that the permitted waste management facilities could treat up to 143,500tpa of MSW. The increase in waste management capacity delivered in 11/12 could therefore enable up to 27% of MSW arisings (recorded in 11/12) to be recycled or recovered and diverted from landfill. While this is a positive achievement, the PS argues that additional waste management capacity for MSW is still required if Surrey intends to achieve its ambitious targets (identified in the Surrey Waste Partnership Joint Municipal Waste Management Strategy 2010 (the Waste Management Strategy)) to recycle and re-use 70% of all MSW by 2013/14.
The PS also highlights that the AMR 11/12 identifies the total percentage of household waste sent for re-use, recycling or composting in each district over 2001/12. Figures identified that Tandridge DC had the lowest recycling rate of 33.6%, followed by RBBC at a rate of 37.8%. By comparison the highest rate of recycling was 65% achieved by Surrey Heath. PPS10 applies the ‘Proximity Principle’ whereby waste should generally be managed as near as possible to the place of production as the process of transporting waste itself has an environmental impact. The PS therefore argues that in light of the ‘Proximity Principle’, the low rates of recycling achieved by TDC and RBBC clearly illustrates the need to improve waste reuse and recycling capacity and facilities within these areas.

On the basis of RBBC and TDC’s agreed goal to reach 70% recycling, Officers note that this would require a doubling of the amount of recyclate collected. The development of the MBF at the site would reduce the amount of MSW currently sent to landfill / out of the County for treatment. In order to facilitate such an increase in recycling in RBBC and TDC, Officers acknowledge that adequate facilities should be available to handle this as close as possible to where the waste arises. On this basis, there is clearly a need for the new MBF at Earlswood Depot, which would assist in moving MSW up the waste hierarchy.

The proposed MBF would receive and sort up approximately 110,000 tpa of MSW, including food waste and dry recyclates, which is based on forecasted collection figures provided by the Waste Collection Authorities (RBBC and TDC). To allow for expected growth in the amount of material handled by the RBBC and TDC contracts, an increase in material collected from 98,535 tpa to 101,023 tpa was forecast by the County Waste Disposal Authority. However, the submitted Transport Assessment has considered the impact of the site receiving 110,000 tpa, which is the level of waste applied for in this case. On the basis of the applicant’s submitted justification, Officers note that the size of the proposed main MBF building arises principally from the operational space required within the structure (e.g. operational head-height and vehicle tracking/circulation space), as opposed to the additional tonnage of waste to be received.

The PS therefore argues that the proposed development of the MBF at Earlswood would assist in achieving and make a positive contribution to landfill diversion targets (at national, regional and local levels) by bulking the identified waste/recyclate streams which could then be transported to other facilities in the area for recycling, composting and recovery. Lastly, the PS notes that the improvement of existing depots/ bulking sites are also identified as a key action within the revised Surrey Joint Municipal Waste Management Strategy Final as: “Action A33 - The Waste Disposal Authority will provide improved waste transfer stations and bulking facilities to reduce the haulage on transporting municipal waste. Safe, efficient and appropriate transportation is an important consideration.”

Alternative Site Assessment (ASA)

An alternative site assessment is also an important factor in the CPA satisfying itself that there is a genuine ‘lack of suitable non-Green Belt sites’, in accordance with Policy CW6 SWP 2008, to justify such inappropriate development in the Green Belt. The applicant has submitted an Alternative Site Assessment that used a wide range of methods to identify potential sites for assessment and a total of 24 sites were considered through the Phase I and Phase II Site Assessment process. The suitability of potential sites was considered based on a range of factors including site size, proximity to the Metropolitan Green Belt, location, proximity to the waste source, proximity to protected sites, access constraints and commercial availability. Following the assessment of the identified potential sites, the remaining sites were ranking according to suitability and availability.
The ASA sets out that the proposed development is intended to receive RCV deliveries from the Reigate and Banstead Borough and the Tandridge District under the waste contract between Surrey County Council and SITA. Therefore, to minimise distance travelled by RCVs between collection routes and the MBF and to comply with the principal of self-sufficient waste management, potential sites would therefore need to be located either within Reigate and Banstead Borough or Tandridge District or close to the borders of those areas to ensure transport efficiency. As such, the geographical extent of the ASA’s search area included: 1. Land within Reigate and Banstead Borough; 2. Land within Tandridge District; and 3. Land within 2km, by road, of either of these areas.

Disaggregation

Following pre-application advice from the County Planning Authority, the ASA also considered whether sites were capable of accommodating the development in a disaggregated form. Notwithstanding the ASA’s methodology and its use of disaggregation, the applicant also notes that there are a number of benefits of locating all component elements of the proposed development on one single site, such as:

- Locating the fleet parking with the MBF would mean RCVs do not need to travel any distance following deposit of material at the end of their collection rounds;
- The fleet parking, welfare buildings and some tipping of dry recyclate for RBBC are already located together on the Earlswood site;
- All the elements are able to use shared infrastructure (including weighbridges, access points and internal roads, offices, car parking, security etc.).

Nevertheless, following CPA advice to ensure the ASA was as robust as reasonably possible, the applicant considered the potential for a disaggregated form of development. The development proposal has five fundamental component physical elements, as follows:
1) Fleet Parking; 2) Administration and welfare buildings for use by employees associated with the vehicle fleet and with the MBF; 3) the MBF building; 4) 4 external waste storage bays; and 5) a garage-sized building for storing items for re-use.

Elements 1 and 2 were noted to already exist on site in some form and would be formalised (in the case of Element 1) or relocated (in the case of Element 2) as part of the development proposal. The ASA argued that it is essential that Elements 1 and 2 are located on the same site as the welfare building for the fleet drivers is required to serve the fleet parking activity. The applicant also argues that the existing welfare building also serves the existing activities at the depot so if it was to be located on an alternative site, there would still be a need for an admin and welfare building to remain on site, albeit potentially in a smaller form.

There applicant noted that there are limited changes proposed to the fleet parking, such as the painting of white lines which would not be considered 'development' under Section 55 of the Town and Country Planning Act (1990) and the installation of replacement lighting columns which would be allowed under permitted development. It was therefore considered that an ASA would not be required to maintain the current fleet parking provision within the Green Belt. The ASA notes that there would be a small expansion of the fleet vehicle parking footprint and the welfare facility which would be considered 'development'. However, since the welfare facility would be associated with the vehicle parking, which largely already exists, the applicants considered that it would not be reasonable to search for alternative sites for this development since it is associated with the existing fleet vehicle parking facility.
The applicant accepts that there could be a case for looking for alternative sites for the fleet parking, if an alternative layout was chosen with the proposed materials bulking facility located in the space currently occupied by fleet vehicle parking. However, as the applicant reviewed this layout option before commencing the ASA (see layout options discussions below in this report), the applicant notes that it was not possible to fit the proposed building, external bays, reuse storage building, weighbridges and the manoeuvring space which would be required within the existing fleet vehicle parking footprint. Therefore, then ASA did not search for alternative sites for the fleet vehicle parking.

The ASA sets out that the above-mentioned elements 3, 4 and 5 are all required to receive, process and store waste delivered by Refuse Collection Vehicles from the Reigate and Banstead Borough and Tandridge District Waste Collection Authorities prior to transport off-site, and the applicant argues that all three parts must reasonably be located on the same site.

In order to consider disaggregation, the ASA sets out that the proposed development would consist of two groups of activities, closely related to each other, which could feasibly be located on separate sites. As the fleet parking and welfare building already exist on site, the following potential development forms were considered by the ASA:

1. A single site that could accommodate the entire development proposal; and
2. Retention of the existing fleet parking and welfare building at Earlswood and an alternative site that could accommodate elements 3, 4 & 5 of the development proposal.

Additionally, the ASA notes that the alternative site would need to provide an appropriate welfare building for the MBF, or incorporate such a facility into the transfer building, creating a larger footprint. Whilst it would be possible to also locate the fleet parking and welfare building on an alternative site, as these parts of the development proposal are existing, the applicant judged that it would be unreasonable to consider a development proposal where these component elements are also moved off site.

**Site Assessment Approach**

Sites were first subjected to a high-level sieving to remove sites that had fundamental or insurmountable constraints that would render the site unsuitable for the proposed development (either as a whole or in its disaggregated form). The criteria were as follows: does the site offer sufficient available land?; is the site covered by a European conservation designation?; does the site have a fundamental, irresolvable access problem?; and is the site in Flood Zone 2 or 3?

Sites brought forward were then subjected to a Stage 2 Site Assessment, which were developed following discussion with the CPA and using the guidance in Annex E (Locational Criteria) to Planning Policy Statement (PPS) 10: Planning for Sustainable Waste Management. The criteria adopted were as follows:

- Is the site is previously developed land or in active use for waste management?
- Is development of the site likely to lead to significant visual impact?
- Is development of the site in accordance with the Surrey Waste Plan 2008 waste uses?
- What is the site's standard of access?
- Is there potential to co-locate the development with existing waste uses on site?
- What is the likely impact on residential amenity?
- Is the site in the Green Belt?

- What is the distance from environmentally sensitive areas, such as Areas of Outstanding Natural Beauty (AONB), Areas of Great Landscape Value (AGLV) and Sites of Special Scientific Interest (SSSI)?

- How proximate is the site to waste sources? And

- Is the site available?

Nine sites were considered in the Phase II Site Assessment following the removal of 15 sites during the high-level Phase I Site Assessment. Of the nine sites assessed under Phase II of the site assessment, only one was outside the Metropolitan Green Belt, which was Salfords Aggregate Rail Depot in Redhill. However, the ASA argues that Salfords Rail Depot is constrained by a number of factors that limit its suitability for use for the development proposed, namely:

- The site is safeguarded from development under Policy MC16 of the Surrey Minerals Plan 2011 Core Strategy Development Plan Document (July 2011);

- The existing aggregate depot facility is currently operating at a very low throughput largely due to existing significant road access and land ownership constraints; and

- The configuration of the site and other potential future development including a replacement rail aggregate depot and new access site may constrain the scale of activity that could take place.

The ASA’s categorisation of the nine remaining sites, based on the results of the Phase II Site Assessment, is set out in table 1 below:

**Table 1: Applicant’s site categorisation**

<table>
<thead>
<tr>
<th>Suitable</th>
<th>Constrained</th>
<th>Strongly Constrained</th>
<th>Not Suitable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copyhold Works, Redhill</td>
<td>Earlswood Depot, Earlswood</td>
<td>Patteson Court Landfill, Nutfield</td>
<td>No sites identified</td>
</tr>
<tr>
<td>Potential impact on AONB</td>
<td>Local Nature Reserve close to site</td>
<td>Access</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Access; site layout</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rural location; location in relation to catchment</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rural location; access; site layout</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Access; rural location; location in relation to catchment</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Within AONB and AGLV</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Access; within AGLV; adjacent to SSSI</td>
<td></td>
</tr>
</tbody>
</table>
88 The ASA then considered the commercial availability of the sites. With reference to Copyhold Works, the ASA sets out that the site was being marketed for sale by tender during the early Summer 2013 with the property agent advising that tenders were being considered and the sale was very likely to go ahead; the site was therefore considered to be under offer and not commercially available. In respect of Oxted Sandpit, the ASA noted that from discussions with the site owner, the applicant understood the site would be available for development.

89 With reference to Salfords Aggregate Rail Depot, the ASA noted that the site is safeguarded from development under Policy MC16 of the Surrey Minerals Plan 2011 Core Strategy Development Plan Document (July 2011) and is currently used (at low intensity) for aggregate rail depot. Officers note that an application ref RE/P/13/00944/CON was made on 22 May 2013 at that site for the development of a rail facility and recycled/secondary aggregates manufacturing operations.

90 In respect of Little Orchard Farm, Hookwood, the ASA noted that this is an existing waste transfer station and that a recent planning application for ‘Construction of a new waste reception building, on a site including an existing waste reception building to be demolished, and the laying of a new concrete hardstanding area with sealed drainage for the storage of wood’ (ref. 13/00882/CON) was currently under consideration by the CPA. Officers note that this application was refused by the CPA on 8 August 2013 and that the applicant in that case has appealed to the Planning Inspectorate (ref APP/B3600/A/13/2206251).

91 With reference to Normans Corner, Smallfield, the ASA sets out that the site is an existing depot operated by R & S Etherington Ltd a skip hire and recycling operator and that no land was available as the full site was required for the existing operations. The ASA sets out that the site at Moorhouse Sandpits in Limpsfield was an established sand mineral working area with mineral workings permitted to 2030 with planning consent granted for the importation of washed sugar beet soil, compost, peat and naturally occurring soils and blending thereof with indigenous sand, with storage and export of finished product granted on 18/12/09. In light of the temporary nature of the minerals operations at the site, the site was not considered suitable for the proposed permanent built waste related development.

92 In respect of Taylors Hill Depot in Godstone, the ASA notes that the site is an existing builder’s merchant that benefits from a CLUED granted in 1993 and that the applicant understood that no land was currently available and the full site was required for the existing operations. In addition the site access/egress was noted to be poor. Lastly, with reference to Biffa Patteson Court Landfill, the ASA highlighted that the site operator failed to engage during the ASA process, though that as the site is an operational landfill with some parts of the site now restored and the site’s planning permission requires restoration by 2030, it was therefore assumed the site was not commercially available.

93 The result of the submitted ASA was that no potential sites were identified that were considered to be more suitable for use for the development proposed than the Earlswood site. One site was identified outside the Metropolitan Green Belt (Salford Rail Depot in Redhill) but for a number of reasons, including access and mineral safeguarding, that site was considered to be constrained by the applicant. All other sites considered are within the Metropolitan Green Belt and none of those sites were considered to be more suitable than the Earlswood site.
Location

94 SWP 2008 Policy CW5 sets out that waste proposals on unallocated sites (i.e. the part of the application site proposed to contain external bays and the reuse store that; an area of some 0.152ha) site would need to ensure that the larger the scale of development and traffic generation, the more important is a location well served by the strategic road network. In this case, the entire application site is accessed directly from the A23, which itself connects to the strategic highway network. As such, Officers conclude that the application would comply with SWP 2008 Policy CW5 in terms of its location, notwithstanding the County Planning Authority’s other comments on transport sustainability terms and transportation impacts set out later in this report.

95 With reference to the priority given in Policy CW5 over greenfield land to previously developed land, contaminated, derelict or disturbed land, redundant agricultural buildings and their curtilages, mineral workings and land in waste management use, Officers not that part of the application site formed part of Thames Water’s Sewage Treatment site. Although that part of the site is largely open, it has been in use by Thames Water and Officers therefore judge it to be previously developed land. As such, Officers judge that Policy CW5 has been complied with for that small part of the application site not allocated in the SWP 2008, with the site allocation boundaries only ‘indicative’ in any case.

Officer Assessment

96 SWP 2008 Policy CW4 states that planning permissions will be granted to enable sufficient waste management capacity to be provided to achieve the regional targets for recycling, recovery and diversion from landfill by ensuring a range of facilities is permitted. On the basis of the need case submitted, Officers judge that the proposed development would perform a role in the County achieving regional targets for recycling and accept that the site has been identified following an extensive search for sites in preparation of the SWP 2008 allocations.

97 SWP 2008 Policy WD2 safeguards existing waste sites stating that planning permissions should be granted. The also NPPF sets out that planning applications which comply with an up to date Development Plan should be approved and refusal should only be on the basis of conflict with the Development Plan and other material considerations. Officers consider that the applicant has provided a clear need argument for the proposed development in this location, as compared to other sites potentially available. The County Planning Authority is satisfied that this site is the most suitable proximate site to handle the waste collected by RBBC and TDC.

98 At the heart of the NPPF 2012 is a presumption in favour of sustainable development and the NPPF makes clear that this has three dimensions: economic, social and environmental. Given the robust Alternative Site Assessment and a sufficiently clear need case for both the built development proposed and the appropriateness of the location to receive up to 110,000 tpa of waste, the proposal would also comply with SWP 2008 Policy CW6. The Key Development Criteria from this site’s allocation in the SWP 2008 are also judged by Officers to have been met, with consideration set out below in the relevant sections of this report.
Government policy on transport is set out in part 4 ‘Promoting sustainable transport’ of the NPPF (paragraphs 29 to 41). The NPPF recognises the important role transport policies have in facilitating sustainable development and in contributing to wider sustainability and health objectives with the Government recognising that different communities will require different policies and measures, and the opportunities for maximising sustainable transport solutions will vary from urban to rural areas. Developments that generate significant amounts of movements are required to be supported by a Transport Statement or Transport Assessment and plans and decisions should take account of opportunities for sustainable transport modes to avoid the need for major transport infrastructure (which will depend on the nature and location of the development), can suitable and safe access for all people be achieved; and can cost effective improvements be undertaken within the transport network to limit the significant impacts of the development, with development only being refused on transport grounds where residual cumulative transport impacts are severe.

