TO: PLANNING & REGULATORY COMMITTEE **DATE:** December 2014

BY: PLANNING DEVELOPMENT CONTROL TEAM MANAGER

DISTRICT(S) SPELTHORNE BOROUGH COUNCIL **ELECTORAL DIVISION(S):**
Stanwell & Stanwell Moor
Mr Evans

PURPOSE: FOR DECISION **GRID REF:** 507082 173209

TITLE: **MINERALS AND WASTE APPLICATION SP/13/00141/SCC**

SUMMARY REPORT

Homers Farm, London Road (A30), Staines

Proposed extraction of sand and gravel from land at Homers Farm together with associated wheelwash, site office, cabin for generator and car parking, the provision of a new access from Short Lane, restoration involving the importation of inert restoration materials to agriculture, on a site of 10.5 hectares.

This is an application to extract 749,000 tonnes of sand and gravel from Homers Farm, with progressive restoration to agriculture to be completed by September 2020. Homers Farm is identified as Preferred Area G in the Surrey Minerals Plan 2011.

Homers Farm comprises an area of around 10.5ha of high quality agricultural land on the northern side of the A30, approximately 1.9km north of Ashford. Its eastern and north-eastern boundary forms the boundary of Surrey with the London Borough of Hounslow. It is within the Green Belt and close to a site designated as an SSSI and SPA.

The applicant proposes to transport the extracted mineral by HGV to be processed at Hengrove Farm, via the A30. Hengrove Farm is located approximately 2km south-west of the application site, and landfilling is complete at this site, other than in the processing area which is proposed to be used as part of this application.

Following extraction, the applicant proposes to landfill the site with inert material, such as hardcore, concrete and soils. This does not include household or putrescible waste. It would be restored to agriculture, with a number of additional features to increase biodiversity at the site.

After the submission of this application in 2013, it was discovered by monitoring that there was hydrocarbon contamination in the groundwater of the site, in the vicinity of the northern boundary where it adjoins an Esso fuel depot. Further work was undertaken to assess the extent of the contamination, and as a result the working area has been amended to exclude the area where contamination has been found.

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Some delay has occurred in deciding this application, due to the extra work resulting from the contamination issue above. Notwithstanding the delay that has occurred since submission, the applicant considers that restoration can still be completed by September 2020. In order to comply with the timing objectives, the number of HGVs have increased from the figures provided when the application was submitted, however landfilling at Hengrove Farm has now been completed so the total number of HGV movements at any one time from the Hengrove site has decreased.

While there have been a number of objections from local residents and residents associations, there have been no technical objections having regard to the National Planning Policy Framework. Officers do not consider that the development constitutes inappropriate development within the Green Belt.

The applicant also submitted two applications relating to Hengrove Farm at the same time that this application was submitted (references SP13/00956 and SP13/00958), which are both also presented to this Planning Committee. These two applications at Hengrove Farm relate to the extension of time that would be required for restoration of the processing area, and for importing the mineral from Homers Farm for processing, should this application be permitted. Hengrove Farm is currently due to be restored by December 2015 under the current permission (SP12/01416 dated 18th December 2012).

The recommendation is that subject to

- the prior completion of a Section 106 Unilateral Agreement with the applicant and landowners to secure a routing agreement for HGV vehicles accessing and egressing Homers Farm,

to PERMIT, subject to conditions.

APPLICATION DETAILS

Applicant

Henry Streeter (Sand and Ballast) Ltd

Date application valid

23 January 2013

Period for Determination

15 May 2013

Amending Documents
Surface Water Management Plan dated 25th June 2014
Flood Risk Assessment dated 30th May 2013
Human Health and Controlled Waters Risk Assessment Rev 2 dated August 2014
Tree Protection Plan PA-1732-12B Rev B dated 2 May 2014
Amended Scheme of Working received April 2014
Soil Movement Figures – revision 7 dated 14th February 2014

Site Layout Plan 1732/1L – revision L dated 12th February 2014
Method of Working Plan 1732/4F – revision F dated 12th February 2014
Method of Working Plan 1732/5F – revision F dated 12th February 2014
Proposed Direct Access to Short Lane – THP Plan 2A Amendment A July 2013
Operational Area Plan 1732/11C – revision C dated 13th February 2014
Landscape Proposals 1732-3D – revision D dated 13th August 2013
Restoration Plan PA-1732-6H – revision H 22nd September 2014
Dust Action Plan – issue no 03 dated 7th August 2013
Archaeology – Written Scheme of Investigation – dated 10th July 2013
Archaeology – Figure 1 Working areas plan
Archaeology – Figure 2 Plan showing Historic Environment Records, Areas of High Archaeological Potential and Scheduled Ancient Monuments within 1k radius of site dated 1st July 2011
Archaeology – Figure 3 Evaluation Trench Locations showing Linears dated 13th January 2012
Emergency Evacuation Procedure
Risk Assessment – dated 6th January 2014
Additional Environmental Statement – Addendum to Appendix C1
Groundwater Flood Risk Assessment Rev 2 – February 2014
Factual Site Investigation Report – October 2013
Hydrogeological Impact Assessment Rev 1 – February 2014
Letter forwarded from applicant dated 12th September 2014 (via email on 15th September 2014) – wait and see if this is necessary to be amending info – not sent to district yet
Revised Table 1A received 18th September 2014
Revised Table 2A received 18th September 2014
Email from applicant dated 23rd May 2013 regarding restoration
Email from applicant dated 18th September 2014 regarding traffic figures and timescale
Cross Sections Plan 1732/8B – Revision B dated 29th May 2013
Cross Section Plan 1732/13 – dated May 2013
Email from applicant dated 30th August 2013 regarding restoration soils
Landscape Management Plan 2nd revision dated 19th August 2013
Addendum to Dust Management Plan dated 7th October 2014

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.

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	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the report where this has been discussed
Need for the development	Yes	61-83
Hydrology and Flood Risk	Yes	95-123
Noise	Yes	124-144
Air Quality	Yes	145-175
Ecology	Yes	176-184
Landscape & visual impact	Yes	185-206
Birdstrike	Yes	207-210
Archaeology	Yes	211-216
Restoration	Yes	217-231
Lighting	Yes	232
Health and Safety	Yes	233-236
Traffic and Transport	Yes	237-256
Green Belt	Yes	257-265

ILLUSTRATIVE MATERIAL

Site Plan

Plan

Aerial Photographs

Aerial 1 – Location Plan
Aerial 2 – Application site area

Site Photographs

Figure 1 – Looking east across Homers Farm from Short Lane
Figure 2 – Looking south-east across site to A30
Figure 3 – Looking north-east towards Exxon Fuel Depot
Figure 4 – Looking north towards Exxon Fuel Depot from A30
Figure 5 – Looking north along Short Lane, to the west of the site
Figure 6 – Looking south along Short Lane, towards A30
Figure 7 – Junction of Short Lane and A30

BACKGROUND

Site Description

1. The application site, known as Homers Farm, comprises an area of agricultural land about 10.5 hectares (ha) on the north side of the A30, London Road, approximately 3.8km north east of Staines upon Thames and approximately 1.9km north of Ashford. The application site's eastern and north-eastern boundary forms the county boundary with the London Borough of Hounslow. Immediately adjacent to the south eastern corner of the application site lies the Brethrens Room, a non-residential building with a cluster of disused farm buildings and agricultural land beyond to the east. To the north east is a petroleum depot. The western half of the northern boundary abuts a sports ground with the Ashford Town Football Club beyond it. Heathrow Airport lies further to the north approximately 1.2km. The western boundary of the application site abuts Short Lane (D3132) which runs northwards from the A30 to the south joining with Long Lane to the north. Beyond Short Lane to the west lies the Ashford Sports Club and its associated grounds with a cemetery beyond. Beyond the north-west corner of the application site lies a residential area which forms part of Stanwell. The southern boundary of the application site abuts the A30. Beyond the A30 are residential properties with a Princes Lake (for watersports) beyond.

2. The application site lies within the Metropolitan Green Belt and an Air Quality Management Area. The Staines South Reservoir, designated as a Special Site of Scientific Interest (SSSI) which is also part of the South West London Waterbodies Special Protection Area (SPA) and RAMSAR site is approximately 1.2km to the west of the application site. Princes Lake is designated as a Site of Nature Conservation Importance (SNCI) and is approximately 240m to the south of the application site. The Bedfont Lakes Country Park Local Nature Reserve and Site of Nature Conservation Importance lies approximately 800m south east of the application site beyond the A30. The application site has high quality soils including Grades 1, 2 and 3a with Grade 2 being predominant.