Traffic related impacts associated with waste developments are also covered within Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10). Paragraph 3 of PPS10 sets out the Government’s Key Planning Objectives states that “Regional planning bodies and all planning authorities should, to the extent appropriate to their responsibilities, prepare and deliver strategies” that, amongst other matters: “help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations;”

In relation to determining planning applications for waste management facilities paragraph 29 of PPS 10 states waste planning authorities should consider the likely impact on the local environment and on amenity and refers to Annex E which sets out a range of factors which should be assessed when assessing the suitability of sites and areas against the criteria in paragraph 20, including: “traffic and access – considerations will include the suitability of the local road network and the extent to which access would require reliance on local roads.”

SWP 2008 Core Strategy policies establish sequential principles for the location of waste management facilities and an approach for development in the Green Belt. Policy CW5 (Location of Waste Facilities) sets out as follows principles for considering the location of waste facilities when allocating sites in development plan documents or considering proposals on unallocated sites: “priority will be given to industrial / employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network; and that: the larger the scale of development and traffic generation, the more important is a location well served by the strategic road network or accessible by alternative means of transport.”

SWP 2008 Policy DC3 sets out matters that the County Council considers when assessing proposals for waste related development and the information that is expected to accompany planning applications. In relation to traffic that would be generated by a proposal this information includes an assessment of the level and type of traffic that would be generated and an assessment of the impact of that traffic, the suitability of the access...
to the site and the highway network in the vicinity of the site including access to and from the motorway and the primary route network. Policy DC3 also requires adverse effects on neighbouring amenity including transport impacts to be assessed. As noted above, the KDC from the SWP 2008 also include:

“Access arrangements and traffic impacts: access into both sites requires improvement and the A23 Horley Road suffers from peak hour congestion, with a pinch point at the traffic lights south of the site. Proposed development of the site to the west of the sewage treatment works should consider linkages with the sewage treatment works and civic amenity facility to minimise traffic impact and overall traffic numbers. A transport impact assessment should be undertaken and submitted with any planning application.”

104 Reigate & Banstead Borough Local Plan 2005 Policy MO4 states that if proposals would exacerbate transport problems or make conditions more hazardous for highway users, the County Highway Authority and Borough Council will ensure where appropriate that necessary improvements are designed, fully funded by the developer and completed to accommodate safely the traffic related to the development.

105 The applicant has submitted a Transport Assessment (TA) in support of this application, which sets out that the Earlswood Depot currently has a permit to receive 75,000 tonnes of waste and 260 tonnes of hazardous waste per year. The new MBF for the site has been designed to be capable of handling approximately 110,000 tonnes of waste material per year and would provide RBBC and TDC a new facility as part of their waste collection services. The current RBBC services deliver waste and recyclable materials to various third party sites as well as to Earlswood, which currently receives dry recyclates only.

106 The TA notes that the Earlswood site is currently used as a depot which includes for parking RBBC RCVs and therefore many of the trucks already return to the site at the end of a shift empty. The TA sets out that through the proposed development, they would return to the site fully laden, and thereby reduce overall vehicle mileage for the waste collection in the district. TDC waste collection services deliver to various third party sites and through this development they would also deliver to Earlswood thereby consolidating the TDC operation.

107 The Transport Assessment identifies that 46 to 53 RCVs arrive onsite per day depending on the refuse collection rounds which are undertaken on different days. The proposed MBF would generate an addition of 8 RBBC RCVs and 26 TDC RCVs arriving onsite per day. The highest number of trip generations would be experienced during the hours of 05:00-06:00 and 13:00-14:00, outside peak traffic hours. The TA identifies that 3 bulker HGVs currently leave the site per day. The proposed MBF would generate an addition of 17 bulker HGVs to the site per day. These vehicles would arrive and depart the site between 07:00 and 18:30.

108 The HGVs loaded with bulked waste streams such as paper/card, plastic and metal would be delivered to an appropriate recycling facility. Dry recyclate would either be transported to Edmonton Recycling Facility in Enfield or to a facility in Shotton. Food waste would be transported to Anaerobic Digestion (AD) facilities including SITA’s site in Mitcham and Twinwoods AD Plant in Milton Ernett, Bedfordshire. Any non-recyclables would be bulked, loaded and transported to Allington Quarry Waste Management Facility in Kent for energy recovery. Residual waste would be minimal and, if necessary, diverted to landfill.

Access

109 The access to the site would remain from the current depot access which forms a priority junction off the A23 Horley Road. An internal road would connect the depot access to the MBF. New parking arrangements are proposed for the HGVs, vans and staff cars. The overall total number of parking spaces would increase by thirty seven spaces. This reflects
the additional spaces that have been provided for the cars of the HGV drivers, which under the current arrangement, are shared with the truck bays.

110 As part of the TA, traffic surveys were undertaken on the A23, including a Manual Classified Count of the site access, and Automatic Traffic Counters placed on the site access and to the north of the site on the A23. The traffic counters showed that the A23 is a heavily trafficked road but has defined peak hours which were identified as 0800-0900 in the morning and 1700-1800 in the afternoon. However, the TA notes that the current Earlswood Depot has traffic peak periods that do not coincide with the peaks for general traffic, as the peak Depot hours are 0600-0700 in the morning and 1300-1400 in the afternoon. An accident analysis of the A23 was also included in the submitted TA, and this considered the personal injury accidents for the past five years. The applicant sets out that the analysis demonstrates that on the section of road in close proximity to the depot access (considered to be within 300m north and south) there had been no serious and five minor accidents over the five year period up until October 2012.

111 Officer’s note: Updated accident analysis was sought from the County Highway Authority on 17 December 2013. This showed that from 1 November 2012 to 30 September 2013 (the most up-to-date data available at the time of writing this report), no serious accidents had occurred and there was no obvious change to the character of minor accidents in the area assessed in the TA. To be clear, the TA’s study area extended from Woodhatch Road/Maple Road junction in the west to the Three Arch Road junction with the A23 in the east and north to beyond junction of Brighton Road/Woodlands Road. In that extended study area, there were 47 minor accidents over 5 years (i.e. approx 10 a year) - and a further 7 in the area from 1 November 2012 to 30 September 2013. Of the latest 7 minor accidents, one was at the access to the Earlswood CRC but the County Highway Authority note that all the recent minor accidents were judged to be ‘slight’ and they consider that there is no obvious change in the apparent pattern / character of minor accidents.

112 A comprehensive trip generation forecasting exercise was also undertaken for the proposed development. This used refuse vehicle rounds data for both RBBC and TDC, weighbridge data and observed traffic count data to produce the future forecasts. Most of the RBBC RCVs are not new to the site but some would follow a different route to the site than they do currently, whereas all TDC RCVs would be new to the site. The trip forecasts used in the TA included additional bulker trucks, additional new staff cars, vehicles to the taxi MoT centre and an allowance for growth in annual waste arisings. Overall, the TA sets out that the development is forecast to generate an additional 140 two-way trips per day and that a traffic capacity impact analysis on the site access has been undertaken to consider this change. To clarify, the additional daily trips (one-way) generated by the development are predicted as follows: RCVs – an additional 34; Bulker HGVs – an additional 17; Staff cars – an additional 9; and Taxis for MoT – an additional 10.

113 Following discussions with the County Highway Authority, the impact on the wider road network, especially the Three Arch Rd traffic signal junction to the south of the site was not judged to be necessary in this case as the data showed that there would be no significant net change in traffic at that junction. The capacity analysis of the site access also demonstrated that the Three Arch Rd traffic junction currently operates within capacity and that in the predicted years of 2014 and 2024 used in the TA with traffic from the proposed development added, the junction would continue to operate within capacity. The TA undertook sensitivity testing of the junction assuming an extreme scenario of all the TDC trucks arriving at the site from the north in a single hour, and the applicant submits that this demonstrates that the junction would operate within capacity.
Emergency Vehicles

114 With reference to the concerns raised by representations, the probability of a vehicle turning into the depot and delaying an emergency services vehicle was also considered as part of the TA. Specifically, the TA took account of local concerns about the impacts that the additional traffic associated with the future development may have on the A23 with respect to emergency service vehicles in particular ambulances, travelling south past the depot towards the nearby East Surrey Hospital. The TA sets out that analysis undertaken demonstrates that the additional traffic generated by the development could be accommodated by the existing site access junction. This meant that the junction operates within the capacity it was designed for and without any residual delay or congestion to general traffic during the six critical periods that were modelled by the applicant.

115 Nevertheless, the TA accepts that a vehicle immediately following a truck that is turning right into the Depot would have to slow and may need to stop momentarily whilst the truck turns into the site and that it is possible that this vehicle could be an emergency services vehicle, such as an ambulance, under ‘blue lights’. The TA argues that as the highest number of right turning depot vehicles is between the hours 1400 and 1500 (currently this is 20 vehicles), this is equivalent to an arrival rate of 1 vehicle on average every 3 minutes. The TA argues that with the proposed development, there would be a vehicle arriving every 1.7 minutes during this period and that the likely probability of an ambulance and an additional truck arriving at the junction at the same time is low. Were it to happen, the TA notes that ambulance is likely to pass the truck, a manoeuvre that is common for the emergency services through the road network. The TA therefore argues that it would be very unlikely that the additional trips on the local road network that result from the proposed development would have any significant detrimental impact on emergency service vehicles.

116 The TA also sets out that measures to manage trips from the development have been identified, including the implementation of a Construction Traffic Management Plan post any planning consent, the maintainence of an ongoing Servicing and Delivery Plan and a Staff Travel Plan. Overall, the submitted TA argues that the proposed redevelopment of Earlswood Depot would have no detrimental impacts on the local highway network.

Officer Assessment

117 The County Highway Authority (CHA) has assessed the submitted information on highways and access. Additionally, the CHA has provided a response to the points raised in representations and by the Parish Council.

118 In respect of the comments raised relating to the highway capacity in proximity to the application site, the CHA note that the applicant has modelled the existing access point / A23 Junction to assess whether the proposed development can be accommodated without creating undue delay on the existing highway network. The highway authority required the applicant look at the proposed development 10 years post opening (2024) with the development traffic added as well as undertaking a sensitivity test which modelled all Tandridge DC trucks arriving at the site from the north in a single hour. The models show that all arms of the junction operate within capacity with the development in place and during both traffic and site operation peak time periods. It should also be noted that the peak hours of operation for the depot are 0600 - 0700 & 1300 - 1400 and do not coincide with the network peak on the A23 of 0800 - 0900 & 1700 - 1800. On the basis of this analysis the highway authority do not consider the provision of a ghosted right hand turn lane into the Depot is required and the development would not hold up traffic travelling south on the A23.
With reference to the proposed development’s generation of vehicle movements, the CHA notes that the applicant’s analysis demonstrates that the development would generate approximately 140 two way movements per weekday - with 102 (73%) of these movements being HGV/Refuse Collection Vehicle movements. A trip generation forecast exercise has been undertaken looking at existing refuse collection vehicle rounds data from RBBC & TDC and the likely routes they would take. Analysis of these routes demonstrates that the development would not add a significant amount of traffic to the Three Arch Road Junction as most vehicles are likely to depart to/arrive from the north, whilst current RBBC vehicles which off load at the Britanniacrest site on the A217, and then drive back to Earlswood would now off load at Earlswood, reducing the amount of trips through the Three Arch Road junction.

In respect of the concerns raised about potential risk of accidents that would occur as a result of this development, the CHA note that there have been no accidents in the last 5 years that involved any vehicles turning into or out of the depot access from the A23. There have been a cluster of accidents at the A23 / Three Arch Road junction, and whilst the highway authority are planning improvements to this junction in the future, as the proposed development will not add a significant amount of traffic to this junction, it is not considered reasonable for the development to contribute towards these improvements.

In response to the comments of the Parish Council, the CHA have stated that they do not accept the claims made that they have been inconsistent. The CHA note that the Redhill Aerodrome application did modelling on the Three Arch Road junction on the basis that approximately 25% of traffic generated by the aerodrome would be passing through the junction and this modelling showed that this 25% exacerbated the congestion at the junction to an extent that it was reasonable for the CHA to seek mitigation towards this. The Unilateral Undertaking provided by the developer for the Redhill Aerodrome scheme followed negotiations with the County Highway Authority on the level of contribution deemed necessary for mitigation measures.

The CHA also noted that the analysis of the Earlswood Depot application includes a trip generation forecast exercise looking at existing refuse collection vehicle rounds data from RBBC & TDC and the likely routes they would take. The CHA advise that analysis of these routes demonstrates that the development would not add a significant amount of traffic to the Three Arch Road Junction as most vehicles are likely to depart to/arrive from the north, whilst current RBBC vehicles which currently off load at the Britanniacrest site on the A217, and then drive back to Earlswood, would only load at Earlswood, thereby reducing the amount of trips through the Three Arch Road junction. The CHA note that whilst over an average day the number of movements through the Three Arch Road junction may increase by 11, this was considered to be a negligible impact based on the amount of traffic passing through this junction and in highway capacity terms. The CHA therefore advises that it would not be reasonable to resist the application or seek financial contributions that meet the NPPF tests on this basis.

Lastly, in respect of the Parish Council’s claim that the trucks (HGVs) cannot collect a full days load and thus have to return to the depot and go back out to return again, the CHA confirm that the submitted TA was based on the current pattern of drops – so if a truck does a two drop currently (i.e. at a third party site) it would still do a two drop in the future but at Earlswood. The last drop for a RBBC truck would be loaded instead of empty and that ‘empty’ is the current arrangement for the majority of returning RBBC trucks. Therefore, trucks needing to be emptied during the day has been taken into account in the TA. Most of the RBBC trucks would return to the site from the north, compared to the current arrangement whereby they return to the site from the south, having dropped off at the Britanniacrest private facility in Reigate Road. This therefore reduces the number of RBBC trucks through the Three Arch Junction.
On the basis of all the evidence submitted, the CHA judges that the impact of this proposal has been adequately considered. In light of the test of the NPPF, the County Highway Authority considers that the applicant has adequately demonstrated that the residual cumulative transportation impact of the additional operational throughput proposed is not severe. Officers consider that the application would comply with SWP 2008 Policy CW5 for that part of the proposal on unallocated sites, given the site is well connected to the strategic highway network. In addition, Officers consider that the KDC relating to access have been met for the purposes of SWP 2008. In terms of paragraph 32 of the NPPF, the County Highway Authority is satisfied that the residual cumulative transportation impact of the development’s proposed additional operational throughput is not severe, and the application therefore complies with the NPPF 2012, subject to their suggested conditions and informatives to comply with SWP 2008 DC3.

ENVIRONMENT & AMENITY ISSUES

Surrey Waste Plan 2008 (SWP 2008)
Policy DC2 Planning Designations
Policy DC3 General Considerations

Reigate & Banstead Local Plan First Alteration 2005
(saved) Policy Pc2C – Sites of Nature Conservation Importance (SNCIs)
(saved) Policy Pc2G – Local Nature Conservation Interest
(saved) Policy EM3 – Design and layout
(saved) Policy Pc8 – Ancient Monuments, County Sites of Archaeological Importance and Areas of High Archaeological Potential

Paragraph 56 of the NPPF states that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Paragraph 61 states that although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment. Lastly, Paragraph 64 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Government guidance in relation to waste planning, is dealt with in PPS10: Planning for Sustainable Waste Management. PPS10 states that the overall objective of Government policy on waste, as set out in the strategy for sustainable development, is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. In considering planning applications for waste management facilities, waste planning authorities should concern themselves with implementing the planning strategy in the development plan and not with the control of processes, which are a matter for the pollution control authorities. The planning and pollution control regimes are separate but complementary. Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the release of substances to the environment to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health.

The planning system controls the development and use of land in the public interest and should focus on whether development is an acceptable use of the land, and the impacts of those uses on the development and use of land. PPS10 states that decisions on development proposals should be based on sustainable development principles, which includes the effective protection and enhancement of the environment. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced. In considering planning applications for waste management
facilities waste planning authorities should consider the likely impact on the local environment and on amenity. These can also be concerns of the pollution control authorities and there should be consistency between consents issued under the planning and pollution control regimes. As such, there has been liaison and consultation with the Environment Agency, who are the pollution control authority.

128 SWP 2008 Policy DC3 requires that applications for waste related development be accompanied by sufficient information to show that the proposals will not significantly affect people, land, infrastructure and resources. In respect of the proposed development relevant matters are visual impact, biodiversity, noise, air quality (bioaerosols and odour) and proximity of residential properties. However, it is important to stress that Government guidance advises that waste planning authorities should not concern themselves with the control of processes, as they are a matter for the Environment Agency.

129 RBLP 2005 Policy EM3 states that in order to maintain and enhance the natural and built environment of the Borough, all proposals for business, industrial, and storage and distribution use will normally be required to:

(i) make the best use of the physical characteristics of the site, views into and out of the site and aspect; existing trees, vegetation and other interesting features will be expected to be retained;

(ii) be of a scale and form which would respect the general pattern of development in the area and avoid undue changes in building heights;

(iii) be of a scale and form, where situated on the edge of the urban areas, as to achieve the appropriate transition to the countryside beyond;

(iv) comprise a layout and design which does not unreasonably affect the amenities of adjoining properties;

(v) be designed to a high standard incorporating elevational treatments, roofscape and building materials which complement the character of the area;

(vi) be vertically sub-divided into separate units, each with individual entrances, where the building is designed as small suites of accommodation;

(vii) incorporate facilities for the disabled;

(viii) incorporate substantial landscaping proposals which should be considered at an early stage as an integral part of the overall design;

(ix) provide open space for the enjoyment of employees as part of developments within Employment Areas;

(x) provide satisfactory means for the storage and collection of refuse;

(xi) where necessary, extraction equipment and plant should be fitted in as unobtrusive manner as possible;

(xii) comply with the currently adopted standards for highway design, parking and servicing provision;

(xiii) have regard to the Guidelines on Noise Control published by Surrey County Council and

(xiv) take into account the requirements of energy conservation.
AIR QUALITY (emissions, dust, odour)

130 Government guidance in respect of emissions and air quality, is provided by Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10). Paragraphs 21 and 24 of PPS10 refer to the material considerations that waste planning authorities must take into account in determining planning applications. Paragraph 21 states that in deciding which sites and areas to identify for waste management facilities, waste planning authorities should assess their suitability for development against certain criteria (Annex E), which includes factors such as air emissions and dust. Paragraphs 27 and 29 of PPS10 state that:

The planning system controls the development and use of land in the public interest and should focus on whether development is an acceptable use of the land, and the impacts of those uses on the development and use of land…’ and ‘…In considering planning applications for waste management facilities waste planning authorities should consider the likely impact on the local environment and on amenity…’

131 The new NPPF and NPPF Technical Guidance expect planning authorities, through policies in plans and in determining planning applications, to ensure that proposals do not have an unacceptable adverse effect on the natural environment or human health by “preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution” (paragraph 109). To prevent unacceptable risks from pollution planning decisions should ensure new development is appropriate for its location and that the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and take account of the potential sensitivity of the area to adverse effects from pollution (paragraph 120). In relation to dust emissions, policy in the NPPF is that unavoidable dust emissions should be controlled, mitigated or removed at source.

132 Policy DC3 of the SWP 2008, states that planning applications should assess the release of polluting substances to the atmosphere from facilities and transport and identify appropriate mitigation.

Odour Impacts

133 The applicant has submitted an assessment of air quality effects and this notes that odour impacts can occur over large distances from source, depending on the meteorological conditions. The worst odour dispersion conditions often occur at night, under stable atmospheric conditions. Potential odour receptors are located at the residential areas of South Earlswood to the south, including Maple Road, Whitebushes to the southeast, Royal Earlswood Park to the northeast and Redhill and users of the golf course, to the north. East Surrey Hospital, to the east of the proposed development, would also be sensitive to odour emissions, although it would be over 500 m from any odour sources.

134 In respect of odour-generating activities, the applicant notes that the proposed MBF would handle MSW, including food waste, and that much of this waste, such as paper, glass, cans and plastic, would be dry, and would be unlikely to emit any odours. Although food waste would be collected separately, the applicant notes that residual black bag waste may still contain some odourous components. The ‘wet’ and putrescible food waste has the potential to give rise to significant odour emissions and the green waste from public parks and gardens stored at the external bulking bays may also be a source of odour. The collection and bulking vehicles that operate at the site are also a potential odour source. Odour emissions during the operation of the proposed MBF could arise from the following activities: Waste transport and delivery to the site; Unloading of waste materials; and Storage and decomposition of waste materials prior to removal.
In terms of mitigation ‘designed-in’ to the development proposals, the applicant notes that RCVs would enter the MBF via the tunnel and roller shutter doors at the south façade of the MBF and that the tunnel would help prevent wind blow through the MBF, and limit odour emissions. The applicant also notes that the food waste would be stored within a bay at the north of the building, as far from receptors to the south of the application site as possible. Vehicles removing the bulked waste from the site would also enter an enclosed loading area at the west façade of the MBF through roller shutter doors, which would be closed before loading takes place. Therefore, the applicant argues that odour emissions from waste delivered and stored at the site would be contained.

**Odour Complaints**

The applicant has identified that seven complaints relating to odour from the CRC or depot were received by RBBC between 1st January 2007 and 1st January 2012. The areas affected by odour are located to the south, east and north of the application site. Four of the complaints were made in 2007, two in 2011 and one in 2012. The applicant notes that it is difficult to determine the source of an odour without an investigation at the time the complaint was made. The information regarding the nature of the odour relating to the complaint was provided by RBBC, with no further details on whether the complaint was investigated at the time and the odour source verified. Analysis of the wind conditions at the time can help track the likely origin of the odour; however, the applicant notes that wind data comes from Gatwick Airport, 7.5 km south of the application site, and there may be some local variation. Furthermore, the applicant highlights that there is no information on the time of day that the odour annoyance leading to the complaints occurred or the atmospheric stability conditions at the time. During stable conditions, which often occur at night, odour dilution and dispersion is reduced, and odour annoyance can occur over a wide area, remote from the source.

In respect of the complaint received on 15th April 2007, due to odour at Royal Earlswood Park, this was made when the wind was blowing from the north. Given that Royal Earlswood Park is due east of the operations adjacent to the application site; the applicant argues that it was likely that the odour at this time was being emitted from Patteson Court Landfill. The ‘distinctive odour of rotten eggs’ is characteristic of hydrogen sulphide, which is formed in the anaerobic conditions found in a landfill. A complaint from Royal Earlswood Park was also made on 26th April 2012. Again the wind direction was from the north, and it is possible that the odour originated from the landfill site. The recycling centre was named in the record of this complaint; however, it is not known whether this was an assumption made by the complainant, or whether the recycling centre was identified as the source following investigation.

Additionally, the applicant notes that no characteristics of the odour relating to a complaint made from Brambletye Park Road on 16/06/2007 were recorded, though as the wind was blowing from the south on that date, from the direction of operations adjacent to the application site, it is possible that the odour came from the recycling centre/depot. Nevertheless, the applicant argues that as the odour was not characterised, it was also possible that the odour came from the Sewage Treatment Works (STW). Two complaints were also received on the 9th and 10th July 2007 from Wimborne Avenue and Maple Road describing a ‘rotting flesh/fish’ odour, and the wind direction and odour characteristic suggested that the odour may have come from the recycling centre/depot. The odour lasted for two days, or more. An odour complaint was also received from St. John’s Road on the 23rd March 2011 and this was made when the wind was blowing towards the application site from the direction of the complainant, and thus the landfill site. Therefore, the applicant argues that it was likely that the odour was being emitted from the landfill.
Most recently, a complaint was made on 12th September 2012 from Maple Road, owing to odour from the recycling centre/depot on the basis of the direction of the wind on that day. The applicant argues that this odour may have also come from the STW. As such, the applicant argues that there is no strong evidence that the odour complaints relate to operations at the recycling centre or depot and no odour complaints have been recorded by the EA. Furthermore, the applicant argues that it is likely that some of these complaints relate to odour from the Patteson Court Landfill, or odour from the Sewage Treatment Works.

**Odour Mitigation**

The applicant has submitted an Odour Management Plan to ensure that the site is managed in such a way that the risk of odour emissions is minimised. It includes procedures to be implemented during adverse conditions, or when there is a risk that odour would be detectable beyond the application site boundary. Should complaints be received from the public, the odour source would be identified, and corrective actions implemented. However, a number of odour mitigation measures have also been included in the design of the MBF:-

- The waste transfer of all odorous waste takes place within an enclosed building;
- Roller shutter doors would be closed after vehicle entry, if operations allow; [Officer’s note: representations have taken issue with the applicant’s use of the term ‘if operations allow’ and question whether the door would be normally be left open. Officers confirm that the County AQ Consultant has considered the practicalities of such odour management measures in their response to the CPA, as set out below.]
- The food waste would be bulked at a bay located at the northern end of the MBF, well away from nearest receptors that are located to the south of the application site, and stored in a sealed bay;
- Waste holding times would be carefully controlled, and any waste found to be particularly malodorous would be removed from the site as quickly as possible;
- The mist air dust suppression system would also help remove odours from the air within the MBF building, with the mist providing a large surface area for the capture of odour molecules. The mist would also create a humid environment within the building, minimising the evaporation of odour molecules from the waste;
- Relevant staff and contractors would receive training with regard to odour management and control;
- An odour monitoring regime would be implemented, and an odour diary maintained, along with a log of any odour complaints received from the public.

**Dust Impacts**

The submitted Air Quality assessment notes that particles responsible for most dust annoyance would mostly deposit within 100 m of the source (Environment Agency, 2004). Therefore, any receptors within 100 m of a waste facility are at risk of exposure to dust annoyance. There are six dwellings to the south of the application site, at 41 to 46 Maple Road, that are within 100 m of the site boundary. Earlswood Common, a local nature reserve adjacent to the northern site boundary, may also be sensitive to fugitive dust emissions.

The applicant notes that the proposed MBF would handle kerbside collected municipal solid waste and dry recycling. Some waste, such as food, would be wet; however, there is a risk of fugitive dust emissions from some dry waste streams, such as road sweepings. Dust emissions during the operation of similar facilities could therefore arise from the following activities: Unloading and loading of waste materials; Storage of dry waste materials; and vehicles tracking dust off the site on their wheels. The applicant also notes that there would also be an area just to the north of the MBF building where all bulk
vehicles would be sheeted prior to leaving the site, though they highlight that there would be no dust emitting activities at the parking areas of the depot across the northern part of the application site.

143 As noted above, most of the waste handling activities would take place in the enclosed MBF where waste would be bulked prior to removal off-site, with RCVs entering the building via a tunnel and roller shutter doors at the south façade of the MBF. The entrances to the MBF and the loading area were noted to be approximately 70 m and 90 m from the nearest residential receptor to the south of the application site respectively. The entrance to the MBF would also be screened from such receptors by a tunnel, and the loading area would also be enclosed in a tunnel, which the applicant argues would greatly reduce the risk of dust emissions.

144 In addition, the applicant highlights that there is also an area of trees between the MBF and the residential receptors and that these trees are to be retained and would act as a barrier to the movement of any dust. The MBF would also be hard surfaced and would be regularly cleaned, thus minimising the risk of wind-blown dust, or dust raised by vehicle movements. In terms of wind-borne dust, the applicant predicts that the wind would blow from the application site towards the residential receptors to the south of the site for only 8% of the time. Some of the days when the wind is blowing towards the receptors are also likely to be ‘wet days’, when there would be natural dust suppression. On this basis, the applicant argues that it is highly unlikely that dust annoyance would occur due to the proposed development and that as any potential dust generating activities would occur over 100 m from the northern boundary of the application site there would be insufficient dust to affect Earlswood Common.

**Dust Mitigation**

145 The applicant notes that the MBF would include a built in dust suppression systems to further minimise any risk of fugitive dust emissions from waste handling. The applicant has also submitted a Dust Management Plan to ensure that the site is managed in such a way as to minimise the risk of dust emissions, such as:-

- All roads would be hard surfaced;
- The external bulking bays would be three sided, and covered, which would help prevent the risk of dust entrainment by wind;
- The waste transfer of household waste takes place within an enclosed building;
- The RCVs delivering waste to the MBF would enter the building through a tunnel and roller shutter doors, which would be closed when operations allow. This would minimise fugitive dust emissions as the waste is unloaded;
- A mist air dust suppression system would be installed;
- Vehicles removing the bulked waste from the site would enter an enclosed loading area at the west façade of the MBF through roller shutter doors, which would be closed before loading takes place.
- Vehicles entering and leaving the site would be covered, or enclosed;
- Onsite vehicle speeds would be restricted to 5 mph;
- A road sweeper would be used on access roads and hard surfaced areas as required;
- Water suppression would be used during dry weather.
Construction Impacts

In respect of air quality impacts from the construction phase, the applicant suggests that measures to mitigate dust emissions would be required, in order to reduce impacts upon nearby residential properties. The applicant notes that mitigation measures are straightforward as most are routinely employed as ‘good practice’ on construction sites. The mitigation measures would be written into a construction environmental management plan (CEMP). Where mitigation measures rely on water, it is expected that only sufficient water would be applied to damp down the material and that there should not be any excess to potentially contaminate local watercourses.

Road Traffic Impacts / Cumulative Air Quality impact

The applicant submits that the proposed development would not cause any new exceedences of the air quality objectives and that mitigation measures to reduce pollutant emissions from road traffic are principally being delivered in the longer term by the introduction of more stringent emissions standards, largely via European legislation. The applicant therefore argues that it would not be appropriate to propose further mitigation measures for this scheme. However, with reference to the Redhill Air Quality Management area the Borough Council has concerns about a recent application by Day Aggregates leading to an increase in HGV movements (application ref RE/P/13/00944/CON for the development of a rail facility and recycled/secondary aggregates manufacturing operations), and between that application and the current proposed bulking facility a 20 % reduction in car traffic would be required on the A23 in Redhill to offset the increased pollution from the additional HGV traffic. The Borough Council therefore request that the CHA takes account of the cumulative impact of each development on HGV traffic on a route by route basis. In response, the CHA confirm that the submitted TA was based on up-to-date traffic counts and this reflects the current highway network and they judge it to be unreasonable to require the Earlswood Depot application, which is not EIA development, to take into account other developments that have yet to be built or even determined by the County Planning Authority. In addition, the CAQC advises that a route that by-passes the AQMA could be agreed although this could lead to increased HGV journey times and therefore increased CO2 emissions within the County.

The Borough Council have referred to concerns over ‘development that leads to a significant rise in HGV movements.’ However, Officers note that the Design Manual for Roads and Bridges (DMRB) guidance on EIA for air quality indicates that significant impacts on air quality are more likely where a development would lead to an increase in HGV flows of 200 annual average daily traffic (AADT) or more. Although noting that this development is not EIA, Officers judge that such guidance is useful to determine what could reasonably be described as ‘a significant rise in HGV movements.’ On the basis that this proposal would generate 17 additional HGV movements per day, Officer do not judge that this is a ‘significant’ increase.

Email dated 28 November 2013 from SITA UK

The applicant confirmed that they are happy to require their contractor to set up boundary air monitoring during works involving land which is suspected to be contaminated with Asbestos Containing Material and are happy to write this into a Construction and Environmental Management Plan.
Officer Assessment

150 As noted above, the CAQC has no objection to the proposed development subject to the securing of a pre-commencement Odour Management Plan to include:

- To keep the bulk loading bay doors shut – this bay is used infrequently compared to the RCV entry and exit and thus there should be no operational impediment caused by keeping the doors shut.
- Automatic weather station be installed on site and how this data shall be used and reported;
- All operations apart from within the external green waste loading bays be carried out within the building;
- No waste be stored outside apart from green waste in the external bays, however green waste shall not be stored for longer than 72 hours

151 During the course of this application, the applicant has argued that there would be no need for such an Odour Management Plan submission given the detail contained in their information submitted with this application. However, Officers disagree with the applicant and judge that it is necessary to formalise the exact details of odour management. The details can then be monitored by the County Planning Enforcement team during their visits to the site and remedial action taken if necessary. In this way, the CPA would retain robust controls over the operation of the site. The applicant would also require an Environmental Permit to operate the proposed development and the Environment Agency may themselves add odour controls to the operation of the site. The EA would be consulted as part of any determination of the ‘pre-commencement’ Odour Management Plan.

152 The dust mitigation measures set out by the applicant through their Dust Management Plan should also reasonably be secured by way of a pre-commencement condition. Officers suggest the two factors be combined into the securing of a Dust and Odour Management Plan prior to the commencement of development. Again, it is deemed necessary by the CPA to formalise the method of managing dust impacts from the development rather than rely on the mitigation measures recommended in the applicant’s AQ assessment, which do not contain a specific guarantee (therefore Enforceable by the CPA) that such measures would be implemented on site.

153 Lastly, Officers recommend that details of a Construction Environmental Management Plan should also be secured by way of a pre-commencement condition to deal with dust mitigation measures, in addition to construction hours, vehicle movements and use of lighting. Issues of noise and lighting are considered later in this report.