3. As described above, there are residential properties to the south and north-west of the application site. The curtilages of the residential properties to the south of the A30 lie some 32m from the application site boundary. The curtilages of the residential properties to the north-west lie some 35m from the application boundary.

Planning History

4. There is no planning history related to this application site. The application site is identified within the Surrey Minerals Plan Primary Aggregates Development Plan Document (DPD) 2011 as Preferred Area G which means the site is identified an area suitable for the production of concreting aggregate.

THE PROPOSAL

5. The applicant is seeking planning permission for the extraction of some 749,000 (seven hundred and forty nine thousand) tonnes of sand and gravel from an area known as Homers Farm (10.5Ha) over a period of seven years. The applicant originally anticipated to commence in September 2013, but is unlikely now to commence until March 2015. The applicant anticipates that extraction would completed by the end of November 2019, and progressive restoration to be complete by September 2020.

6. Following the original submission of the application, an area of groundwater contamination was found in the north of the site, identified from monitoring boreholes, that is understood to have originated from the adjacent bulk fuel installation. Additional site investigations were carried out and the extent of the contaminated area identified. In order to avoid extracting contaminated mineral, and potentially creating new pathways for exposure to the pollution, the applicant has revised the working area to exclude the contaminated area, and has subsequently had to re-submit some of the documentation to take account for this change. The application site area extends to 10.5ha and the boundary has not been changed since the application was submitted, but the area now proposed to be worked since the contamination has been found is approximately 10.2ha.

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7. The applicant states that the omission of the contaminated area would result in the loss of approximately 20,000 tonnes of sand and gravel. At the time of the original submission however, an allowance of 17,000 tonnes was made for a 0.2m thick layer of gravelly overburden, and further investigation has shown that the material in this layer is capable of being processed. Therefore the yield is only likely to be 3000 tonnes less than the 752,000 tonnes originally estimated.

8. The applicant has subdivided the application site into a series of working areas which are described as follows:

- Working Area 1W – this is the north western corner and western side of the application site
- Working Area 1N – this is the north eastern part of the application site, with semi circle sized area excluded on the boundary of the Esso site.
- Working Area 1S – this is the southern extent of the application site
- Working Area 2 – this is the north eastern component of the central area of the application site
- Working Area 3 – this is the north western component of the central area of the application site
- Working Area 4 – this is the southern component of the central area of the application site
- Working Area 5 – this is the south western corner of the application site and is also known as the Temporary Operational Area as the applicant proposes that this would be the part of the application site where the wheelwash, site office, vehicle parking and cabin for the generator would be situated for the duration of the proposal.

9. The applicant proposes to work the site over five phases as follows, although explains that there may be some overlap:

Phase 1

10. Access into the application site from Short Lane would be constructed with all appropriate sight lines. Top soils and subsoil would then be removed from temporary operational area (Working Area 5). Topsoil would be stored on temporary soil heap A and subsoil placed to form part of acoustic bund B. Ballast would then be extracted from Working Area 5 and stored temporarily to the north of the temporary site office, on Working Area 1W. Clay liner would then be constructed and ballast replaced in void in Working Area 5.

11. Following this, the operation area and car park would be constructed, and the wheel-cleaner and office installed. Topsoil would then be removed from Working Area 1W, then 1S then 1N and placed to form temporary topsoil heap A. The haul road would then be constructed. The subsoil from Working Area 1W then 1S then 1N would be removed and placed to form acoustic bund A and remainder of acoustic bund B. Surplus subsoil would be placed on temporary soil heap B. The height of these stockpiles would be 3m for topsoil and 5m for subsoil. Adjacent to the acoustic bunds the applicant proposes to plant

a native hedge. The acoustic bunds are positioned to avoid all underground services. It is anticipated that bund construction would take around eight weeks to complete.

12. Extraction would then commence from Working Area 1 followed by installation of a clay seal around edge of working area 1. A clay liner is required by the Environment Agency for all inert landfill sites to ensure no groundwater pollution occurs to the locality from the landfill. The clay liner would be constructed from in situ clay.

13. Trial pits which were dug in September 2013 allowed the applicant to establish the extent of contamination at that time, and the location of the geological barrier has been selected to avoid the contaminated ground which will be left in a sterile area. While Working Area 1N is excavated, a protocol would be adopted as follows. Whilst digging out sand and gravel and underlying London Clay for the purposes of constructing the geological barrier in the vicinity of the oil contaminated area, each bucket load from the vicinity of the water table will be carefully inspected for evidence of oil contamination, such as black staining and odour. Evidence from the site investigation shows that the contaminated soils are very easy to identify.

Phase 2

14. Topsoil and subsoil would be removed from Working Area 2, to temporary spoil heaps A&B on Working Area 4. Extraction would commence from Working Area 2. Filling would then commence in Working Area 1N and progress to part of Working Area 2. The applicant anticipates this phase to take approximately 9 months to complete.

Phase 3

15. Landfilling would be nearing completion in Working Area 2. Topsoil and subsoil would be stripped from Working Area 3 and placed onto filled Working Area 1N. Topsoil and subsoil from temporary storage areas would be used to complete the restoration of Working Area 1N. Extraction would commence from Working Area 3, and filling would take place in Working Area 1W. The applicant anticipates this phase to take approximately 9 months to complete.

Phase 4

16. Landfilling would commence in Working Area 3, and would be completed in Working Area 1W. Working Area 2 would be restored with soils from temporary soil heaps A & B. Remainder of the spoil heaps A & B would then be relocated to filled area of Working Areas 1N and 1W, and part of Working Area 3, that would already be filled. Extraction would commence from Working Area 4. The applicant anticipates this phase to take approximately 18 months to complete.

Phase 5

17. Filling of Working Area 1S and Working Area 4 would commence, and Working Area 1S would be restored using soil from the southern bund and temporary spoil heap A. Working Area 4 would then be restored using soil from temporary spoil heaps A & B. Working Areas 1W and 3 would be restored using soil from temporary spoil heaps and both bunds. The haul roads would be removed and restored. The site office, cabin, parking and operational areas would be removed, and extraction would commence in Working Area 5, followed by filling and then restoring. The applicant anticipates this phase would take approximately two years to complete.

18. The applicant does not propose to dewater the site during the extraction or landfilling stages but to work the application site wet using a 360^{o} excavator and taken by dump

truck to the stacking area in the Temporary Operational Area where it would be allowed to drain. The applicant does not propose to process the sand and gravel on site but, once water has drained from the mineral, to transport it from the application site by Heavy Goods Vehicle (HGV) to the processing plant at Hengrove Farm via the A30 (subject to planning permission under a separate application). Hengrove Farm is located approximately 2km south west of the application site, and landfilling is complete at this site, other than the processing area which is proposed to be used as part of this application. The applicant has stated that the deposit at Homers Farm would be uneconomical to work unless it can be processed at Hengrove.

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19. HGVs would leave the application site and travel down Short Lane to the A30 where they would then turn left onto the A30 and travel north east to the Clockhouse Roundabout. HGVs would then go around the roundabout and back onto the A30 westbound and using the dedicated exit, access Hengrove Farm. From Homers Farm, the applicant anticipates the mineral extraction component of the proposal would generate 54 movements per day, and during the period where both mineral extraction and landfilling would take place and this would give rise to some 132 HGV movements per day, dropping again to 128 movements once extraction has ceased. There would also be increased traffic associated with Hengrove Farm, as the material would be taken there for processing. This would give rise to 54 movements per day for processing, 128 movements per day during the period when processing and exportation of the processed aggregates was taking place, and then 176 movements per day during the final period when exportation and restoration of Hengrove Farm was taking place. 100 of these 176 movements however are already permitted under application SP12/01416 dated 18th December 2012, in association with the restoration of Hengrove Farm, albeit for a different time period at present.

20. The applicant proposes to landfill the site with inert waste such as soils, concrete and hardcore material. This does not include household or putrescible waste.

21. The applicant has agreed that hours of operation would be 0730 – 1800 hours Monday – Fridays; and 0830 – 1300 hours on Saturdays. There would be no working on Sundays or Public Holidays. The applicant proposes that lighting would be installed on the Operational Working Area attached to the site office and that this lighting would only be lit during working hours.