154 As such, Officers consider that an adequate assessment has been submitted of dust and odour risk, in addition to construction effects and the impact from road traffic, and that the application complies with SWP 2008 Policy DC3 in terms of any potential adverse effects on neighbouring amenity from odour generating waste types being received at the site and dust impacts during construction and operation of the proposed development.
LANDSCAPE AND VISUAL AMENITY

Paragraph 56 of the NPPF 2012 states that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Paragraph 61 states that although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment. Lastly, Paragraph 64 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

SWP 2008 Policy DC3 states that assessment of the visual and landscape impact of development on a site and the surrounding land must be submitted with any proposal and this should also identify appropriate mitigation so as to minimise or avoid any material adverse impact. In addition, Policy DC3 states that planning applications must demonstrate a high quality of design for new buildings.

Layout Options

Officers provided pre-application advice that a clear rational must been presented for the proposal to site the MBF close to the most sensitive boundary, in both Green Belt and residential amenity terms. Officers gave this advice because an option was initially discussed of positioning the MBF close to the eastern boundary of the site and north of the existing CRC. The applicants submit through their Design and Access Statement (DAS) that only two areas of the site were potentially large enough to cater for the MBF building itself and these were identified as the ‘central’ area abutting the A23, and the ‘southern’ area lying to the west of the existing CRC site (thus closest to the most sensitive residential receptors and within open Greenfield land in the Green Belt).

Central Option

This initial design stage concluded that in principle both locations for the MBF were viable in principle with the ‘central’ option requiring the fleet parking and RBBC admin/welfare building being relocated in the southern part of the site, and the ‘southern’ option retaining the expanded fleet facilities within the central part of the site. However, there were issues over the control of access, the location of ‘in’ and ‘out’ weighbridges, vehicle queuing, and the efficiency of vehicle movements around the MBF. Following consideration it was concluded that the ‘central’ location for the MBF was an unworkable solution; a number of MBF and circulation configurations were vehicle tracked in this location but none were considered feasible.

The actual size of MBF that is required to cater for the required amount of waste and recyclates left insufficient circulation space for safe manoeuvring of operational vehicles. The requirement to keep access open to the RBBC fleet area in the south meant that the required MBF weighbridges could not be located on the north/south spine road and created a torturous weighbridge arrangement. In addition the requirement for split body RCV vehicles to be double weighed on these weighbridges significantly increased the complexity of vehicle movements in and around the MBF and resulted in potential conflict between MBF and fleet vehicles on the north/south spine road. These reasons, together with the fact that the layout did not allow for the MBF operations to be self-contained and securable within one area of the site, resulted in the ‘southern’ option being the preferred zoning strategy by the applicant.
Southern Option

160 Whilst the ‘southern’ option offered the best opportunity to satisfy the operational brief and work within the constraints of the site, it was recognised by the applicant that for the ‘southern’ option to be deliverable potential noise and visual impact issues would have to be addressed. A key development was in response to acoustic assessment and the inclusion of a drive through ‘acoustic’ tunnel on the south of the building to mitigate vehicle and internal operations noise to the nearby residential receptors to the south of the site. The resulting final plan incorporates:-

- A dedicated and secure ‘waste zone’ in the south of the site including the MBF incorporating integrated admin/welfare accommodation, drive through loading tunnel, plant room, and acoustic enclosure with integrated store;
- A dedicated RBBC ‘fleet zone’ in the centre of the site; and
- Retained and improved RBBC operations in the northern

Volumetric Efficiency

161 Officers judge that justification that the MBF is volumetrically efficient is critical given both the site’s Green Belt setting and the fact that the applicants have opted to position the large MBF on the most sensitive boundary (i.e. southern closest to Maple Road). The applicant sets out in their submitted Design and Access Statement (DAS) that the highest point of the new development would be the MBF building. The DAS notes that whilst the ridge of its roof would sit at 10.37m higher than the ground level of the elevated CRC facility, the building height would be in keeping with the scale of the existing RBBC office and workshops in the northern half of the site and the current external bulking bays in the centre of the site. As such, the applicant argues that MBF would not appear out of place to incorporate part of the existing Earlswood Depot site. The DAS sets out that the applicant’s intention was to create an architectural solution that would be both volumetrically efficient and in materials which would make a positive response to the context of the existing site.

162 The DAS sets out that the primary volume is the main MBF building where waste and recycled materials will be stored. This has a shallow pitched roof which slopes up at 6 degrees from a 10.00m eastern and western parapet eaves level (above a site datum of 61.0m AOD) to a 12.02m parapet ridge level. The roof then extends beyond the face of the western face of the building to form its drive through loading tunnel. The overall height at the buildings eaves is set by internal clearance requirements between the underside of its steel portal frame structure and that required for safe operation of the internal equipment, including the minimum height clearances required for tipping vehicles to operate within the building and for the machinery used for moving material in and out of the storage bays.

163 The DAS sets out that the width of the MBF building is partly set by size of the bulking bays required to store the waste or recycled material and partly to achieve the vehicle manoeuvring space required by the tipping and loading vehicles which would work within this area. The ridge height of the roof is set by the minimum fall suitable for portal frame steel structures but having to maintain the potential to install photovoltaic panels to this roof has led the applicant to increase the standard pitch to allow for the increased loading should these panels be added.

164 The DAS sets out that the secondary volume is the acoustic enclosure running across the south side of the MBF building to shield the building from the nearby residential properties to the south in Maple Close and Maple Road. Its size is set by the clearances required for vehicles to enter on its north east corner, drive through, and either enter the MBF or exit the building on its north west corner. Given this design process, the applicant therefore argues that they have created a volumetrically efficient building and that the resulting design is as close a practical fit to the internal operational requirements contained within.
The applicant proposes a simple and refined over cladding of timber to key areas to contrast and soften the predominantly metal clad upper parts of the MBF building and being left to naturally weather would add visual texture to the building and reduce light reflection. The applicant has submitted several photomontages, one of which is attached as Figure 3. The photomontages show, in which the MBF is visible, that the massing and material measures adopted in the architectural design would mitigate the visual impact of the proposed development. The DAS sets out that the timber cladding to the MBF admin/welfare, the MBF Gatehouse, and the single storey RBBC fleet admin/welfare building, would ensure architectural consistency across the whole development.

Other Built Development’s Design

With reference to the External Bulking Bays, the DAS sets out that the 10m ridge height of the mono pitch roof over the external bulking bays is dictated by the clearance requirements within the bays below for loading operations and the bays sizes themselves dictated by the waste and recyclate storage requirements. In respect of the MBF Admin/Welfare, this abuts the MBF and its volume, split over two floors, is defined by the accommodation requirements of SITA Surrey. With reference to the Weighbridge Gatehouse, the DAS sets out that the internal floor level of the gatehouse is dictated by the requirement to communicate with RCV and HGV vehicles as they enter and exit the waste zone. Overall volume is provided on a single storey and determined by the requirements for an office with its own accessible WC plus kitchen facilities. In respect of the RBBC Admin/Welfare, the DAS sets out that a dual pitched roof was chosen by the applicant over a mono pitch to reduce the overall height of the facility; the volume was determined by RBBC accommodation requirements both for admin staff and for fleet drivers using the facility.

Submitted Landscape And Visual Impact Assessment (LVIA)

The applicant has submitted a LVIA using nine viewpoints, which were agreed with the County Landscape Officer, as being representative of the views from visual receptors within the local area. These are shown in table 2 below:

Table 2: Visual receptors assessed

<table>
<thead>
<tr>
<th>Location</th>
<th>Description</th>
<th>Distance from site &amp; direction</th>
</tr>
</thead>
<tbody>
<tr>
<td>45 Maple Road</td>
<td>Public Right of Way, residential</td>
<td>0.05km south</td>
</tr>
<tr>
<td>14 Maple Road</td>
<td>Public Right of Way, residential</td>
<td>0.2km south</td>
</tr>
<tr>
<td>Three Arch Road</td>
<td>Public Right of Way, residential</td>
<td>0.2km southeast</td>
</tr>
<tr>
<td>Woodhatch Road</td>
<td>Public Right of Way, residential</td>
<td>0.3km southeast</td>
</tr>
<tr>
<td>Greensand Way</td>
<td>Long Distance Trail, Public Right of Way</td>
<td>0.05km northeast</td>
</tr>
<tr>
<td>Royal Earlswood Park</td>
<td>Public Right of Way, residential</td>
<td>0.5km east</td>
</tr>
<tr>
<td>Earlswood Common &amp; Lakes</td>
<td>Public Right of Way, Recreation Area</td>
<td>0.7km east</td>
</tr>
<tr>
<td>Petridgewood Common, South Earlswood</td>
<td>Residential, Public Right of Way, Recreation Area</td>
<td>0.7km southeast</td>
</tr>
<tr>
<td>Mead Vale</td>
<td>Residential Area, Public Right of Way</td>
<td>1.1km northwest</td>
</tr>
</tbody>
</table>
The LVIA sets out that the site has a relatively limited visual envelope however it is within an existing waste depot and is adjacent to a sewage works, which are reasonably prominent features within the visual envelope. During construction, awareness of construction activity is likely to be limited to the visibility of the construction equipment, such as cranes, and the movement of construction vehicles. The construction works are only temporary and would be viewed in the context of the existing landscape of the site which features hard standing, a building and evidence of past mineral workings. The predominant visual effect during construction is also likely to be associated with the visibility of construction equipment and the appearance of the partially constructed buildings from the same receptors which in the early (Year 1) and later (Year 15) the LVIA assessment identifies that the proposed development is likely to be visible and prominent.

**Year 1 / Opening Year Effects**

The LVIA sets out that although there would be some minor changes in the landform of the site as a result of introduction of the MBF, overall the sites topography is expected to remain largely unchanged. The proposals would however result in the loss of areas of grassland, scrub and three trees with the development of the MBF. Nevertheless, the LVIA sets out that existing trees and shrubs to the south of the proposed MBF would be retained and managed accordingly, with an additional screen planting proposed in the area between this existing vegetation and the proposed MBF, on the southern boundary of the site. However, the proposed screen planting would not have matured sufficiently to adequately screen the development. In terms of landscape impact, the LVIA sets out that the extension of the waste related facility on the site would have a limited effect on surrounding landscape character and in particular on Earlswood Common to the north of the site and to the woodland areas [Felland Copse, Home Grove] to the south west of the site west of South Earlswood and Whitebushes as well as on the character of the urban areas particularly the closest communities of South Earlswood and White Bushes.

Despite the scale of the proposed development, the LVIA argues that the visual impact of the development would be limited due to the size of the visual envelope as a result of the relatively flat landform interspersed with small hills and the level of mature vegetation within the study area. The LVIA sets out that the site is particularly well screened from receptors to the north and west by both the topography and the mature vegetation associated with Earlswood Common, Redhill and Reigate golf courses and the woodlands of Felland Copse and Home Grove. However, the LVIA accepts that the principal visual receptors of the scheme would be the residential receptors along, and the users of, the adjacent public rights of way surrounding the site, notably:

- Maple Road south of the site
- Woodhatch Road [A2044] south of the site
- Three Arch Road south-east of the site; and
- Horley Road east of the site

Residential receptors on Maple Road and Three Arch Road, to the south of the site, are the closest to the proposed development and are likely to experience the greatest visual impacts. The view from these residential receptors already includes the adjacent community recycling centre and the visual impact from these locations are not expected to be significant.

**Proposed Mitigation**
The details of the landscape mitigation would include:-

- The retention of boundary hedgerows, wherever possible;
- The retention of hedgerow trees, wherever possible;
- Maintain, wherever possible, the existing topography of the site; and
- The use of sympathetic materials such as timber and non-reflective surfaces.
- The retention of existing screen planting on the southern boundary of the site;
- Supplement retained planting on the southern boundary with new screening; and
- Trees and shrubs species would be of local provenance, appropriate to the site and surrounding area.

**Year 15 [Residual] / Design Year Effects**

The LVIA predicts that by the design year [Year 15] the proposed mitigation planting on the southern boundary would have matured sufficiently to have replaced any lost trees and shrubs as well as enhancing the overall vegetation cover. The LVIA argues that the impact on the landscape/townscape character of the site by the design year [Year 15] would remain similar to that which is experience in the opening year [Year 1].

The LVIA also predicts that although the majority of sensitive receptors within the study area would not experience any change in view, there are a few receptors that lie in close proximity to the site, notably to the south on Maple Road and Three Arch Road which would experience a clear visual impact even with proposed planting matured. By the design year [year 15] the LVIA predicts that the other remaining adverse visual impacts would be from the A23 Horley Road and Redhill Football Club immediately east of the site, which would continue to have heavily screened views of the development through the boundary vegetation and across the existing car parks, particularly during winter months. However, the LVIA predicts that these views are greatly screened by the roadside and site boundary vegetation and tend to be transient in nature.

**Officer Assessment**

The County Landscape Officer (CLO) has assessed the submitted landscape and visual impact assessment (LVIA) and agrees with the methodology and concurs with the findings. For example, the CLO notes that the visual impact of the scheme had been identified as greatly limited due to the surrounding landform and extensive mature vegetation, including significant belts of trees at Earlswood Common, and South Earlswood to the north and south and the railway embankment vegetation to the east. Individual trees around the site add to general screening and the most sensitive views of highest amenity are from Earlswood Common and Mead Vale and these will remain unaffected due to the layout and design of the proposed building. The development would be visible from around Petridgewood Common but this is a glimpsed view, seen in the context of the existing development on site and would not be any more detrimental than existing.

The main visual impact has been identified as that from Maple Road and Three Arch Road, and in particular, residential receptors to the south of the site have been highlighted as likely to experience the greatest adverse effect, being closest to the proposed development. In response to this, the layout retains a critical mass of trees to the south of the principle building which provides the main mitigation for the development. The CLO advises that it is unlikely that the retained tree belt would completely screen the development, particularly in winter. The top of the main building mass is likely to remain visible. The CLO therefore agrees that those residential receptors to the south of the site...
in Maple Road would experience an adverse effect. As such the concentration of any mitigation is correctly focussed on the southern boundary of the site, with new planting supplementing the area of trees being retained. It would be essential to protect this area, both during construction by appropriate tree protection measures and in the longer term by management plan.

177 The CLO notes that no tree protection is indicated for this area in the arboricultural impact assessment with a Root Protection Area is indicated for single tree only; tree protection measures should therefore include the retained section of tree group ‘G1’ (at the southern boundary). New planting is also proposed to the south of the main building to bolster the retained area of planting and the CLO advises that the species proposed should achieve some height and stature in 10 to 15 years, reducing the adverse effect of development. However, the CLO would prefer to see hornbeam included in the landscape scheme in place of beech as hornbeam tends to be quicker in establishment and is of similar mature height, form and substance to beech. The choice of hornbeam may also bring mitigation earlier and the CLO notes that the ecological report also calls for hornbeam in its mitigation plan.

178 In respect of the triangular parcel of land owned by Thames Water, a large area of hard surfacing would be laid for loading/sheeting of vehicles and 4 external bulking bays would be constructed with a volume of approximately 3123m$^3$ and a maximum height of 10.01m. Thames Water’s land is undeveloped open land, which is now fenced-off as shown in Figure 6 attached to this report. However, Officers do not consider that the visual amenity impacts of the proposed development of this part of the application site, particularly the large bulking bays at 10.01 metres in height, would be so adverse as to warrant refusal of planning permission. This is because, Thames Water’s land is largely screened from the surrounding area, including the nearest residential properties on Maple Road.

179 In respect of the buildings proposed on the site of the existing bulking bays (see Figure 5 attached to this report), Officers note that the existing bulking bays are approximately 9 metres high and have a volume of approximately 3051m$^3$ and that this would be replaced by the RBBC Welfare & Admin building and the SITA Weighbridge Office, which together would have a smaller volume of approximately 1255m$^3$ and not exceed 5 metres in height. As such, Officers consider that the visual amenity impact of this part of the proposed development would be acceptable. The proposed reuse store which has a volume of approximately 130m$^3$ and a maximum height of 3.63m is likewise considered acceptable by Officers in visual amenity terms.

180 Officers have considered the justification provided for the MBF volumetric efficiency and the explanation for layout option chosen. It is unfortunate in visual/residential amenity terms that the applicants have opted for a layout which places the largest part of the development on the most sensitive boundary. However, there are obvious operational requirements from ensuring the efficient flow of different types/sizes of vehicles using the site by RBBC and TDC. The applicants highlight that a ‘pinch point’ currently exists at the north of the Depot site and Officers accept that any redevelopment/extension of this site should not replicate difficulties in vehicle flow and should reasonably deal with these. Officers judge that the applicant has justified that the MBF is as small as possible for the activities that would take place within, ensuring sufficient vehicle turning and internal operational space.