CONSULTATIONS AND PUBLICITY

District Council

22.	Spelthorne Borough Council		
	- Planning	:	No objection subject to: • the relocation of the access to direct from London Road in a position to be opposite the mid-point of the field frontage on the south side of that road • the extension of the noise bund along the entire frontage to Short Lane • appropriate conditions being imposed to ensure suitable mitigation measures in relation to residences and other properties in the locality in particular covering: a Dust Action Plan; noise levels; days and hours of operation with the Saturday morning start time being restricted to 0800 hours; any necessary air quality mitigation measure; satisfactory access design and routing agreement including a requirement for vehicles to turn left from Short Lane onto the A30 and to follow the route to the east to the Clockhouse Lane roundabout, compliance with other recommendations in consultants reports; and requirement to complete the restoration work by 31.12.20
23.	- Environmental Health	:	Supports a routing agreement and condition to ensure the applicant's fleet meets London Low Emission Zone standards. Wanted clarification on who is responsible for dust management at the site and updating the plan. Considers the groundwater boreholes to east and south-east should be monitored and all boreholes monitored more frequently when contamination reaches the edge of the plume.

Consultees (Statutory and Non-Statutory)

24.	Fisher German LLP (Esso Pipeline)	:	No objection to the proposals so long as the enclosed 'Special Requirements for Safe Working' booklet and the covenants contained in the Deed of Grant (*a legal agreement between the original landowner and Esso under which the pipeline was laid*) are adhered to
25.	Thames Water	:	No objection subject to condition
26.	BAA Aerodrome Safeguarding	:	No objection subject to the imposition of an informative
27.	The Environment Agency	:	No objection subject to conditions

	South East		
28.	Natural England	:	No objection with regard to potential impacts on the SPA, SSSI and RAMSAR sites. Notes the proposal is within 220m of the Bedfont Lakes Country Park & Princes Lake Local Wildlife Sites (LWSs) but does not consider the proposal would have an impact on these. Note that the application recommends ongoing groundwater monitoring to continue and recommends this as a condition.
29.	Surrey Wildlife Trust	:	No objection. Requested that the applicant undertake all recommended actions in section 4.0 of the Ecological Survey Report (appendix K of the ES) and wish to see more biodiversity for the site on restoration (which has now been added).
30.	Affinity Water Ltd	:	No objection. Commented that the site is located within a defined Source Protection Zone corresponding to Egham Pumping Station. The works and operation should be done in accordance with the relevant British Standards and Best Management Practices
31.	National Grid	:	No objection subject to a condition requiring the applicant to contact them before any work is undertaken
32.	London Borough of Hounslow	:	No objection
33.	Highways Agency	:	No objection subject to a condition limiting the routing of HGVs to/ from the site along the A30.
34.	English Heritage	:	No objection
35.	Health and Safety Executive	:	No objection, subject to condition
36.	Ministry of Defence	:	No objection
37.	County Highway Authority	:	No objection, subject to a routing agreement via S106 and conditions
38.	County Ecologist	:	No objection, subject to condition.
39.	County Geological Consultant	:	No objection, subject to conditions. During application process has requested further information and several changes to the Human Health Risk Assessment and Surface Water Management Plan which were carried out.
40.	County Landscape Architect	:	No objection subject to conditions.
41.	County Noise Consultant	:	No objection subject to a condition setting noise limits for operating at the site, and hours of working
42.	Environmental Impact Assessment team	:	No objection – originally more information required on the cumulative impact of the proposal (which was later provided)
43.	County Air Quality Consultant	:	No objection, subject to conditions. Originally requested further information on the impact on sensitive receptors within 350m of the site and the impact on the SNCI.
44.	County Archaeologist	:	No objection subject to the imposition of a requesting a Written Scheme of Investigation is

			submitted prior to the commencement of development.
45.	County Enhancement Officer	:	No objection – the restoration proposed is in accordance with that set out in the Restoration SPD

Parish/Town Council and Amenity Groups

46.	The Neighbourhood Society	:	No comments received
47.	Staines Town Society	:	No comments received
48.	Stanwell Moor Residents' Association	:	No comments received
49.	Ashford North Residents Association (ANRA):		

7	Objects. Raised concerns with regard to the number of HGV trips associated with the proposal per day, have queried why a processing plant cannot be set up at Homers Farm, concerns about Clock House roundabout due to the poor vision and delays that the proposal may cause to this roundabout, that the site would be returned to agriculture, that temporary traffic lights at the intersection from Short Lane and Harrow Road along the A30 be provided, whether the processing plant at Hengrove Farm would be used after 2020; what safeguards would be in place to ensure gravel does not come off the back of lorries, what compensation to the community would be offered whilst the work would be on going, that a defined routing agreement be put in place for the HGVs, why hasn't an extension of time application been submitted for Hengrove Farm (at the time of the Homers Farm submission), the potential hazards to Short Lane and the A30 from slow vehicles leaving Short Lane to join the A30, what would happen in terms of repairing the A30 from the damage the HGVs would cause to it and who would instigate this, that many residents beyond 90m have not been consulted on the proposal. Request permanent traffic calming, LCD signs and speed cameras alongside an automated pedestrian crossing points between the Crooked Billet to the Clock House roundabouts. Asked why applicant exempt from CIL or S106 payments. Ashford North Residents Association comments July 2013 • Concern that removing the sand and gravel in the area will exacerbate local flooding • Hengrove Farm is adjacent to the Shortwood Common SSSI and object to the proposal on the grounds of ongoing impact on wildlife and protected areas • Streeters are seeking a deferral of extraction and restoration of the whole of Hengrove Farm which is excessive and unjustified. Streeters should only seek a deferral for the part of Hengrove that is related to the Homers Farm application. • Concerned that in granted an extension of time at Hengrove Farm in relation to working at Homers Farm that this will set a precedent for the applicant to purchase other land in the vicinity for the same reason and result in Hengrove Farm being there indefinitely as there has been a continual bombardment of applications. • There is an impact on house prices and there should be certainty about when the site will finish for homeowners • Lorries leaving the site [Hengrove Farm] are causing danger for vehicles using the u-turn as they don't take into consideration those joining the west bound carriage • Lorries from Hengrove [Farm] are often travelling in speeds that exceed the30mph • Even with the wheel wash there is still sand and gravel being deposited on the road • The beeping of lorries at the site during the day is annoying • Residents have had enough of [Hengrove Farm] and have had to put up with inconvenience for too long

50.	Shortwood Common Residents Association
	Firmly opposes the proposals as submitted in relation to this application and the Hengrove Farm planning proposals which should be taken in tandem as they both affect local residents. Henry Streeters are dishonest as they said that working at Hengrove Farm would be complete by 2013 and this is clearly an untruth. The volume of traffic the A30 currently supports is substantial. The volume of trucks that access and egress the Hengrove site causes hold ups on the A30 and the level of dirt deposited from the site onto the road causes a mess and contributes to dangerous breaking on the slip road. If Homers Farm is approved this will triple the volume of trucks on the road. This will have a direct impact on the peace and quiet which residents currently have.

51. Officer comments: The ANRA have queried why are Henry Streeter's are exempt from Community Infrastructure Levy (CIL) or Section 106 payments. The Planning Act 2008 Section 205(2) is clear that "*...the overall purpose of (Community Infrastructure Levy) CIL is to ensure that costs incurred in supporting the development of an area can be funded (wholly or partly) by owners or developers of land in a way that does not make development of the area economically unviable"*. CIL only applies to new building or alterations to an existing building so not uniformly to all development. So CIL could not, for example, be applied across the entire site area of a proposed quarry but to the site office at the quarry which could have a small footprint. If there were to be CIL charging in relation to the site office for this site, it would need to relate to new infrastructure requirements as a consequence of the proposal and where it does, it is likely to be of a specific nature for example a road upgrade to accommodate heavier vehicles if this is deemed to be necessary for the development.

52. The Planning Act 2008 does not allow for County Councils to be a charging authority although, in the context of minerals planning, County Councils would be the collecting authority. Spelthorne Borough Council would be the charging authority in this case. At the moment Spelthorne Borough Council's charging schedule has not been finally published (it is subject to modification of the map illustrating charging zones). Therefore at this stage, there is no mechanism for the collection of CIL monies in Spelthorne borough. Additionally CIL is currently be aimed at (where charging authorities have a charging schedule in place) collecting monies from residential and retail development; not other business development which could include quarries. Where business other than retail has been identified in charging schedules for other districts/ boroughs within Surrey (adopted and proposed), the CIL rate has been put at £0, i.e. no CIL monies would need to be provided for other business development.