181 There would be a significant visual impact on the properties on Maple Road, and to a lesser extent from more distant receptors, even when proposed planting matures. In landscape terms, although the undeveloped piece of land on which the MBF would be located is not visible from the wider area, it is still open land in the Green Belt and this would be developed with a large-scale building and associated development of bulking bays to the north on a parcel of land owned by Thames Water. In terms of the site’s SWP 2008 Key Development Criteria on Green Belt, and the proposal demonstrating that it seeks to manage the impact on openness, the CLO is content with the landscape and
visual mitigation measurements including planting on the boundaries of the site area and the use of timber cladding for more prominent sections of the MBF building. In terms of minimising harm to the Green Belt, technical consultees have raised no objections to this development subject to the use of appropriate conditions.

182 Whilst Officers accept that there would be a significant visual impact on the properties on Maple Road, these would lessen over time as proposed planting matured. Officers also consider that the visual impact of the proposed development from more distant views would not be significant but that the MBF would nevertheless be noticeable from these visual receptors. Overall, however, Officers do not consider that the landscape and visual impact impacts of the proposed development viewed as a whole place it in breach of relevant development plan policy. Officers do not consider that the visual amenity impacts of the proposed development are so adverse as to warrant refusal of planning permission on this ground alone. The County Landscape Officer raises no objection subject to planting being secured on the southern boundary closest to Maple Road via a condition, in addition to protection of trees to be retained and further details of other boundary treatments. The visual receptors in close proximity to the application site have been taken into account by Officers. Although they do not warrant refusal, visual impacts have also been taken into account in the overall consideration of Green Belt harm considered below.

NOISE AND VIBRATION

183 The NPPF 2012 and NPPF Technical Guidance expect planning authorities, through policies in plans and in determining planning applications, to ensure that proposals do not have an unacceptable adverse effect on the natural environment or human health by “preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution” (paragraph 109). To prevent unacceptable risks from pollution planning decisions should ensure new development is appropriate for its location and that the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and take account of the potential sensitivity of the area to adverse effects from pollution (paragraph 120). In relation to noise policy in the NPPF is that decisions should aim to avoid noise from new development having a significant adverse impact on health and quality of life; ensure that any unavoidable noise emissions are controlled, mitigated or removed at source and establish appropriate noise limits for extraction in close proximity to noise sensitive properties.

184 Guidance on noise standards is provided for both day-to-day operations and nosier shorter-term activities such as soil stripping and replacement and construction and removal of noise/visual screen bunds. The NPPF Technical Guidance requires applicants to carry out a noise emissions assessment which identifies all sources of noise taking into consideration the proposed operating locations, procedures, schedules and duration of work for each, for the life of the proposed working and matters to be considered for proposals for the control and mitigation of noise emissions. Policy and guidance in PPS10 is also relevant as this proposal involves restoration by landfilling with imported waste materials. PPS10 Annex E sets out locational criteria including noise and vibration for assessing the development.

185 Surrey CC (Surrey Noise Guidelines) has produced its own ‘Guidelines for Noise Control Minerals and Waste Disposal 1994’. This Guidance states that new noise produced from development must be no more than 5 decibels expressed as a LAeq value above existing working day background noise levels (LA90).

186 SWP 2008 Policy DC3 (General Considerations) states that waste related development shall only be permitted where it can be demonstrated that any impacts of the development with regard to noise, can be controlled to achieve levels that will not significantly affect people, land, infrastructure and resources. Lastly, RBLP 2005 Policy EM3 states that all proposals for business, industrial, and storage and distribution use will normally be
required to have regard to the Guidelines on Noise Control published by Surrey County Council.

**Submitted Noise Assessment**

187 The applicant has submitted a noise assessment following discussions with the County Noise Consultant concerning appropriate noise monitoring location to determine the noise climate of the area within close proximity to site. The submitted noise assessment sets out that the proposed operating hours of the site are to be the same as the current operating hours of the depot and it notes that within the proposed scheme much of the existing depot would remain unchanged from the current situation. Therefore, the noise assessment considered and focussed on the changes in activities at the site during weekdays, Saturday mornings and Bank Holidays in connection with the operation of the new aspects of the MBF and the associated increases in HGV movements.

188 In respect of current movements, RBBC collect MSW on Bank Holidays at the present time and would look to continue this in future. Tandridge District Council do not normally collect MSW on Bank Holidays as they typically collect waste between Tuesdays and Fridays each week and the majority of bank holidays occur on Mondays. Therefore, the activity undertaken at the site on Monday Bank Holidays in future would only relate to RBBC vehicles which already tip at the site on these occasions. However, to present a robust consideration of the facility the applicant included activity associated with both RBBC and TDC RCV deliveries within the Bank Holiday assessment, which was considered to be an exaggerated worst case accounting for elevated RCV/HGV movements to the MBF which may not actually occur in practice.

189 Furthermore, the submitted noise assessment notes that waste collections do not normally take place on Saturdays and activity on site would be limited to site tidying and bulking up materials for transportation off site. It is proposed that this would remain the nature of activities to be undertaken on typical Saturday mornings for the majority of the year. However, there is a situation where following certain Bank Holiday shutdowns (Christmas, New Year’s day and Good Friday) catch-up collections are likely to be required meaning RCVs would be required to access the site on Saturday mornings. This would account for approximately 3 to 4 Saturdays a year and has been considered in the assessment as an atypical Saturday operation. The assessments undertaken covered the typical operational weekday and Saturday morning periods as well as atypical operations associated with bank holidays and catching up activities following missed collections on certain bank holidays.

190 The applicant sets out that an iterative approach was followed at all stages of the scheme’s design, such to ensure that noise was a key consideration and was suitably controlled. The applicant notes that work was undertaken to arrive at the final design presented looking at various layout options and mitigation strategies. The result of this was a layout incorporating a tunnelled access to the south of the MBT for the reason of controlling noise.

191 The assessments indicate that the noise levels predicted from the proposed development would mean that complaints are unlikely to occur. The applicant sets out that increases in ambient noise levels at public open spaces (golf course) in the area of the development would be negligible, and as such acceptable. Off-site increases in road traffic noise along the A23, resulting from the facility, were assessed to be negligible/no change, and as such acceptable. Given the above, it was concluded that as a result of the mitigation strategy to be employed, noise would be suitably controlled to within acceptable levels.
Officer Assessment

192 Discussions took place during the determination of this application, with the applicant arguing that a more flexible approach be taken to operational hours be allowed given the current Earlswood Depot serves both TDC and RBBC with each have differing collection rounds and timing. The CNC has considered the points made by the applicant, the details of the noise assessment and the baseline of current background noise levels. Taking all these factors into account the CNC has recommended suitable noise conditions to be attached. The noise limits set out in the condition may require further measures on site for the applicant/operator to comply but given the proximity of residential properties and the hours of operation including weekends, Officers agree with the CNC that restrictions are necessary in this case beyond the design features incorporated as part of this proposal such as the southern ‘acoustic’ tunnel and fast acting doors.

193 Officers therefore consider that, subject to the imposition of appropriate conditions, the proposed development complies with the Development Plan with regards to noise and vibration effects on neighbouring amenity and any impacts have been appropriately mitigated in accordance with Policy DC3 of the SWP 2008 and RBLP 2005 Policy EM3.

SURFACE WATER, FLOOD RISK AND CONTAMINATED LAND

194 Government policy on flooding is contained in part 10 ‘Meeting the challenge of climate change, flooding and coastal change’ of the NPPF (paragraphs 93 to 108) The aims of the planning policy on flood risk, as set out in the NPPF and the NPPF Technical Guidance are to ensure flood risk is taken into account in planning decisions and plan preparation; to avoid inappropriate development in areas at risk of flooding by directing development away from high flood risk areas; and where development is necessary making it safe without increasing flood risk elsewhere. Guidance on how the policy should be implemented is set out in the accompanying NPPF Technical Guidance.

195 The NPPF (paragraph103) states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, (informed by a site-specific flood risk assessment) it can be demonstrated that the development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems. Annex E of PPS10 sets out the geographical criteria, which should be utilised in testing the suitability of sites and areas for waste management facilities, which includes protection of water resources. PPS10 also recognises that in the determination of planning proposals, planning authorities should concern themselves with whether the development is an acceptable use of the land and not with the control of pollution prevention processes. Considerations will include the proximity of vulnerable surface and groundwater. The suitability of locations subject to flooding will also need particular care.

196 SWP 2008 Policy DC3 (General Considerations) states that planning permissions for waste related development will be granted provided it can be demonstrated by the provision of appropriate information to support a planning application that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land, infrastructure and resources. The information supporting the planning application must include, where relevant to a development proposal, assessment of: the contamination of ground and surface water; the drainage of the site and adjoining land and the risk of flooding; and the groundwater conditions and the hydrogeology of the locality. Where necessary, appropriate mitigation should be identified so as to minimise or avoid any material adverse impact and compensate for any loss.
R&BLP 2005 Policy UT4 states that new development and land raising will not normally be permitted in areas at risk from flooding. Appropriate flood protection and mitigation measures will generally be required as part of development in areas at risk from flooding.

**Site Investigation / Land Contamination**

The site and the immediate area to the west have had a long history associated with the irrigation, drainage and treatment of sewage waste (c.1870). The applicant notes that whilst these processes continue to the west under current operators Thames Water, the Site was developed for the purpose of waste incineration during the 1960’s. The incineration facilities were demolished during the early 1990’s and the site subsequently used for the activities which continue to the present day.

Following a preliminary risk assessment carried out, the applicant’s specialist consultants carried out a Phase 2 intrusive investigation in order to develop a more comprehensive conceptual ground model of the site. This detailed the characteristic ground conditions and elements of the surrounding environment and has assisted with identifying the potential contaminants of contamination, the potential receptors of the contamination and the potential pathways between them. The applicant submits that the results of the risk assessments indicated that there is no significant source of contaminants present in the soil at the site in relation to human health, other than from asbestos. Three out of the seven samples of Made Ground tested have asbestos present (one sample for the lower risk chrysotile and two for the higher risk form of amosite). Inhalation of asbestos can cause severe consequences to the potential on site receptors (site staff and construction workers). The Made Ground would be penetrated as part of the proposed works but there is currently insufficient information to fully assess the risk during construction. When the development is complete almost the whole site would be covered in hard standing and this would break the pathway between asbestos in the Made Ground and receptors. Therefore the main risk from asbestos associated with this development is to construction workers and people on the adjacent sites during the groundworks stages of the development. Further assessment and investigation for asbestos is therefore required.

The applicant sets out that there would be no risk to groundwater in aquifers at depth below the site due to the thickness of the underlying Weald Clay and that it is classified as unproductive strata. The risk to surface waters was been assessed through sampling and testing of the groundwater within the Made Ground and comparing the concentrations to appropriate screening criteria. There were exceedences of the criteria for a number of metals, sulphate, chloride, ammonia and also benzo(ghi)perylene on one sample. In general the exceedences of the various thresholds are relatively small and do not warrant remediation as it was considered that the quality of water recorded within the site would not be significantly detrimental to nearby controlled surface waters. In addition to this the proposed development would increase the amount of hard standing in the area (especially the area to the west of the CRC site). This would decrease infiltration rates into the ground and therefore reduce the leaching of onsite contaminants and potentially reduce groundwater flows rates also with a reduction in levels of perched groundwater on site. As a result of this it was assessed that no mitigation is required to groundwater at the site as part of the development as the current groundwater conditions do not pose a significant risk to controlled waters.

The applicant sets out that concentrations of a number of metals are potentially phytotoxic and would therefore be detrimental to the growth of some types of plants and trees. The majority of the proposed development is anticipated to comprise hard standing, and therefore phytotoxicity would not of concern to the development. Phytotoxicity would only need to be addressed if any areas of tree planting or soft landscaping are created. In this instance clean soil would need to be imported for soft landscaping areas and surrounding tree rooting zones. Based on an assessment of the soil and groundwater data, it was anticipated that no special precautions are required for the design and installation of water supply pipes due to hydrocarbons and other potential contaminants. However, due to the
presence of asbestos in the Made Ground it is proposed that all service trenches are backfilled with clean asbestos free materials.

202 Based on the ground gas monitoring data, the applicant sets out that no special precautions are required due to ground gases in the development of the land to the west of the CRC site although any buildings in this area would still require basic protection measures due to radon. However the main building in the area of the council depot would require ground gas protection measures.

**Email Dated 28 November 2013 from SITA UK**

203 With regard to gas protection measures, the applicant confirmed that all buildings on site would incorporate gas protection measures that are compliant with (but not exclusive to) the requirements of Characteristic Situation 3 (CS3) as set out in Tables 2 and 3 of BS8485:2007. The applicant noted that they would make this a requirement of contracts with their construction contractor.

**Proposed Drainage**

204 The topography of the site consists of a gentle slope from north to south which performs as an informal control of surface water into the drainage system. Surface water runoff from the site’s road surfaces, car parks and bulking bay area currently collects into the existing drainage system via a fuel/oil separator into an underground attenuation tank located under the site’s existing bulking area. The flow of water discharged from the tank is controlled using a Hydro Brake, through an outfall pipe and into Earlswood Brook approximately 100m south of the site. The existing surface water system currently draining the fleet parking area would be utilised where practical and connected to the new surface water system which would be installed to drain both paved and roof areas serving the developed MBF site.

205 The new surface water system would drain the following areas: The paved area in front of the proposed external bulking bays; The roof area of the MBF; The access road around the MBF building; The roof area of the RBBC welfare unit. Suitably sized pipes would convey the flows southwards from each separate system, prior to discharge via the existing outfall. The location of the attenuation storage has not been determined at this stage however it is assumed that they would be located in an area to the south of each network. Roof runoff from the external bulk bays to is to discharge to the fire fighting storage tank preferably via gravity. Overflow from the tank is to discharge to the new surface water system. A new rainwater harvesting tank, located west end of the RBBC Welfare and admin building would collect flows from the roof runoff. This is to be sized appropriately for the flushing of the four W/C’s within the building. Overflow from this system is to be connected to the new surface water system. A new foul system is to be designed to drain the following buildings:-

- RBBC Welfare and Admin Unit.
- SITAs Welfare and Admin building.
- 1 bay of the MBF building to collect leachate discharging to the rear of the bay (to be used for the storage of food waste).
- The internal area of the MBF Building via a central spine drain to collect wash down water.
- Internals of 4 of the external bulk bay units to collect leachate discharging to the rear of the bays to avoid contamination with the surface water system.
The foul system is to collect flows from these areas and convey by gravity via suitably sized pipe work round the northern perimeter of the CRC site and connect in to the existing foul system. It is presumed based upon the current topographical data that the proposed foul system can drain by gravity into the existing system. This would need to be confirmed at final detailed design and is dependent upon finished floor/slab levels of the site.

Submitted Flood Risk Assessment (FRA)

The main river catchment within the area is that of Earlswood Brook. Earlswood Brook is a ‘Main River’ and is maintained by the Environment Agency. Earlswood brook flows in a westerly direction approximately 85m south from the site. The site is situated within Flood Zone 1 and is therefore considered to have a very low probability of flooding with a 1 in 1000 or greater annual probability of river flooding (<0.1%) in any year is not considered to be at flood risk from any fluvial sources as described above. A surface water management strategy for the proposed development has been developed as part of a FRA to manage and reduce the flood risk posed by the surface water runoff from the site. Surface water from hardstanding areas would pass through an interceptor prior to controlled discharge to watercourse. NPPF Technical Guidance states climate change for 2055-2085 is +20%, and 2085-2115 is +30% rainfall. Based on the type of development proposed, a +20% addition in rainfall for climate change has been applied as the lifetime of the development would not exceed 2085.

The surface water runoff from the site in this assessment has been attenuated to the corresponding 1 in 1 year existing surface water runoff rate for all events up to and including the 1 in 100 year (+20%) rainfall events. Surface water runoff would be directed to the drainage system through drainage gullies located around the perimeter of the buildings and through contouring of the hardstanding areas and via an interceptor prior to controlled discharge off site. The attenuation volume required to reduce the post-application surface water runoff from the site to the existing 1 in 1 year calculated runoff rates. This is up to the 100 year (+20%) rainfall event and assuming no infiltration losses to the ground (e.g. through the use of a pond, tank). The attenuation volume required to restrict runoff to the existing 1 in 1 year (100% annual probability) runoff rate has been determined. Whilst there would be no runoff rate/attenuation volume changes expected within the CRC area (given there are no changes in development and that CRC falls outside the site development boundary), indicative runoff rates/storage volumes have been included alongside the RBBC and MBF calculation to show an appreciation of expected discharge rates into Earlswood Brook and demonstrate that the wider development would not impact flood risk.