53. Officers consider that other issues raised above are dealt with in the body of the report below.

Summary of publicity undertaken and key issues raised by public

54. The application was originally publicised by the posting of five site notices and an advert was placed in the local newspaper. A total of 736 of owner/ occupiers of neighbouring properties were directly notified by letter. 27 letters of representation were received on this proposal raising the following concerns below with one of these letters raising no objection to the proposal. The applicant subsequently submitted further amending and amplifying information on the planning application and the Environmental Statement in June 2013 and a further consultation was carried out. Further amending and amplifying information was submitted in April 2014, and a third consultation carried out. A fourth consultation was carried out in October 2014 when the revised traffic information was received, to which we received one response. The information submitted in support of the Environmental Statement is known as Regulation 22 information (information required under Regulation 22 of the Environmental Impact Assessment Regulations), so it was a joint Regulation 22

and planning consultation. The comments received can be summarised as follows, and the relevant issues raised are discussed within the report:

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Application Issues

- This application should be considered in tandem with the Hengrove applications as they are interlinked
- The works taking place until 2020 is far too long a time & will cause disruption to the community
- Who will be responsible for monitoring the site to ensure there is no dumping
- Location of the development is inappropriate
- It is not clear why from the application the mineral cannot be processed at Homers Farm
- Development has already started by someone erecting a entrance across the bus stop on the A30 at the corner of Short Lane
- Despite close proximity to the site have received no planning notification
- There has been no consultation by the council with local residents
- There are no notices on or near the land to advise of the planning application
- Are aware of the need for minerals but the number of extraction projects in Spelthorne makes the area look unattractive & rundown & like an industrial site. Spelthorne has already supplied enough minerals
- There is already another site in close proximity & it seems overbearing in a small area

Pipeline

- There are several oil & gas pipelines crossing Short Lane at the A30 end & the extra weight of the HGVs may affect them due to vibration

Quality of Life

- The proposed increase in traffic will have a direct impact on the peace& quiet which residents currently have
- Will be like living in a building site with the noise, dust, traffic

Wildlife

- Will ruin the wildlife at the site
- The site is based close to a Nature Reserve & this will directly impact on it

Hours of Operation

- The proposed number of hours are far too much

Noise

- Cause noise pollution
- Noise from machinery
- Property already affected by other noise and don't need to add another
- There will be noise from generators and drilling

Visual Impact

- View from upper floors of property will become unsightly
- Will there be a large board in place so residents cannot see or hear what is going on?
- Why does the noise bund running north/south along Short Lane not run the full length? Why was there no noise survey done for the sports club?
- Will create an eyesore

Air Quality

- Cause air pollution from the old vehicles that haul ballast
- The air pollution will cause asthma/ health problems
- The increase in dust will put the elderly & young people at risk of health problems
- 'Sand clouds' will form over the site
- Will create dust which will carry & dirty laundry
- The area is already an AQMA & the transportation of the as raised ballast to Hengrove will cause more pollution
- The extraction of sand & gravel will have a great effect on AQ in the area
- How will properties to the west be protected from dust residue during dry conditions

Green Belt

- The site is in the Green Belt

Transportation and Highways Issues

- Will lead to mud on the road as wheelwashers are insufficient/ what measures will be in place to ensure this doesn't happen
- Will the wheelwash lead water on the road & in freezing conditions create ice? Will there be a need for extra gritting of the road?
- If private vehicles are damaged by the debris from HGVs from the proposal who will be held responsible?
- Who will be responsible for maintaining the integrity & cleanliness of the highways due to the volume & condition of traffic
- Proposal will cause accidents from having slippery surfaces from mud on the road
- The road around the entrance at Short Lane is already aged & crumbling tarmac & the extra traffic will damage the road further
- There will be wear & tear to the A30
- Why aren't traffic calming measures being looked at on A30 as a result of this proposal?
- There is a lack of automated pedestrian crossing points from the Crooked Billet to the Clock House lane roundabout
- object on grounds of heavy traffic coming & going for the majority of the day, 6 days a week
- If HGVs miss the entrance to the quarry where will they turn? There will be temptation to use the sports club entrance as a turning point. What measures will be in place to stop this
- Have the Highway Agency responsible for the upkeep of the A30 been informed of the proposals?
- There is danger of these new vehicles crossing the original cut-out & lorries running past the houses in the lay-by
- The proposed traffic will cause hold ups on the A30
- Will there be queuing on the A30 to Homers/ Hengrove whilst HGVs wait to access the site?
- The constant heavy traffic will affect my quality of life
- It will be a problem for sports clubs who use their access several times a week and on match days
- Additional traffic is too dangerous
- The additional vehicles will create a danger to those using the sports club a number of which are children
- Short Lane is a narrow lane & the proposal will cause significant disturbance of it
- If permit this application will be tripling the volume of HGVs on the A30

Restoration

- We will end up with another big hole of water
- Will it be restored as a farm?

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Water Issues

- Issue of water runoff once the land is restored as the land would be compacted
- The local area already suffers from localised flooding
- What will be the impact on the drainage of the Ashford Sports Club land during the extraction period?
- What will be the impact on the drainage of the Ashford Sports Club post restoration?

Bird Strike

- Will there be any measures to restrict flocking birds to the site

Other

- Likely to hinder selling of property
- Want a substantial drop in council tax if this goes ahead
- The site is in close proximity to a cemetery which is a place for serenity
- The site is in close proximity to Heathrow Airport & is already suffering
- The site is in close proximity to Ashford Hospital

Conditions should planning permission be granted

- An enforcement officer to monitor the company to make sure they strictly obey the conditions of the planning application
- The applicant should be restricted to weekday hours only
- Should ensure the proposal lasts only 7 years & should not turn into a different project & should be restored
- A bond of money should be collected to ensure restoration in case the applicant goes bankrupt. If this cannot be enforced the applicant should show good will by entering into one
- No extension of time should be given

Company Issues

- Object as the company has just recently received planning permission for Hengrove Park
- The company have had extensions for the past 20 years & adding Homers Farm would see more extensions until 2020
- The applicant has said that they will restore Hengrove according to the original permission but they can't as they need the site for Homers.
- The applicant is dishonest as they said Hengrove would be complete by 2013 & it would not be with this proposal

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PLANNING CONSIDERATIONS

55. The County Council as Minerals Planning Authority (for clarity, Officers refer to the County Council as the County Planning Authority – 'CPA' elsewhere in this report) has a duty under Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 to determine this application in accordance with the Development Plan unless material considerations indicate otherwise. At present in relation to this application the Development Plan consists of the Surrey Minerals Plan 2011; the Surrey Waste Local Plan 2008 (SWP 2008), and the Spelthorne Borough Core Strategy and Policies DPD (2009), Allocations DPD (2009); and the Spelthorne Borough Local Plan 2001 Saved Policies.

56. On the 27 March 2012 Government published the National Planning Policy Framework (NPPF) and Technical Guidance to the National Planning Policy Framework (NPPF Technical Guidance), which took immediate effect. The NPPF replaces 30 Planning Policy Statements, Planning Policy Guidance Notes, Minerals Policy Statements and Minerals Policy Guidance Notes and related Practice Guides, some Circulars and letters to Chief Planning Officers and constitutes guidance for local planning authorities and decision-takers in relation to decision-taking (determining planning applications) and in preparing plans. The new National Planning Policy for Waste was published on 16 October 2014 and replaces Planning Policy Statement 10 (PPS10) Planning for Sustainable Waste Management.

57. At the heart of the NPPF is a presumption in favour of sustainable development, which the document states should be seen as a golden thread running through both plan-making and decision-taking. The NPPF makes clear the purpose of the planning system is to contribute to the achievement of sustainable development, which has three dimensions: economic, social and environmental. These give rise to the need for the planning system to perform a number of mutually dependent roles: an economic role, a social role and an environmental role. The NPPF sets out 12 core land-use planning principles that should underpin both decision-taking and plan making.

58. The NPPF does not change the statutory principle referred to above that determination of planning applications must be made in accordance with the adopted development plan unless material considerations indicate otherwise. The NPPF is one of those material considerations. The NPPF includes transitional provisions for implementation of the NPPF. For 12 months from the date of publication (27 March 2012) planning authorities can continue to give full weight to relevant policies in adopted development plan documents adopted in accordance with the Planning and Compulsory Purchase Act 2004 since 2004, even if there is a limited degree of conflict with policy in the NPPF. In other cases and following the 12-month period the weight to be given to policies in the adopted development plan documents should be determined according to their degree of consistency with the NPPF.