Officer Assessment

In respect of flood risk and drainage issues, the County Geotechnical Consultant (CGC) advises that it is necessary for the CPA to retain oversight of the proposed drainage systems via the imposition of a planning condition because although the CGC confirms that the information presented in the Flood Risk Assessment is satisfactory it is still presented as a ‘strategy’. In particular, the CGC notes the FRA’s statement that: ‘A surface water management strategy for the proposed development has been developed as part of a FRA to manage and reduce the flood risk posed by the surface water runoff from the site’. The CGC sets out that the information in the FRA does not include the detailed design of the pipe network(s), the storage attenuation volume calculation is not related to Ordnance Survey datum and there are no details of the nature, location and detailed dimensions/levels of the underground attenuation storage, and that there are no level details of the existing outfall arrangements provided.
210 The CGC advises that given the above uncertainty, it is normal practice for a drainage condition to be imposed requiring the design details to be submitted to a sufficient level of detail for it to be demonstrated that the system that would function as the strategy proposes, complies with the relevant design standards and can be maintained satisfactorily. The County Geotechnical Consultant confirms that the submitted FRA is sufficient to comply with the requirements of the NPPF and the NPPF Guidance Notes.

211 In respect of the site investigation work undertaken, the CGC states that on the basis that the site is very low priority on the R&BBC inspection list, and that they have no major concerns, and that there would be no intrusive works at all on the northern part of the site that has not been subject to contaminated land assessment by the applicant, the CGC advises that it is not necessary for the applicant to carry out any further ground investigation. The work undertaken by the applicant is therefore sufficient subject to appropriate conditions being attached to any planning permission.

212 Officers therefore consider that the application complies with the NPPF 2012 and SWP 2008 Policy DC3 in respect of surface water and flood risk and potential land contamination, subject to any planning permission including appropriate conditions.

ECOLOGY & NATURE CONSERVATION

213 The requirement for planning to contribute to “conserving and enhancing the natural environment” is included in the 12 core planning principles set out in the NPPF, with specific policy with regard to the protection of protected species and habitats set out within part 11 ‘Conserving and enhancing the natural environment’ (policies 109 to 125). The NPPF looks to the planning system to “minimise impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure.” NPPF Policy 165 states that planning policies and decisions should be based on up-to-date information about the natural environment.

214 (Saved) Policy Pc2C of the Reigate and Banstead Local Plan First Alteration 2005 states that development within or adjoining SNCI’s will only be permitted if it does not materially harm the nature conservation value or wildlife interests of the site. The enhancement of sites and features which contribute to the local diversity and nature conservation interest of an area including trees, woodland, hedgerows and other forms of wildlife corridor is also protected by (saved) Policy Pc2G of the Reigate and Banstead Local Plan First Alteration 2005. Earlswood Common, located to the north of the application site, is a Local Nature Reserve (LNR) and also a Site of Nature Conservation Interest (SNCI).

215 The applicant has undertaken the following surveys / reports on this site:-

- Great Crested Newt Survey, May 2011
- A walkover survey consisting of a re-check of habitat condition and protected species audit was undertaken on 7th May 2013.
216 The applicant sets out that no significant change was noted to the habitat recorded on the site by Thompson Ecology in May 2011. Some limited vegetation clearance to facilitate site testing has occurred in the parcel of land on the south west of the site. At the time of the survey this parcel was predominantly bare earth. Other than this minor change affecting approximately 0.06 ha, there has been no apparent change to the site habitat. No additional sightings of protected species or secondary evidence of protected species were found. A small empty hut on the western edge of the site was devoid of any signs of bat entrance and is not of a construction type that is likely to be used by bats for roosting. Common bird species were observed around the site and are most likely nesting in tall ruderal vegetation, scrub and trees on site. No badger setts were located.

217 The applicant argues that the only direct impact expected from construction is a loss of vegetation supporting breeding birds and invertebrates. Mitigation measures to be employed would be retention of significant trees on the boundaries; retention of blackthorn wherever possible as a butterfly food-plant; new planting of native species and the erection of bird boxes; and restriction of vegetation clearance out of bird nesting season.

218 Officers note the comment of the County Ecologist, Surrey Wildlife Trust and that Natural England raise no objection to this proposal. Officers consider that the proposal would not conflict with NPPF, Surrey Waste Plan 2008 policies DC2 and DC3 or Reigate and Banstead Local Plan First Alteration (saved) policies Pc2D and Pc2G in respect of ecological and nature conservation issues subject to the securing of a 20 year LEMP and appropriate conditions.

LIGHTING

219 The NPPF 2012 states at paragraph 125 that by encouraging good design, planning decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. SWP 2008 Policy DC3 states that planning applications should assess any adverse effects on neighbouring amenity including glare and identify any appropriate mitigation.

220 The applicant sets out that the priority to the external lighting design was to minimise the number of luminaires and columns, ensuring the energy consumption of the new installations were kept to a minimum, and also that the luminaire positions would not obstruct or become problematic for the vehicles using the site. Use of the site’s existing LED technology was considered for the proposed development however a lighting assessment undertaken for the project determined that their use would cause excessive amounts of light pollution (known as sky glow) due to the large quantity of head columns that would be required to sufficiently illuminate large open areas. As a result, the proposed development intends to generally use Metal Halide lighting in the new areas which will cause minimal light pollution. The lighting assessment identified that within the site where the new fleet parking area is proposed, a number of existing older type column luminaires are located on the existing fence line which runs from east to west through this area. The columns would be removed in this area as their positions clash with the new site layout, and the technology and optical diffusers used contribute to upward sky glow and poor colour rendering.

221 The applicant sets out that the lighting strategy would retain and reposition these existing luminaires within the site, enhancing the lighting scheme within the areas they have been relocated to. To rationalise the lighting scheme across the site and avoid a mismatch of luminaire types within the new areas, the LED columns would be relocated to the existing northern depot car park and MOT bay areas. For the areas where higher illuminance levels are required the metal halide luminaires would provide an efficient source of illumination, with optical control to allow larger areas to be illuminated from a distance, without directly contributing to upward sky glow. To avoid clashes and not create obstructions within the vehicular routes of the site, the luminaires generally would be positioned to the edges of the spaces or utilise building mounted positions creating clear routes for the vehicles.
Notwithstanding the above details set out by the applicant, the County Lighting Consultant (CLC) confirms that he has not received sufficient information concerning the proposed relocated lighting and advises that this information should be sought prior to their relocation; by way of a pre-commencement conditions. Specifically, the CLC advises that although the information submitted regarding the new lighting complies with recommendations, it does not include information for the relocated Gemma LED lighting. Officers do not consider that the lack of information on relocated lighting would be a sufficient reason to refuse this application and that a condition can be relied upon in this case and that the application accords with the NPPF 2012 and SWP 2008 Policy DC3 in terms of impact from lighting.

ARCHAEOLOGY

The applicant submits that there are no recorded or potential heritage assets recorded within the proposed development site and that it is highly unlikely that any currently unrecorded buried archaeological remains survive within the proposed development site, due to previous intrusive groundworks associated with the late 19th and 20th-century sewage farm and waste facility and depot within the site. As such, the applicant argues that the development of the site for the expansion of the site to provide a new waste management facility would not be contrary to national or local planning guidance regarding archaeological remains, and would not result in harm to any heritage assets.

The County Archaeologist notes that the application site is very large - over the 0.4 hectares which is recommended for archaeological assessment and possibly evaluation under policy Pc8 of the Reigate and Banstead Local Plan 2005. In accordance with national and local policy the applicants have commissioned a desk based archaeological assessment from Cotswold Archaeology to support the planning application. The assessment has considered all currently available sources, including the Surrey Historic Environment Record, historic maps and documentary sources to assess the potential for significant remains to be present. The document concludes that there are no designated or non-designated heritage assets within the site and that previous development, in particular the use of the site as a sewage works, has removed any potential for buried archaeological deposits to be present. The County Archaeologist therefore agrees with the conclusions of the assessment and considers that the requirement for assessment has been satisfied by the desk based report and that there is no need for any further archaeological works as a consequence of this proposal.

Other Issues

With reference to the other points raised in representations, Officers judge that mitigation measures to deal with potential environmental impacts have been adequately considered in the determination of this application, with conditions recommended to secure appropriate controls for both the construction and operational phase of the proposed development. Likewise, the visual impact of the proposed development and use of materials in the scheme’s design, scale of traffic generation and capacity of the surrounding road network, and the potential for dust / odour / noise has been considered in the relevant sections of this report; technical consultees have raised no objections to this development subject to appropriate conditions and informatives.

In respect of representations referring to alternative industrial sites or other private commercial facilities being available to take the MSW that would be received at this site, Officers judge that the applicant’s submitted ASA has robustly demonstrated that no better suitable alternative site is available, particularly considering how proximate the application site is to the source of waste arisings it would receive from RBBC and TDC. Lastly, with reference to concerns that the proposed development would devalue property and that the proposed development would be an expensive project to build, these points are not considered to be material planning considerations.
GREEN BELT

**Surrey Waste Plan 2008**
Policy CW5 Location of Waste Facilities
Policy CW6 Development in the Green Belt

**Reigate & Banstead Local Plan First Alteration 2005**
(saved) Policy CO1 – Setting and Maintenance of the Green Belt

227 Protecting Green Belts around main urban areas is included in the core planning principles of the NPPF. The NPPF states at paragraph 87 that “inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances” and paragraph 88 goes on to state that when considering “any planning application” authorities should ensure that “substantial weight is given to any harm to the Green Belt” and that “very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

228 Paragraph 89 of the NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:-

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

229 The Surrey Waste Plan 2008 (SWP 2008) includes: Core Strategy; Waste Development; and Waste Development Control policies. The Core Strategy explains the County Council’s approach to the location of waste management facilities following the requirements of PPS10. Paragraph B13 of the Core Strategy indicates that due to limited opportunities for waste management facilities in urban areas and on industrial land, land beyond urban areas needs to be considered. In considering land beyond urban areas, priority will be given to mineral workings and land in waste management use, the re-use of previously developed, contaminated, derelict or disturbed land, redundant farm buildings and their curtilages, before greenfield and Green Belt sites.

230 SWP 2008 paragraph B14 states that “Protection of the Green Belt will continue, but the locational needs of some waste management facilities, together with the wider environmental and economic benefits of sustainable waste management, will be factors taken into account in assessing very special circumstances in determining proposals for waste development in the Green Belt.”
231

SWP 2008 Policy CW6 seeks to ensure that, whilst making provision exceptionally for necessary waste management development, the Green Belt serves its proper purpose (paragraph B44). The policy states there will be a presumption against inappropriate waste related development in the Green Belt except in very special circumstances and that: “Very special circumstances to justify inappropriate development of waste management facilities in the Green Belt will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.” Policy CW6 goes on to state that the following considerations may contribute to very special circumstances:

(i) the lack of suitable non-Green Belt sites
(ii) the need to find locations well related to the source of waste arisings;
(iii) the characteristics of the site; and
(iv) the wider environmental and economic benefits of sustainable waste management, including the need for a range of sites.

232

RBLP 2005 Policy CO1 states that in order to preserve the openness of the Green Belt, as defined on the Proposals Map, planning permission will not be granted for development that is inappropriate to the Green Belt unless justified by very special circumstances.

Harm to the Green Belt and Other Harm

233

Waste development is not within the categories of development recognised in the NPPF to be appropriate in the Green Belt; and therefore the application proposal involving the use of the land for waste development clearly constitutes inappropriate development in the Green Belt and will cause harm to the Green Belt by reason of inappropriateness. Over 70% of land in Surrey is in the Green Belt and the use of land in the Green Belt for waste related development is recognised in national and development plan policy, as mentioned above. Planning applications are determined on the basis of development plan policies and consideration of issues such as: the location of the site, its capability of supporting the infrastructure proposed, and whether it would operate without causing harm to the Green Belt, local amenity and local environmental interests. Where there is harm to the Green Belt and other harm, it has to be demonstrated that very special circumstances exist to clearly outweigh them.

234

The built waste management development proposed and its subsequent use and operation of the land constitute inappropriate development in the Green Belt that is by definition harmful. The scale and extent of the development proposed are also to be judged in terms of their physical impact of openness, and the fundamental aim of keeping Green Belt permanently open. The purposes of including land in the Green Belt should also be considered. Specifically, it would not assist in safeguarding the countryside from encroachment (NPPF paragraph 80), as it would encroach into the open countryside. Therefore, the elements of the proposal are to be judged in terms of safeguarding the countryside from encroachment.

235

In considering the impact on openness the starting point in this process would be the impact of the proposal on the fundamental characteristic of the Green Belt, namely its openness. Substantial weight should also be applied to other aspects of harm to the Green Belt where these harms relate to either the purposes of the Green Belt, the objectives of the Green Belt or the visual amenity of the Green Belt. Weight should also be attributed to other (non-Green Belt) harm caused by the development, with the weight attributed depending on the scale and significance of the harm identified. Against this assessment of harm, one must then assess both the mitigation of that harm and the need for, and/or benefits of the proposal. Once all the requisite elements have been assessed, there must be a judgment made as to whether the factors demonstrate the existence of very special circumstances clearly outweighing all harm caused.
236 The applicant refers to Paragraph 89 of the NPPF 2012 and argues that the development proposed involves the redevelopment of ‘previously developed’ land and represents limited infilling since the site is located adjacent to an existing waste management facility and an existing highways depot and therefore satisfies this criterion. The applicant argues that the site is an existing waste management and industrial site and is allocated for additional waste management activity in the Surrey Waste Plan 2008, and therefore considers that the proposed development would not have a significant impact on the original purpose of including the site within the Green Belt. The applicant therefore doubts whether the proposed development should be considered inappropriate development at all.

237 Officers do not agree with the applicant’s conclusion that the site on which the MBF would be sited is ‘previously developed’. Appendix 2 of the NPPF 2012 states that previously developed land excludes: “land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.” As can be seen in Figure 4 attached to this report, the site on which the MBF would be located is open land; any evidence of a previous use has clearly disappeared and this part of the application site is therefore undeveloped land in the Green Belt. Nevertheless, Officers note that the area of undeveloped land has been identified as suitable for waste related development in the adopted SWP 2008 and the development of such undeveloped land has therefore been deemed sound by an Inspector, subject to Key Development Criteria relating to the site’s Green Belt setting. Notwithstanding their (in Officer’s view erroneous) interpretation of Green Belt policy on ‘inappropriateness’, the applicants have nevertheless submitted factors considered by them to demonstrate very special circumstances to outweigh harm to the Green Belt caused.

238 In accordance with the above policies, harm to the Green Belt is an important factor in determining the acceptability of this application. In order to assess this application in terms of Green Belt planning policy, it is necessary to first establish the nature and extent of the harm caused. The constituent elements of the new large-scale MBF building are:-

- Main building with a volume of approximately 30,500m³ and a maximum height of 12.02 metres;
- Acoustic tunnel with a volume of approximately 5587m³ and a maximum height of 8 metres;
- Loading tunnel with a volume of approximately 1027m³ and a maximum height of 10 metres;
- Attached Office/Welfare building with a volume of approximately 388m³ and a maximum height of 6.65 metres;
- Plant room with a volume of approximately 85m³ and a maximum height of 4 metres.
- There is also a small store located, i.e. fully enclosed, within the acoustic tunnel and thus with no impact on openness.

239 Although the undeveloped land on which the MBF would be located is not currently visible from the wider area, it is open land in the Green Belt. In terms of the site’s KDC on Green Belt, and the proposal demonstrating that it seeks to manage the impact on openness, the CLO is content with the landscape and visual mitigation measurements including planting on the boundaries of the site area and the use of timber cladding for more prominent sections of the MBF building. Notwithstanding that visual impact would likely lessen over time as boundary planting matured, the built form would create permanent harm to the openness of the Green Belt. The MBF building would have a combined volume of approximately 37,587m³ and would be 12.02 metres high at its ridge and this large-scale building would create substantial harm to Green Belt openness, with the structure visible...
from both close-up and distant views, replacing an open undeveloped site and removing existing vegetation and some young trees.

240 In respect of the triangular parcel of land owned by Thames Water, a large area of hard surfacing would be laid for loading/sheeting of vehicles and 4 external bulking bays would be constructed with a volume of approximately 3123m$^3$ and a maximum height of 10.01m. Thames Water’s land is an undeveloped area, which is now fence-off as shown in Figure 6 attached to this report, and is open land in the Green Belt. The development of this part of the application site, particularly the large bulking bays at 10.01 metres in height, would create harm to the openness of the Green Belt.