59. All of the development plan documents listed above were adopted prior to the implementation of the NPPF. As such there is a need to ensure there is consistency between policies adopted within the DPDs and the NPPF.

60. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. Key issues to consider include restoration and the Green Belt, waste management issues including location and need, access and the impact from traffic generated by the proposal, the impact on local amenity and the environment in terms of landscape, noise, visual impact, hydrogeology and flood risk, ecology and archaeology.

MINERALS DEVELOPMENT AND NEED

Surrey Minerals Plan 2011 Core Strategy Development Plan Document
Policy MC1 – Spatial strategy – location of mineral development in Surrey
Policy MC7 – Aggregates Mineral Supply
Surrey Minerals Plan 2011 Primary Aggregates Development Plan Document
Policy MA1 – Aggregate Supply
Policy MA2 – Preferred areas for concreting aggregate

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61. The NPPF and its technical guidance sets out the Government's approach on the management and planning's role with regard to minerals. Paragraph 142 states that minerals are essential to support sustainable economic growth and our quality of life, and it is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. It explains that since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long term conservation. Paragraph 144 sets out a number of bullet points that should be considered when determining planning applications. Those that are relevant to this proposal include:

- giving great weight to the benefits of the mineral extraction including to the economy;
- ensure in granting planning permission for mineral development that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety and take into account the cumulative effect of multiple impacts from individual sites and/ or from a number of sites in a locality;
- ensure that any unavoidable noise, dust and particle emissions are controlled, mitigated or removed at source and establish appropriate noise limits for extraction in proximity to noise sensitive properties; and
- provide for restoration and aftercare at the earliest opportunity to be carried out to high environmental standards through the application of appropriate conditions and that bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances.

62. Paragraph 145 requires mineral planning authorities to plan for a steady and adequate supply of aggregates. The paragraph sets out a number of bullet points as to how this can be achieved including by preparing an annual Local Aggregate Assessment, taking account of published National and Sub National Guidelines on future provision, using landbanks of aggregates mineral reserves principally as an indicator of the security of aggregate minerals supply and to indicate the additional provision that needs to be made for new aggregate extraction. The paragraph recommends making provision for the maintenance of landbanks of at least 7 years for sand and gravel. The length of the landbank is used to assess the balance of meeting the demand for aggregates and keeping the number of operations and permitted reserves to a minimum to reduce environmental consequences.

63. The Plan for Growth published in March 2011 by the Department for Business Innovation and Skills (BIS) set out a strategy to put the country on a path to sustainable, long term economic growth. The strategy includes a clear signal that the need to support economic growth and recovery should be taken fully into account in the planning system. This was to be supported by the introduction of a powerful new presumption in favour of sustainable development so that the default answer to development is 'yes'.

64. The Surrey Minerals Plan Core Strategy DPD 2011 sets out the County Council's approach to the provision of mineral resources within the plan period up to 2026 alongside ensuring protection of the environment and residential amenities. Paragraph 1.7 recognises that minerals make a significant contribution to our quality of life with an adequate supply of aggregate minerals be required for building and repairing houses, roads, schools and hospitals. Policy MC1 sets the spatial strategy for the location of mineral development in Surrey. It states that mineral extraction of concreting aggregates will be concentrated on the river terrace gravels of the Thames in north-west Surrey with preferred areas for future sand and gravel production being identified in the Primary Aggregates DPD. The application site is located within north-west Surrey on the Thames gravels so the proposal meets the requirements of this policy.

65. The Core Strategy seeks to ensure a supply of aggregate minerals over the plan period for the county which echoes the requirements of the NPPF. Paragraph 5.12 states that proposals for mineral extraction within the preferred areas will be determined in the context of the apportionment to the county and the landbank position at the time when applications are considered. The paragraph goes on to say that the landbank position will be monitored annually and if below seven years, the deficit situation will be a material consideration in determining applications on preferred areas. Policy MC7 of the Core Strategy states that preferred areas will be identified in the Primary Aggregates DPD for soft sand and concreting aggregates which, with identified reserves, are sufficient to enable the production of around 24 million tonnes of aggregate between 2009 and 2026. The policy goes on to state that the mineral planning authority will seek to maintain a landbank of at least seven years for aggregates based on the apportionment set in the regional spatial strategy (which has since been revoked). This enables production at an average rate of 1.4mtpa between 2009 and 2026.

66. The Minerals Plan Primary Aggregates DPD recognises that resources of primary aggregates, particularly concreting aggregate, are becoming increasingly scarce as remaining resources become more constrained; whether because of their potential impact on local communities or the environment or because they are too small to be economically viable. Policy MA1 of the Primary Aggregates DPD requires provision to be made for the supply of around 24 million tonnes of primary aggregates, comprising 15 million tonnes of concreting aggregate and 9 million tonnes of soft sand between 2009 and 2026. The policy states that preferred areas will be identified which together with permitted reserves will enable production of concreting aggregate at an average rate of 0.90mtpa. The policy does also state that in determining proposals for mineral working, regard will be paid to the level of permitted reserves, and the need to maintain continuity of supply in terms of an appropriate landbank.

67. Policy MA2 sets out preferred areas for concreting aggregate within the county for the plan period. Listed within this policy is Homers Farm as preferred area G. The application site has in fact been identified as suitable for mineral working in every one of the Surrey Minerals Plans since 1982. The annex to the DPD lists specific key development requirements should a planning application be forthcoming for Homers Farm including access being via Short Lane (as proposed) or directly to the A30, potential impacts various matters assessed, including local amenity, baseline ecology, archaeology, hydrology, flood risk, fuel pipelines, air quality, impact on Grade 1 agricultural land, and aerodrome safeguarding.

Landbanks

68. Paragraph 145 of the NPPF requires mineral planning authorities (MPAs) to plan for a steady and adequate supply of aggregate through what is known as the Managed Aggregate Supply System (MASS). Guidance on this is now provided through the NPPG. Paragraph 145 of the NPPF sets out a number of bullet points as to how this can be achieved including by preparing an annual Local Aggregate Assessment (LAA), taking account of published National and Sub National Guidelines on future provision, using landbanks of mineral reserves of aggregates principally as an indicator of the security of aggregate minerals supply and to indicate the additional provision that needs to be made for new aggregate extraction.

69. The paragraph requires MPAs to make provision for the maintenance of landbanks of at least 7 years for sand and gravel. An aggregate mineral landbank is the tonnage of already permitted reserves. It is usually expressed in terms of the number of years of supply remaining based on the annual mineral provision rate set out in the Local Aggregate Assessment.

70. Guidance on landbanks in Minerals paragraph 080 of the NPPG is that they are principally a monitoring tool to provide a mineral planning authority with early warning of possible disruption to the provision of an adequate and steady supply of land won aggregates in their area. In taking decisions on planning applications Minerals paragraph 082 of the NPPG states that "low landbanks may indicate that suitable applications should be permitted as a matter of importance to ensure the steady and adequate supply of aggregates." Minerals paragraph 084 states that each application should be considered on its own merits regardless of the length of the landbank and although there is no maximum landbank level, a landbank below the minimum level may be seen as a strong indicator of urgent need.

71. The NPPF at paragraph 145 advises that for aggregate landbanks periods longer than 7 years may be appropriate under certain circumstances. These include taking into account the need to supply a range of aggregates, the locations of permitted reserves relative to markets, and the productive capacity of permitted sites. MPAs are also required to ensure that large landbanks bound up in very few sites do not stifle competition.

72. Policy MA1 of the Surrey Minerals Plan Primary Aggregates DPD (July 2011) states that preferred areas will be identified which together with permitted reserves will enable production of concreting aggregate (sharp sand and gravel) at an average rate of 0.90 million tonnes per annum (mtpa) and 0.5 mtpa for soft sand. Policy MA1 also states that in determining proposals for mineral working, regard will be paid to the level of permitted reserves, and the need to maintain continuity of supply in terms of an appropriate landbank. The County Council's Local Aggregate Assessment (LAA) published in November 2014 proposes no changes to the minerals provision rate contained in the Surrey Minerals Plan.

73. An Aggregates Monitoring Survey is undertaken each year to provide data to the minerals industry, mineral planning authorities and government on sales and permitted reserves of primary aggregates. The survey is coordinated by the South East England Aggregates Working Party (SEEAWP) and is undertaken by the mineral planning authorities on an annual basis.

74. The latest information on sales, reserves and the landbank of primary aggregates in Surrey is contained in the Aggregates Monitoring Update: May 2014 and the LAA (November 2014). This contains the results of the Aggregates Monitoring Survey 2013 (AM2013). This supersedes data contained in the Annual Monitoring Report (AMR) 2012/13.

75. The results of the Aggregates Monitoring Survey 2013 for Surrey are set out below:

- Land-Won Primary Aggregates (tonnes) Sales: Soft sand – 429,500; Sharp sand & gravel – 332,302; and Sand & gravel or hoggin for construction fill – 33,817. (Total for aggregate use – 795,619)
- Permitted Reserves: Soft sand – 4,366,000; Sharp sand & gravel – 1,749,959; and Sand & gravel or hoggin for construction fill – 9,000. (Total for aggregate use – 6,124,959)

76. The total landbank in Surrey was 6.7 years at the end of 2012. However the results of the Aggregates Monitoring Survey 2013 indicate that there has been a sharp fall in the landbank to 4.4 years at the end of 2013. This was due to: a significant reserve reassessment at a major soft sand quarry; the recalculation of soft sand reserves at two quarries primarily containing reserves of silica sand; the expiry of planning permission at another soft sand quarry; and no new permissions being granted for primary aggregate extraction in 2013 to replenish the extraction of permitted reserves during the year.

77. However, the recent granting of planning permission for the extraction of 4.1 million tonnes (mt) of soft sand at Mercers South has increased the landbank to 7.3 years based on the amount of permitted reserves remaining at the end of 2013. Subject to the completion of a Legal Agreement, the granting of planning permission for the extraction of 0.77 mt of soft sand at Alton Road would extend the landbank to 7.8 years, again based on the amount of permitted reserves remaining at the end of 2013.

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78. However, the total landbank position masks a significant distortion between the landbanks for sharp sand & gravel and soft sand. Policy MA1 (Aggregate Supply) of the Primary Aggregates DPD splits the total primary aggregates supply figure of around 24 mt into separate provision rates for concreting aggregate and soft sand. This results in an average minerals provision figure of 0.9mtpa for concreting aggregate and 0.5mtpa for soft sand. At these production rates, permitted reserves of concreting aggregate would last for only 1.9 years, and soft sand for 8.7 years from the start of 2014.

79. However, the recent granting of planning permission at Mercers South has increased the soft sand landbank by 8.2 years to 16.9 years based on the amount of permitted reserves remaining at the end of 2013. Subject to the completion of a Legal Agreement, the granting of planning permission for Alton Road would increase the landbank for soft sand further to 18.4 years. With no new permissions for sharp sand & gravel extraction being granted in 2014, the already significant distortion between the separate landbanks for soft sand and sharp sand & gravel at the end of 2013 has therefore substantially increased. The remaining landbank of 1.9 years at the end of 2013 for concreting aggregates therefore points to an urgent and pressing need to replenish dwindling permitted reserves to maintain continuity of supply.

80. It should be acknowledged that there are currently four further planning applications for the extraction of sharp sand and gravel (concreting aggregate) awaiting determination. These include three new quarry applications on sites allocated in the SMP 2011 Primary Aggregates DPD comprising Milton Park Farm, Egham; Manor Farm, Laleham; and Watersplash Farm, Halliford, as well as one application to reopen Addlestone Quarry which was previously mothballed during the economic downturn and where planning permission has expired.

81. Taken together, these four applications propose the extraction of a further 4.92 mt of sharp sand and gravel. However, it cannot be assumed at this time that any of these planning applications will be permitted and as a consequence, their existence cannot be used to influence the determination of this application which should be considered on its own merits.

82. If all 5 current applications for sharp sand and gravel in the county were permitted, this would increase the landbank for sharp sand and gravel to around 8 years. Therefore, in determining future applications that would increase the sharp sand and gravel landbank above 7 years, in order to comply with NPPF paragraph 145, it may be necessary to justify such proposals in terms of their contribution to the need to supply a range of types of aggregates, locations of permitted reserves relative to markets, and productive capacity of permitted sites.

Conclusion

83. The granting of planning permission for the extraction of 749,000 tonnes of sharp sand and gravel at Homers Farm would increase the total landbank in the county by 0.5 years and the landbank for sharp sand & gravel by 0.8 years. The proposal would also help to replenish existing reserves that have been worked during 2014. Given this, Officers consider that the proposal satisfies the requirements of Policy MA1 by contributing to the need to maintain continuity of supply in terms of an appropriate landbank and increasing

the amount of concreting aggregate reserves for which there is an urgent and pressing need.

ENVIRONMENT AND AMENITY

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Surrey Waste Plan 2008
Policy DC2 – Planning Designations
Policy DC3 – General Considerations
Surrey Minerals Plan 2011 Core Strategy Development Plan Document
Policy MC14 - Reducing the adverse impacts of mineral development
Spelthorne Borough Core Strategy and Policies DPD 2009
Policy SP6 – Maintaining and Improving the Environment

84. The application site lies in close proximity to areas of ecological importance including a SSSI and SPA and is within an Air Quality Management Area which will require consideration as part of the decision making process. In addition to this, the site lies in close proximity to Heathrow Airport which has policies for safeguarding and bird strike which the proposal will need to satisfy. The application site also has high quality grades of soil and it will be necessary to consider the impact on these from the proposal.

85. Policy MC14 of the Surrey Minerals Core Strategy DPD recognises that minerals development proposals can impact on a number of environmental areas. The policy states that minerals development will be permitted only where a need has been demonstrated and sufficient information has been provided so that the minerals planning authority can be satisfied that there would be no significant adverse impacts arising from the development. The policy requires potential impacts relating to a number of issues to be considered. In relation to this proposal the relevant issues are noise, dust, fumes, vibration and illumination including that from traffic (i), flood risk and land drainage (ii), the appearance, quality and character of the landscape and any features that contribute to its distinctiveness (iii), the natural environment including biodiversity (iv), sites of potential archaeological interest or their setting (v), soil resources (vii), the need to manage risk of bird striking aircraft (viii), cumulative impacts arising from the interactions between mineral developments and between mineral and other forms of developments (ix); and any other matters (x).

86. As the proposal involves the deposit of inert waste to facilitate the restoration of the application site back to agricultural use, it is appropriate to consider policies within the Surrey Waste Plan 2008. Policy DC2 states that planning permission will not be granted for waste related development proposals where this would endanger or have a significant adverse impact on the character, quality, interest or setting of (i) Ramsar, SPAs, SACs, (iv) the best and most versatile agricultural land, (vi), national nature reserves or SSSIs, (xi) SNCIs; and (xii) local nature reserves and non-statutory nature reserves. The policy requires an assessment to take into account whether significant adverse impacts identified could be controlled to acceptable levels.

87. Policy DC3 of the Surrey Waste Plan 2008 requires the provision of appropriate information to support a planning application to demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land, infrastructure and resources. The policy requires information supporting an application to include where necessary, appropriate mitigation measures so as to minimise or avoid any material adverse impact and compensate for loss. The policy sets out a number of areas where information should be provided. Relevant to this application are (i) the release of polluting substances to the atmosphere or land arising from facilities and transport; (iii) contamination of ground and surface water; (iv) the drainage of the site and adjoining land and the risk of flooding; (vi) groundwater conditions and the hydrogeology of

the locality; (ix) adverse effects on neighbouring amenity including noise, fumes, vibration, dust and transport impacts; (x) traffic generation, access and the suitability of the highway network in the vicinity; (xi) adverse effects on agriculture; (xii) the loss or damage to flora and fauna and their respective habitats at the site or adjoining land; (xiii) the loss or damage to archaeological resources; (xiv) potential danger to aircraft from birdstrike; (xvi) any health impacts.

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88. Spelthorne Borough Core Strategy and Policies DPD Policy SP6 (Maintaining and Improving the Environment) seeks to improve the quality of the borough's environment by contributing to improving air quality within the borough, protecting and enhancing areas of existing environmental character including SNCIs, areas of landscape value and areas of open space of recreational and amenity value; and promoting improvement of poor quality environments both within the Green Belt and outside it.