241 In respect of the buildings proposed on the site of the existing bulking bays (see Figure 5 attached to this report), Officers consider that these would have a lesser impact on the Green Belt though would still create harm to openness when built. Officers note that the existing bulking bays are approximately 9 metres high and have a volume of approximately 3051m$^3$ and that this would be replaced by the RBBC Welfare & Admin building and the SITA Weighbridge Office, which together would have a smaller volume of approximately 1255m$^3$ and not exceed 5 metres in height.

242 Lastly, in respect of the proposed reuse store which has a volume of approximately 130m$^3$, with a maximum height of 3.63m, Officers consider that this too would create harm to openness. The existing Earlswood Depot is an established waste management facility, although it is still within the Green Belt, and Officers recommend that permitted development rights be removed for new structures in order to control further built structures at this site.

243 Given the above permanent built development, Officer’s therefore consider that harm would be caused by virtue of the inappropriate nature of waste development and the harm to openness from the physical development proposed.

Other Harm

244 As set out earlier in this Report, Officers are satisfied that through the use of appropriate conditions, any impact (such as from noise, odour, dust, lighting) can be adequately mitigated. Officers do not therefore consider that any harm, other than through the inappropriateness of the waste development and harm to openness of the Green Belt, would be caused by the proposed development.

245 It is accepted that the proposed waste management development does not fall within any of the categories of appropriate development in the NPPF, so is therefore deemed to be ‘inappropriate’ development in the Green Belt; and Officers have therefore taken account of the fact that the proposal is harmful to the Green Belt by definition. The proposed development would cause harm to the Green Belt, not only by reason of its inappropriateness but also through harm to the openness of the Green Belt through the construction of a large MBF on undeveloped land and other associated infrastructure. Although the visual impact of the proposed new development is not considered by Officers to be so adverse as to warrant refusal, subject to appropriate landscaping conditions, such harm to the Green Belt must be clearly outweighed by very special circumstances.

VERY SPECIAL CIRCUMSTANCES

246 The demonstration of very special circumstances (VSC) is a fundamental factor in determining the acceptability of the application given that the proposed development is inappropriate development in the Green Belt and in view of the harm to openness. The applicant has put forward a number of factors, which it considers are very special circumstances that outweigh the harm to the Green Belt by reason of inappropriateness and harm to openness. For the purposes of this report the factors potentially capable in Officers’ view of contributing to ‘very special circumstances’ have been grouped together
below and considered under the four considerations identified in SWP 2008 Policy CW6 that may contribute to very special circumstances.

Lack of Suitable Non Green Belt Sites

247 The applicant sets out that an Alternative Site Assessment (ASA) has been carried out to ascertain the availability of suitable non-Green Belt sites and that this concluded that there are no suitable non-Green Belt sites available that could feasibly be used for the development proposed. The ASA was also noted by the PS to conclude that no alternative site within the Green Belt was any more suitable for accommodating the development proposal than the Earlswood site. After consideration of the applicant’s submitted ASA, Officers judge that the applicant has proven that there is a lack of suitable non Green Belt sites and the application would accord SWP 2008 Policy CW6 on this basis.

The Need to Find Locations Well Related to the Source of Waste Arisings

248 The applicant sets out that the site the proposed development would receive material from the Reigate and Banstead and Tandridge administrative areas, which extends over a significant geographic area and is now being served by new kerbside collection rounds that have increased the dry recyclate being collected at the kerbside. As such, the applicant sets out that a site located centrally within the two districts is most desirable. The applicant argues that the Earlswood site is both well related to the waste arisings (being kerbside locations throughout Reigate and Banstead Borough and Tandridge District) and to the existing RCV fleet parking facility on the site itself. The applicant also sets out that the application site is centrally located within the two districts and, as set out in the Transport Assessment submitted in support of their planning application, would be very well connected to the transport network.

249 As noted above, Officers consider that the application site complies with SWP 2008 Policy CW5 given its direct connection to the A23. Taking into account the submitted transportation assessment and the comments of the CHA, Officers consider the application would accord SWP 2008 Policy CW6. Officers judge that it has been robustly demonstrated that the site and proposed development would be well related to the source of waste arisings it would handle.

The Characteristics of the Site

250 The applicant sets out that the site is characterised by the existing operational waste management, industrial and Borough Council facilities on the site itself and adjoining land, and that the site itself is an active waste management site, albeit at a reduced scale to that which is currently proposed. The applicant argues that the site and its immediate surrounds are not a part of the Green Belt that has been maintained in open land given the historic land use and as such it is not considered the integrity or openness of the Green Belt would be compromised by the proposed development on the subject site. However, Officers disagree with the applicant on this point and note that Paragraph 79 of the NPPF 2012 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

251 The applicant also sets out that land uses on immediately adjoining land include the Thames Water Sewage Treatment Works to the west of the site and the Surrey County Council Community Recycling Centre (CRC) to the east of the site, and that these existing uses on the site and immediately adjoining land have created a waste management and industrial character. The applicant also sets out that a number of specific locational needs apply in the consideration of the proposed MBF and that these are material planning considerations unique to this waste management, including:

- The requirement to minimise the distance travelled by Refuse Collection Vehicles (RCVs) from their current fleet depot on land at Earlswood Depot;
• The requirement to minimise the distance travelled by the RCVs to the MBF once they have undertaken their kerbside collection round;

• The existing waste management operations already being undertaken at the Earlswood site; and

• The need to provide a sustainable and preferably self-sufficient waste management solution for MSW within Reigate and Banstead Borough and Tandridge District.

252 Following consideration of the above factors, Officers consider that the site as here proposed has certain characteristics that mark it out as potentially capable of making a contribution to meeting the need within the County for development to provide for sustainable waste management. Officer’s judgement on this is made notwithstanding the discrepancy in the applicant’s submission of viewing a substantial part of the site as ‘previously developed’ when in Officer’s view it is not.

The wider environmental and economic benefits of sustainable waste management, including the need for a range of sites

253 The applicant sets out that the proposed development would ensure more material is diverted up the Waste Hierarchy away from landfill and unsegregated recovery and that there are clear environmental and economic benefits to such an approach, as supported by the Waste Management Strategy, in particular Policy 4 and associated Actions A18-32 of the Waste Management Strategy which seek to meet and exceed household recycling targets. The applicant argues that the location of the site is central to the waste collection rounds it serves, also offers clear environmental and economic benefits, and is supported by Policy 1 of the Waste Management Strategy and its associated actions which seek to achieve net self-sufficiency for waste management within Surrey.

254 Following consideration of these factors, Officers consider that the proposal would assist the County in achieving wider environmental and economic benefits of sustainable waste management, including the need for a range of sites.

Conclusion

255 The proposal is inappropriate development in the Green Belt and is therefore harmful to it by definition; and Government places substantial importance on the protection of the Green Belt from the effects of inappropriate development. It would have an impact on the openness of this part of the Green Belt primarily due to a large MBF building but also to the extension of the operational waste management site south from the existing Depot and westwards from the existing CRC, including into an open parcel of land previously owned by Thames Water. The site on which the MBF would be situated is undeveloped land and not visible from public vistas, though extreme southern end of the application site is close to a boundary with residential properties on Maple Road.

256 As noted above, although the visual impact of the new MBF and other elements of the proposed development are not consider sufficient to warrant a refusal on its own, the harm to the Green Belt posed from inappropriateness and greater impact on Green Belt openness from the built parts of the proposal would however run counter to one of the purposes of including land in the Green Belt, safeguarding the countryside from encroachment.
In terms of uses of the land, only the retention and strengthening of existing boundary vegetation (southern boundary) could secure some (albeit minor) nature conservation interest. The impact of the proposal on the visual amenities of the Green Belt is not considered a sufficient reason to warrant refusal on its own given the site would be substantially screened and following the maturation of peripheral planting, which could be secured by condition were Officers minded to approve this application. However, visual amenity and openess of the Green Belt are separate factors. The key consideration with the first factor is whether visual amenity would be so adversely affected as to warrant refusal, which Officers do not consider to be the case. The key issue with the second factor is whether there would be a greater impact on the openness of the Green Belt than the built development existing on the site; Officers judge that there would be a greater impact on openness.

Taking account of the above, Officers consider that the factors submitted by the applicant judged cumulatively would constitute very special circumstances that clearly outweigh the harm to the Green Belt by reason of inappropriateness and harm to openness and that these justify the grant of planning permission. Officers consider that these factors combined are such that very special circumstances have been demonstrated as required by SWP 2008 Policy CW6. Officers consider that the factors noted by the applicant clearly outweigh the harm resulting from the proposal, therefore an exception to Green Belt policy in the NPPF 2012, SWP 2008 Policy CW6 and Reigate & Banstead Policy CO1 should be made.

Were Members minded to permit this application subject to recommended conditions, it would need to be referred to the National Planning Casework Unit as a ‘Departure’ from the Development Plan, and the final decision would therefore rest with the Secretary of State.

HUMAN RIGHTS IMPLICATIONS

It is acknowledged that there would be an impact on the Green Belt caused by inappropriateness of the development and harm to openness, in addition impacts in respect of air quality including odour and dust, noise, traffic, landscape are acknowledged and have been assessed in the body of the report and mitigation provided; however the scale of such impacts is not considered sufficient to engage Article 8 or Article 1 of Protocol 1 and, if planning permission were to be granted, any impact is capable of being mitigated by the measures incorporated into the application proposal, possible planning conditions and the mitigation measures and controls available through the Environmental Permitting regime. As such, this proposal is not considered to interfere with any Convention right.

CONCLUSION

The proposal needs to be assessed and considered as a new waste proposal within the Metropolitan Green Belt where there is a presumption against inappropriate development. Key issues in determining this application include compliance with the Development Plan, the protection of the Metropolitan Green Belt, the suitability of the site for waste development, transport and transportation, and the potential impact on local residential, environmental and amenity interests. The proposal constitutes inappropriate development in the Green Belt and would cause harm to the Green Belt by reason of inappropriateness.
and other harm as identified in this report. It needs to be demonstrated that very special circumstances exist to outweigh the harm to the Green Belt and any other harm.

Factors which may contribute to ‘very special circumstances’ to allow inappropriate development include need for the proposal and a lack of alternative sites outside of the Green Belt. At the heart of the NPPF 2012 is a presumption in favour of sustainable development and the NPPF makes clear that this has three dimensions: economic, social and environmental. Given the robust Alternative Site Assessment, sufficiently clear need argument for both the size of new buildings proposed and the appropriateness of the location to receive the predicted waste, Officers judge that very special circumstances have been demonstrated, and that the proposal would accord with the NPPF 2012, SWP 2008 Policy CW6 and Reigate and Banstead Local Plan 2005 Policy CO1.

RECOMMENDATION

The recommendation is to PERMIT the application subject to the following conditions and referral to the National Planning Casework Unit as a departure from the Development Plan.

CONDITIONS

Approved Drawings

1. The development hereby permitted shall be carried out in accordance with the following approved plans and drawings:

<table>
<thead>
<tr>
<th>Drawing No</th>
<th>Title</th>
<th>Dated</th>
</tr>
</thead>
<tbody>
<tr>
<td>EWT01 Revision Q</td>
<td>Proposed Site layout</td>
<td>16-08-2013</td>
</tr>
<tr>
<td>EWT01.4 Revision K</td>
<td>MBF Plans</td>
<td>25-10-2013</td>
</tr>
<tr>
<td>EWT01.5 Revision B</td>
<td>Existing Site Layout</td>
<td>06-08-2013</td>
</tr>
<tr>
<td>EWT02 Revision J</td>
<td>MBF Elevations</td>
<td>25-10-2013</td>
</tr>
<tr>
<td>EWT02.1 Revision H</td>
<td>External Bulking Bays: Elevations</td>
<td>15-08-2013</td>
</tr>
<tr>
<td>EWT02.2 Revision E</td>
<td>RBBC Welfare Building: Elevations &amp; Section</td>
<td>15-08-2013</td>
</tr>
<tr>
<td>EWT02.4 Revision G</td>
<td>Weighbridge Office Elevations</td>
<td>15-08-2013</td>
</tr>
<tr>
<td>EWT02.5 Revision G</td>
<td>MBF Sections</td>
<td>15-08-2013</td>
</tr>
<tr>
<td>EWT02.6 Revision F</td>
<td>Site Sections: Proposed</td>
<td>15-08-2013</td>
</tr>
<tr>
<td>EWT03 Revision A</td>
<td>Landscape Proposals</td>
<td>July 2013</td>
</tr>
<tr>
<td>EWT04</td>
<td>Overall Proposed Drainage</td>
<td>August 2013</td>
</tr>
<tr>
<td>EWT04.1</td>
<td>Existing Drainage</td>
<td>August 2013</td>
</tr>
<tr>
<td>EWT04.2</td>
<td>Proposed Drainage RBBC Area</td>
<td>August 2012</td>
</tr>
<tr>
<td>EWT04.3</td>
<td>Proposed Drainage MBF Area</td>
<td>August 2012</td>
</tr>
<tr>
<td>EWT04.4</td>
<td>Drainage CRC Area</td>
<td>August 2012</td>
</tr>
<tr>
<td>EWT04.5</td>
<td>Existing Development Permeable Area</td>
<td>August 2013</td>
</tr>
<tr>
<td>EWT04.6</td>
<td>Proposed Development Permeable Area</td>
<td>August 2013</td>
</tr>
<tr>
<td>EWT05 Revision 3</td>
<td>External Lighting Layout and ILP Obtrusive Light Spill Analysis</td>
<td>21-08-2013</td>
</tr>
<tr>
<td>EWT05.1 Revision 3</td>
<td>External Lighting Layout and ILP Obtrusive Light Spill Analysis</td>
<td>21-08-2013</td>
</tr>
<tr>
<td>EWT05.2</td>
<td>External Lighting Layout and ILP Obtrusive Light Spill Analysis</td>
<td>21-08-2013</td>
</tr>
<tr>
<td>EWT06 Revision A</td>
<td>Pedestrian Routes</td>
<td>14-08-2013</td>
</tr>
<tr>
<td>EWT07</td>
<td>Site Location Plan</td>
<td>May 2013</td>
</tr>
<tr>
<td>EWT 07.1 Revision 2</td>
<td>Red Line Planning Boundary</td>
<td>August 2013</td>
</tr>
<tr>
<td>EWT08.1 Revision A</td>
<td>Tree Constraints Plan</td>
<td>August 2013</td>
</tr>
<tr>
<td>EWT08.2 Revision A</td>
<td>Tree Impact Plan</td>
<td>August 2013</td>
</tr>
</tbody>
</table>
Reason: To ensure the permission is implemented in accordance with the terms of the application and to enable the County Planning Authority to exercise planning control over the development so as to minimise its impact on the amenities of the local area and local environment in accordance with the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations.

Commencement

2. The development hereby permitted shall begin before the expiration of three years beginning with the date of this permission. The applicant shall notify the County Planning Authority in writing within seven working days of the commencement of development.

Reason: To accord with the provisions of Section 91 (1) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004 and to enable the County Planning Authority to control the development and monitor the site to ensure compliance with the planning permission.

Restriction of Permitted Development Rights

3. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development Order) 1995 (as amended) (or any order revoking and re-enacting that Order with or without modification),

4. (a) no buildings, fixed plant or machinery other than that hereby permitted shall be located on the site; and

(b) no fencing or external lighting other than that hereby permitted shall be erected or installed at the site of the development hereby permitted.

Reason: To enable the County Planning Authority to exercise control over the development hereby permitted and comply with Section 91 of the Town and Country Planning Act 1990 (as amended), the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations.

Operational Throughput

5. The site shall import no more than 110,000 tonnes of Municipal Solid Waste (MSW) per annum arising only in Reigate & Banstead Borough and Tandridge District. The operator shall maintain records of the tonnage of waste imported to the site, and where it arises, and shall make these records available to the County Planning Authority at any time upon request.

Reason: To ensure that the amount of waste imported to the site does not exceed the level upon which the transportation impact was assessed, to prevent the receipt of other waste types and from waste from other local authority areas, and to enable the County Planning Authority to exercise control over the development hereby permitted and

**Hours of Operation**

6. No lights shall be illuminated nor shall any operations or activities authorised or required by this permission be carried out outside the following hours: 0600 to 1830 hours Monday to Friday and Bank/Public Holidays; and 0600 to 1400 hours Saturday. There shall be no working on Sundays.

Reason: To enable the County Planning Authority to exercise control over the development hereby permitted and protect the amenities of local residents in accordance with the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations; and Reigate & Banstead Local Plan 2005 Policy EM3 – Design and Layout.