89. The NPPF paragraph 109 sets out the broad terms that the document seeks to undertake with regard to conserving and enhancing the natural environment. It states that the planning system should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, geological conservation interests and soils;
- Recognising the wider benefits of ecosystem services;
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible
- Prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability

90. The NPPF Technical Guidance states at paragraph 20 that minerals planning authorities (MPAs) are expected to ensure that plan proposals do not have an unacceptable adverse effect on the natural or historic environment or human health. The technical guidance recognises that residents living close to mineral workings may be exposed to a number of environmental effects and advises that particular care should be taken in respect of any conditions attached to the granting of permission for working in proximity to communities. Paragraph 22 outlines that in some circumstances for new minerals development close to residential properties; an adequate separation distance may be required. In setting such distances, the following should be taken into account including the nature of the mineral extraction activity including duration, the need to avoid undue sterilisation of mineral resources, location and topography, the characteristics of the various environmental effects likely to arise; and the various amelioration measures that can be applied. The National Planning Policy for Waste 2014 states that landfill sites should be restored to beneficial after-uses and to high environmental standards through the application of appropriate conditions where necessary.

Environmental Impact Assessment

91. The Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (referred to here as the EIA Regulations) implement the European Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment which was adopted in 1985 and amended in 1997. Schedule 2 of the EIA Regulations identifies the types of development for which EIA may be required.

92. Prior to submitting this current application, the applicant sought a Screening Opinion under Regulation 5 of the EIA Regulations 2011 to ascertain whether the proposal fell within the requirements of EIA. The Screening Opinion adopted on 25 October 2012 recorded that in the County Council's opinion that the development was EIA development as it fell within the scope of Schedule 2 of the Regulations by virtue of the rate of extraction, the waste

disposal site area and the rate of landfilling. Consequently, an Environmental Impact Assessment has been undertaken and this application is accompanied by an Environmental Statement.

93. In October 2012, the applicant formally requested a Scoping Opinion under Regulation 13 of the EIA Regulations. The Scoping Opinion issued by this Authority set out the assessment of significant environmental effects that likely to arise i.e. air quality, archaeology, ecology, flood risk and drainage, hydrology and risk to groundwater, landscape and visual amenity, noise, transportation and traffic.

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94. The Environmental Statement has been reviewed, based on the review criteria employed by the Institute of Environmental Management and Assessment (IEMA). The statement has been found to reflect the advice given in the Regulation 13 Scoping Opinion and is considered to be compliant with Part I and II of Schedule 4 of the EIA Regulations.

Hydrology, Hydrogeology and Flood Risk

Spelthorne Borough Core Strategy and Policies DPD 2009
Policy LO1 - Flooding

95. The application area is located in an area classified as a principle aquifer which means this area has a high level of storage and supports the supply of water. There are no source protection zones within 1km of the site. The sand and gravel deposits contain significant amounts of groundwater and this is likely to be in hydraulic conductivity with surface water features in the area i.e. the Bedfont Lakes to the south. Below the sand and gravel lies London clay and this is to be used to form the impermeable clay barrier.

96. Groundwater levels were encountered at the site by drilling boreholes, at some 13m – 13.6m AOD. The groundwater table is very flat with a very low hydraulic gradient therefore the applicant states this was difficult to determine the groundwater flow direction. The applicant states that work conducted in 1998 found that groundwater flow in the application site locality occurred in a south/ south eastwards manner towards the River Thames and any flow northwards was unlikely. Additionally the reservoir to the west were unlikely to divert groundwater flow given they are formed of a clay core bund.

97. The main drainage feature in the application site vicinity is the River Thames some 4km to the south. The River Ash is some 2km to the south, the River Colne 3km to the west; and the Duke of Northumberland River and Longford River some 800m to the north. There are eight licensed abstractions within 3km of the application site and as the proposal does not involve any dewatering this would assist with protecting these abstractions. However there is an abstraction well within the centre of the application site and this would be destroyed by the proposal. The applicant recognises this and proposes to compensate the abstraction holder for their loss.

Hydrocarbon Contamination

98. The revised application outlines that there is some evidence of groundwater contamination in the locality, understood to have originated from the adjacent bulk fuel installation or pipeline through the site. This has implications for the proposed mineral extraction in terms of contamination of the mineral deposits and the creation of new exposure pathways for the contaminated groundwater. The extent of this contamination is identified in the submitted Factual Site Investigation Report, which details the method used to identify the contamination, which was via the drilling of boreholes, soil analysis, groundwater sampling, and the excavation of trial pits with soil and groundwater analysis. The contaminated area, adjacent to Working Area 1N, will now be excluded from the application as detailed above.

99. In light of this contamination, the applicant submitted a Human Health and Controlled Waters Risk Assessment (HHRA), which incorporates data collection, conceptual model showing source and receptors, contaminant linkage assessment, contaminants of concern, HHRA and triggers, operational remedial action plan and monitoring remedial action plan.

100. The proposed method of working has been amended in light of the contamination. The initial excavation of a 50m wide strip will take place in an arc adjacent to Working Area 1N, thereby avoiding extracting any contaminated mineral and so minimise the pollution risks to surface and groundwater receptors.

101. The working method proposed requires that all material removed from close proximity to the area of identified contamination is inspected on extraction for evidence of contamination (staining or odour). Should any such material be identified, it would be immediately replaced and covered by at least 0.5m of overburden. The clay barrier would then be moved into the site by 5 metres, and the same procedure followed, to ensure all contaminated soil and groundwater remains outside the clay barrier. If free-phase hydrocarbons are noted, absorbent pads/booms will be used to remove them from the surface of the groundwater, and any such material contaminated moved to a designated area on an impermeable surface. It would then be covered with polythene to protect from rainfall and surrounded by an impermeable bund to prevent run-off.

102. The County Geological Consultant (CGC) made several recommendations for changes and clarification to the HHRA, which have been made. These included installing additional monitoring wells, adding additional contaminants to monitor, defining which boreholes meant when referring to 'westernmost boreholes', stating that remediation would be required if 90% of the groundwater/soil vapour trigger level is reached in any of the westernmost boreholes, and that the emergency response would be instigated if the increase over 50% is observed within any of the westernmost wells. The CGC considers that conditions are required to ensure that further detail of issues including groundwater monitoring and the remedial action plan is agreed before extraction commences.

Hydrogeological Impact Assessment

103. The applicant submitted a Hydrogeological Impact Assessment (HIA) which examines the geology, hydrology and hydrogeology in detail, and identifies nearby receptors. It then assesses potential impacts to nearby abstractions, surface water bodies, surface and groundwater quality and nearby sensitive sites; as well as detailing monitoring and mitigation.

104. The HIA concludes that the groundwater present in the sand and gravel to be excavated is likely to be in hydraulic continuity with the surface water bodies in the area, other than the reservoirs. As noted, groundwater is likely to flow south/south-east. Potential impacts during extraction are considered to be very limited due to the proposal to work the mineral wet without the need for dewatering, which would protect the licensed abstractions, other water sources and amenities and surface water from derogation.

105. Following restoration with low permeability inert soils, and the clay bund, a low hydraulic conductivity area would be created which may affect groundwater flow, however the modelling demonstrated that the infilling would have a negligible impact on groundwater levels and no groundwater flooding is predicted.

106. The HIA states that the shallow groundwater beneath the site will have little protection from spills from plant operations, however this can be adequately mitigated by standard quarrying good practice measures. Officers consider conditions can be imposed to this effect. It is also anticipated that suspended solids in the water would be increased during excavation, however the effects are likely to be localised to the digging area with any remaining suspension filtered within a short distance as groundwater flows into the sand and gravel.

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107. The HIA recommends that groundwater levels and quality monitoring should continue during the working.

Groundwater Flood Risk Assessment

108. As the application site is currently formed of sand and gravel and it is proposed to restore the site by placing an impermeable liner around the perimeter of the application site and then deposit inert fill, this could impact on the groundwater flow direction, i.e. the groundwater levels increase up gradient of the application site and fall down gradient (in the shadow of) the application site.

109. The applicant submitted a Groundwater Flood Risk Assessment (GFRA) which looked at the geology, hydrology and hydrogeology of the site and detailed the groundwater flow modelling undertaken. The applicant conducted a 2D steady state groundwater flow model to demonstrate how the proposed filling would impact on groundwater flow. The model showed that with the proposal groundwater levels were simulated to increase by 0.1m at a distance of 200m up the hydraulic gradient, then this would dissipate rapidly the further away from the site and that there would be no groundwater flooding. Revisions made to the model have resulted in higher simulated groundwater levels (by about 0.25m) but the relative change as a result of filling is minimal. The GFRA predicted that slightly less groundwater may be available to the south of the site, potentially affecting Clockhouse Lane Pit Lakes and Bedfont Lakes among others. However the change is considered to be very small and would be unlikely to result in any perceptible significant change. The ditches proposed as part of the restoration scheme provides mitigation against this.