7. The visibility zones at the vehicular / pedestrian / cycle access to Horley Road shall be kept permanently clear of any obstruction over 1.05m high.

Reason: In the interest of the local environment and amenity and in order that the development should not prejudice highway safety nor cause inconvenience to other highway users to comply with the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations.

8. Space shall be laid out within the development hereby approved in accordance with the approved plans for vehicles to be parked, for the loading and unloading of vehicles and for all vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking, loading and unloading & turning areas shall be retained and maintained for their designated purposes.

Reason: In the interest of the local environment and amenity and in order that the development should not prejudice highway safety nor cause inconvenience to other highway users to comply with the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations.

**Construction Environmental Management Plan**

9. No development shall commence until a Construction Environmental Management Plan has been submitted to and approved in writing by the County Planning Authority. Only the approved details shall be implemented during the construction of the development. The Construction Environmental Management Plan shall include details of:-

(a) parking for vehicles of site personnel, operatives and visitors;

(b) loading and unloading of plant and materials;

(c) storage of plant and materials;

(d) programme of works (including measures for traffic management);

(e) HGV deliveries and hours of operation;

(f) vehicle routing;

(g) measures to prevent the deposit of materials on the highway;
(h) measures to prevent dust in addition to boundary air monitoring during works involving land which is suspected to be contaminated with Asbestos Containing Material; and

(i) measures to prevent noise.

Reason: In the interest of the local environment and amenity and in order that the development should not prejudice highway safety nor cause inconvenience to other highway users to comply with the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations.

10. The proposed Materials Bulking Facility shall not be operational unless and until the Staff Travel Statement and its measures have been implemented. The travel statement shall be permanently maintained and regularly updated.


Dust & Odour

11. Development shall not commence unless a Dust and Odour Management Plan has been submitted to and approved in writing by the County Planning Authority. The development shall be implemented strictly in accordance with the approved details, which shall be maintained and enforced permanently thereafter and shall include details of:-

- Keeping the bulk loading bay doors shut – this bay is used infrequently compared to the RCV entry and exit and thus there should be no operational impediment caused by keeping the doors shut;

- Automatic weather station being installed on site and how this data will be used and reported;

- All operations apart from within the external green waste loading bays to be carried out within the building; and

- No waste to be stored outside apart from green waste in the external bays, however green waste will not be stored for longer than 72 hours.

Reason: In the interest of the local environment and amenity and to comply with the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations.

Lighting

12. The development hereby permitted shall not commence unless a Detailed Lighting Scheme has been submitted to and approved in writing by the County Planning Authority. The detailed lighting scheme shall include the results of all new and relocated lighting, in order to evidence that all lighting conforms to recommendations for environmental zone E2 in the ILP document “Guidance Notes for the Reduction of Obtrusive Light GN01:2011.” At any time during the first 12 months of operation, the County Planning Authority shall be entitled to require the applicant to adjust or shield any light source that fails to conform to recommendations for environmental zone E2 in the ILP document “Guidance Notes for the Reduction of Obtrusive Light GN01:2011.”
Reason: To enable the County Planning Authority to exercise control over the development hereby permitted and protect the amenities of local residents in accordance with the National Planning Policy Framework 2012; Surrey Waste Plan 2008 Policy DC3 – General Considerations; and Reigate & Banstead Local Plan 2005 Policy EM3 – Design and Layout.

13. No external lighting shall operate between the hours of 10pm and 6am.

Reason: To enable the County Planning Authority to exercise control over the development hereby permitted and protect the amenities of local residents in accordance with the National Planning Policy Framework 2012; Surrey Waste Plan 2008 Policy DC3 – General Considerations; and Reigate & Banstead Local Plan 2005 Policy EM3 – Design and Layout.

Contaminated Land / Remediation

14. Prior to the commencement of the development hereby permitted, a detailed remediation and / or mitigation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be submitted to and approved in writing by the County Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

The approved remediation and / or mitigation scheme shall be carried out in accordance with its terms prior to the commencement of any development, other than that required to carry out remediation. The County Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Reason: To prevent pollution of the environment in accordance with the National Planning Policy Framework 2012 and Surrey Waste Plan Policy DC3 – General Considerations.

15. Following completion of measures identified in the approved remediation scheme required through Condition 13 above, a verification report that demonstrates the effectiveness of the remediation carried out shall be submitted to the County Planning Authority for approval in writing.

Reason: To prevent pollution of the environment in accordance with the National Planning Policy Framework 2012 and Surrey Waste Plan Policy DC3 – General Considerations.

16. In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it shall be submitted to and approved in writing by the County Planning Authority for written approval, including:-

i) a survey of the extent, scale and nature of the contamination;

ii) an assessment of the potential risks to previously identified receptors, and;

iii) an appraisal of remedial and mitigation options, and proposal of the appropriate risk option(s).

In accordance with DEFRA and Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11.'
Where remediation or mitigation is necessary to bring the ground to a condition suitable for the intended use or suitably reduce the risks to identified receptors (for example, human health), a detailed scheme, shall be submitted to the Local Planning Authority to ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. This shall include the scope of works to be undertaken, timetable of works, objectives, site management procedures and remediation criteria.

Following completion of measures identified in the approved remediation scheme for the unexpected contamination, a verification report shall be submitted to and approved in writing by the County Planning Authority.

Reason: To prevent pollution of the environment in accordance with the National Planning Policy Framework 2012 and Surrey Waste Plan Policy DC3 – General Considerations.

17. Prior to the commencement of the development hereby permitted, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed ground gas protection measures shall be submitted to and approved in writing by the County Planning Authority. Following completion of the measures identified in that scheme and following one year post-completion of development, an assessment of the long-term effectiveness of the proposed ground gas protection measures shall be prepared, including a review of the results of long-term monitoring and submitted to the County Planning Authority.

Reason: To prevent pollution of the environment in accordance with the National Planning Policy Framework 2012 and Surrey Waste Plan Policy DC3 – General Considerations.

Bird Hazard

18. Prior to the commencement of the development hereby permitted a Bird Hazard Management Plan shall be submitted to and approved in writing by the County Planning Authority. The submitted plan shall include details of:

Management of any flat/shallow pitched roofs and ledges on buildings within the site which may be attractive to nesting, roosting and “loafing” birds. The management plan shall comply with Advice Note 8 ‘Potential Bird Hazards from Building Design.’

The Bird Hazard Management Plan shall be implemented as approved, upon completion of the roofs and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: To minimise the attractiveness of the site to birds which could endanger the safe movement of aircraft and the operation of Gatwick Airport and Redhill Aerodrome to accord with Surrey Waste Plan 2008 Policy DC3 and Circular 01/03 - Safeguarding Aerodromes, Technical Sites and Military Explosives Strategy Areas.

Noise

19. Site attributable noise levels shall not exceed 40 LAeq for the period 0600 – 0730 Monday – Friday and before 0800 Saturdays and Bank/Public Holidays, and shall not exceed 52 LAeq for the remainder of daytime operational period, when measured at, or recalculated as at, 3.5m from the facade of any noise sensitive property at a height equivalent to a bedroom window up to 0730, and 1.5m during the daytime operational period.
The level of noise emitted from the site during construction shall not exceed 70 LAeq during any 30 minute period between 0800 to 1800 hours Monday to Friday and 0900 to 1300 hours on a Saturday measured at, or recalculated as at, a height of 1.2 m above ground level and 3.5 m from the facade of any residential property or other noise sensitive building that faces the site.

Reason: To ensure the minimum disturbance and to avoid nuisance to the locality to comply with the National Planning Policy Framework 2012; Surrey Waste Plan 2008 Policy DC3 - General Considerations; and Reigate & Banstead Local Plan 2005 Policy EM3 – Design and Layout.

20. Construction hours/days shall be only: Monday to Friday: 8am-6pm, Saturday: 9am-1pm, with no working on Sundays or Bank/Public Holidays.

Reason: To ensure the minimum disturbance and to avoid nuisance to the locality to comply with the National Planning Policy Framework 2012; Surrey Waste Plan 2008 Policy DC3 - General Considerations; and Reigate & Banstead Local Plan 2005 Policy EM3 – Design and Layout.

21. There shall be no glass handled outside the Materials Bulking Facility before 0730 Monday-Friday or 0800 on Saturdays and Bank/Public Holidays.

Reason: To ensure the minimum disturbance and to avoid nuisance to the locality to comply with the National Planning Policy Framework 2012; Surrey Waste Plan 2008 Policy DC3 - General Considerations; and Reigate & Banstead Local Plan 2005 Policy EM3 – Design and Layout.

Materials

22. The development hereby permitted shall not commence until details of the colours and all materials to be used externally have been submitted to, and approved in writing, by the County Planning Authority. The development shall be carried out strictly in accordance with the approved details and there shall be no replacement, or changes to the materials used externally on the buildings unless they have been approved in writing in advance by the County Planning Authority.

Reason: To enable the County Planning Authority to exercise control over the development hereby permitted and comply with Section 91 of the Town and Country Planning Act 1990 (as amended), the National Planning Policy Framework 2012; Surrey Waste Plan 2008 Policy DC3 – General Considerations; and Reigate & Banstead Local Plan 2005 Policy EM3 – Design and Layout.

Landscape & Ecology

23. The development hereby permitted shall not commence unless a Landscape and Ecology Management Plan dealing with the site’s landscape proposals, as shown on Drawing No. EWT03/Rev A dated July 2013, covering a period of 20 years (and providing for 5 yearly reviews) has been submitted to and approved in writing by the County Planning Authority. The Landscape and Ecology Management Plan shall be implemented in accordance with the details approved in writing by the County Planning Authority. The Landscape and Ecology Management Plan shall include the following details:-

- Aims and objectives of the Management Plan;
- Description and evaluation of features;
- Any constraints on site that may influence management;
• Management options for achieving the aims and objectives;
• Any specific management measures aimed at enhancing habitat quality or specific species;
• Detailed prescriptions for management actions including mitigation, enhancement, vegetation removal and vegetation replacement;
• Outline financial resources to be used in and personnel responsible for implementation of the Management Plan;
• Detailed work schedule for years 1 – 5 of the Management Plan, with subsequent detailed work schedules to be submitted every five years up to 20 years (i.e. for Years 6-10, Years 11-15, and Years 16-20). Each work schedule shall be submitted to the County Planning Authority for written approval by the end of September in the year preceding the year in which the work schedule is to be implemented and shall provide for the submission and approval in writing of annual work plans;
• Monitoring and review procedures, including contingency measures triggered by the monitoring process;
• Any supplementary planting with detailed specifications thereof;

and shall provide for:-

(a) the retention and management of existing features on the site including the area of trees named ‘G1’ on Drawing No EWT03/Rev A dated July 2013; and

(b) Details of the boundary treatment around the south western perimeter of the site, west of the Material Bulking Facility.

Reason: To enhance nature conservation interest and assist in absorbing the site into the local landscape to accord with Surrey Waste Plan 2008 Policy DC3 and the Key Development Criteria for Land at Earlswood Depot and Sewage Treatment Works, Redhill relating to Green Belt.

24. No trees, bushes and hedgerows retained on the site shall be cut down, uprooted or destroyed, and no trees retained shall be topped or lopped other than in accordance with plans and particulars submitted to and approved in writing by the County Planning Authority. If any retained tree is removed, uprooted, destroyed or dies within 5 years from the date of this permission, another tree shall be planted at the same place; and that tree shall be of such size and species, and shall be planted at such time, as shall be agreed in writing by the County Planning Authority.

Reason: To enhance nature conservation interest and assist in absorbing the site into the local landscape to accord with Surrey Waste Plan 2008 Policy DC3 and the Key Development Criteria for Land at Earlswood Depot and Sewage Treatment Works relating to Green Belt.

25. No removal or cutting of vegetation including trees and shrubs shall be carried out between 1 March and 31 August inclusive in any year, unless a scheme to prevent bird nesting and a check carried out by a suitably qualified ecologist is approved in writing by the County Planning Authority in advance of such works.

Reason: To ensure that breeding birds are not disturbed by the removal of habitat in accordance with the National Planning Policy Framework 2012 and Surrey Waste Plan 2008 Policy DC3 – General Considerations.
INFORMATIVES

1. The permission hereby granted shall not be construed as authority to carry out works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a licence must be obtained from the Highway Authority Local Highway Service Group before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice

2. When a temporary access is approved or an access is to be closed as a condition of planning permission an agreement with, or licence issued by, the Highway Authority Local Highways Service will require that the redundant dropped kerb be raised and any verge or footway crossing be reinstated to conform with the existing adjoining surfaces at the developer’s expense. (Note: It is preferable where possible to arrange for the adjacent highway to be included in the area edged red on the application when Circular 11/95 provides that conditions may be suitable to control this).

3. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).

4. Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant’s attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. Gatwick Airport requires a minimum of four weeks notice. For crane queries/applications please email gal.safeguarding@gatwickairport.com. The crane process is explained further in Advice Note 4, ‘Cranes and Other Construction Issues’ (available at http://www.aoa.org.uk/operations-safety/).

5. Pollution Prevention Guidelines will be appropriate for this site and the discharge of a number of planning conditions. Please check www.netregs.gov.uk for further information.

6. This development will require an Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency. The applicant is advised to contact Greg Davenport (0208 320 8524 / greg.davenport@environment-agency.gov.uk) to discuss the issues likely to be raised. An integral part of the Environmental Permit is an Environment Management System. This is a document that the permit holder will need to produce. The main amenity issues involved with this type of activity are odour, noise, dust / fibres / particulates / litter, deposits on road. These amenity issues should be identified in the Environment Management System with a clear description of the risks (of pollution) and the control methods that will be put in place.

7. Environment Agency guidance states that an operation of this nature will also require an Odour Management Plan. Please refer to ‘How to comply with your environmental permit’ (This document can be found on the Environment agency website).

8. If any controlled waste is to be removed off site, then the site operator must ensure a registered waste carrier is used to convey the waste material off site to a suitably permitted facility. The applicant is advised to refer to the Environment Agency’s guidance on their website: www.environment-agency.gov.uk/subjects/waste.
9. The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable for any off-site movements of wastes. The developer as waste producer therefore has a duty of care to ensure all materials removed go to an appropriate permitted facility and all relevant documentation is completed and kept in line with regulations. The developer must apply the waste hierarchy in a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government Guidance on the waste hierarchy in England is at: http://www.defra.gov.uk/publications/files/pb13530-waste-hierarchy-guidance.pdf

10. Excavated material arising from site remediation or land development works can sometimes be classified as waste. For further guidance on how waste is classified, and best practice for its handling, transport, treatment and disposal please see our waste pages at: http://www.environment-agency.gov.uk/business/topics/waste/default.aspx

11. With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

12. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.

13. A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at http://www.thameswater.co.uk/business/9993.htm or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

14. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

15. Directly west, adjoining the proposed development sits Earlswood Sewage Treatment Works. This is a Thames Water Asset. The company will seek assurances that it will not be affected by the proposed development.
BACKGROUND PAPERS

The deposited application documents and plans, including those amending or clarifying the proposal, responses to consultations and representations received as referred to in the report and included in the application file and the following:

Government Guidance

- National Planning Policy Framework 2012

The Development Plan

- Surrey Waste Plan 2008
- Reigate and Banstead Local Plan 2005

BACKGROUND PAPERS:-

- Circular 11/95 Use of Conditions in Planning Permissions (ODPM 2006)
- Dust Guidance (Institute of Air Quality Management 2012)
- Safeguarding of Aerodromes, Gatwick Airport Advice Note 8, Potential Bird Hazards from Building Design (July 2012)
- Planning & Compulsory Purchase Act 2004
- Environment Agency Permitting Regulations 2010
- Environmental Impact Assessment Regulations 2011
- Draft Updated National Waste Planning Policy (29 July 2013)
- Environmental Protection Act 1990
- Need Assessment which was undertaken by Babtie Group Ltd (2003)
- Surrey’s Annual Monitoring Report 2011-2012 (AMR 11/12)
- Surrey Waste Partnership Joint Municipal Waste Management Strategy 2010
- Planning application ref RE/P/13/00944/CON, Salfords Railyard
- Planning application ref 13/ 00882/CON and subsequent appeal to the Planning Inspectorate (ref APP/B3600/A/13/2206251), Britaniacrest
• Planning application ref: 12/01377/F, Redhill Aerodrome

• Design Manual for Roads and Bridges (DMRB) guidance on EIA for air quality, 2007

• BS8485:2007 - Code of practice for the characterization and remediation from ground gas in affected developments

• Town and Country Planning Act 1990

• Town and Country Planning (General Permitted Development Order) 1995 (as amended)
This page is intentionally left blank