Flood Risk Assessment

110. The application site is located within Flood Zone 1, which is the zone with the lowest risk of flooding. The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by applying the Sequential Test; then if necessary, applying the Exception Test; safeguarding land from development that is required for current and future flood management; using opportunities offered by new development to reduce the causes and impacts of flooding; and where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations. The aim of the sequential test is to steer development towards areas with the lowest probability of flooding.

111. Paragraph 103 of the NPPF 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 following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
- 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.

112. The technical guidance to the NPPF states that a site-specific flood risk assessment is required for all proposals greater than 1ha in Flood Zone 1. This should consider the vulnerability of the site to flooding from other sources as well as river and sea flooding, the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of the development on surface water run-off.

113. Policy LO1 of the Spelthorne Borough Core Strategy and Policies DPD seeks to reduce flood risk within the borough and sets out a number of ways the policy intends to do this including refusing applications made in Flood Zone 3 that reduce storage capacity, requiring all development proposals over 0.5ha within Flood Zones 2, 3a and 3b to be accompanied by a Flood Risk Assessment (FRA); and not permitting residential development or change of use or other 'more vulnerable' uses within Zone 3a or 'highly vulnerable uses' within Zone 2 where flood risks cannot be overcome. Spelthorne Borough Council's Flooding Supplementary Planning Document states that all land uses are acceptable within Zone 1.

114. The application site is currently undeveloped agricultural land and drainage would be dominated by infiltration with run-off likely to be limited. There are no surface water features within the application site and the nearest features are those listed above in paragraph 96. The Environment Agency flood map also shows two underground watercourses 400m west of the application site along Long Lane which are the West Bedfont Ditches. Given the distances from the surface water features it is unlikely the application site would be affected by fluvial flooding. With regard to groundwater flooding, there are no recorded instances on the site however the application recognises that given the depth of the groundwater it could be possible after a prolonged period of heavy rain that the recharge of the groundwater may occur to such an extent the water table rises above the surface.

115. The average Greenfield run-off rate for the area has been calculated as approximately 5.2l/s/ha for a 100 year return period storm and 1.6l/s/ha for the annual average storm. In accordance with the NPPF, run off from the development should not exceed that of the undeveloped site.

116. The Flood Risk Assessment submitted concludes that due to being in Flood Zone 1, the site is appropriate for the intended use as the potential for river and sea flooding is less than 0.1%, and the potential for other types of flooding is low. Run-off would be managed during the operational phase, when the site is to be worked wet, by ensuring that the site is graded to direct surface water back to the excavations, therefore there would be no increase in run-off elsewhere.

117. After completion of extraction and filling, the site would be restored to agriculture, and to compensate for the reduced permeability of the site, a series of drainage ditches around the site perimeter are proposed, which will encourage infiltration into the remaining gravel and provide storage capacity for any excess run-off. The applicant considers these ditches would be an improvement on the current situation with regards to flood risk, and will ensure there is no increase in run-off following restoration compared to the undeveloped site.

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Surface Water Management Plan

118. The applicant also submitted a surface water management plan, which details operational controls for surface water and post-restoration controls. It concludes that all practical measures will be taken to ensure that the proposals do not have a detrimental impact on surface water run-off volumes and the quality of local water resources. It re-iterates the Flood Risk Assessment in terms of the management of water during the operational phase and the creation of ditches to manage the run-off post-restoration. It also states that the risk to local water quality will be managed by the clay seal which will be installed around each extraction area, isolating operations from the wider groundwater environment, including the existing plume of contamination. It also explains that filling the site with low permeability inert waste, and the implementation of good site practice to prevent pollution incidents, will ensure there are no significant risks to local water quality.

119. The County Geotechnical Consultant has reviewed the Surface Water Management Plan, and following his advice changes were made to the original draft to be consistent with the management measures outlined in Section 8 of the HHRA. The Consultant is now satisfied with the second revision of the Surface Water Management Plan.

Conclusion

120. The Environment Agency were consulted and have no objections to the application, if certain conditions are imposed. Those conditions are for a scheme comprising of a risk assessment, site investigation scheme, results and verification plan for each phase of the development to be approved; a verification report demonstrating completion of works set out in approved remediation strategy approved before each phase; the submission of a remediation strategy should contamination be found; the prevention of infiltration of surface water drainage into the ground; and a condition requiring the development is carried out in accordance with the applicant's Flood Risk Assessment.

121. Spelthorne Borough Council Environmental Health Officer (EHO) has noted that the responsibility for assessing current pollution to controlled waters lies with the original polluter and should be enforced by the Environment Agency and that the Remedial Action Plan proposed by ESI does not include any proposals for groundwater remediation and is merely considered in terms of aggregate extraction and restoration of the site. They recommend that once excavation is close to the plume, an environmental consultant should be present on site to accurately identify the edge of the plume/contaminated material. They also consider that once the extraction reaches the vicinity of the plume, the nominated boreholes should be monitored at a greater frequency than quarterly. Once the impermeable material is laid and the plume becomes restricted regular monthly monitoring should be carried out to establish the effect of the infilled material. The EHO also suggests that boreholes to the east and south-east should also be monitored (BH6, BH7) to ensure that plume is not being pushed to the east. The County Geological Consultant has seen the EHO's comments and advises that his conditions covering the detail of the Groundwater Monitoring Plan would cover the requirements of the EHO, who would also have a further opportunity to be consulted on the detail at that stage.

122. The County Geological Consultant is satisfied with the changes that have been made to the documents following his recommendations, though has advised that several conditions are necessary to cover further detail needed before extraction can commence. The Consultant has noted the conditions recommended by the Environment Agency, and has advised that some of his conditions, and the changes to the documents that have already been undertaken, incorporate the first three of five conditions that they have recommended. To avoid duplication therefore, Officers intend to use the Geological Consultant's conditions, which cover an Operational Management Plan, baseline Groundwater conditions, groundwater monitoring plan, installation of additional monitoring

boreholes, verification report on groundwater quality and a condition regarding previously unidentified contamination should any be found. The remaining two conditions proposed by the Environment Agency will also be used which concern surface water drainage and flood risk. The Environment Agency are satisfied with this approach.

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123. Officers are therefore satisfied that, with the imposition of the recommended conditions, the development will not have a significant adverse impact upon the local groundwater or increase the risk of the hydrocarbon plume contamination becoming more widespread. Officers are satisfied that the development will not increase flood risk at the site or elsewhere, and will in fact have a beneficial effect with the proposed drainage ditches being installed. Officers therefore consider that the proposal is in accordance with planning policy on these matters.

Noise and Vibration

124. The NPPF paragraph 123 states that planning decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development and to mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise. The NPPF technical guidance provides specific advice with regard to noise emissions from minerals development. Paragraph 28 of that guidance states that where there are unavoidable noise emissions, these should be controlled, mitigated or removed at source with MPAs setting their own appropriate noise limits. Paragraph 29 requires minerals development proposals to be accompanied by a noise emission assessment which should identify all sources of noise alongside including the proposed operating locations, procedures, schedules and duration of work for the life of the operation.

125. Paragraph 30 outlines for minerals development proposals that a noise limit at noise sensitive receptors should not exceed the background level by more than 10dB(A) subject to a maximum of 55dB(A) Laeq (average continuous noise level), 1h (free field) for daytime operations and a maximum of 42dB(A) for night time limits. The paragraph recognises where tonal noise contributes significantly to the total site noise, it may be appropriate to set specific limits for this element. Also peak or impulsive noise such as some reversing bleepers may also require separate limits that are independent of background noise. With regard to temporary activities which form part of minerals development such as soil stripping, the construction and removal of bunds and road construction, paragraph 31 recognises that these aspects can be particularly noisy but short term activities that cannot meet the limits set for normal operations. In these cases, the technical guidance advises that there be a temporary daytime noise limit of up to 70dB (A) Laeq 1h (free field) for periods of up to eight weeks in a year at specified noise sensitive properties.

126. As outlined above, Policy MC14 of the Surrey Minerals Plan requires adequate information to be provided with regard to noise alongside mitigation measures where appropriate. Policy EN11 (Development and Noise) of the Spelthorne Borough Core Strategy and Policies DPD seeks to minimise the adverse impacts of noise by requiring development proposals that may generate unacceptable levels of noise to include measures as to how this would be reduced to an acceptable level; requiring appropriate noise attenuation measures where this can overcome unacceptable noise impacts and if not development would be refused.

127. Surrey County Council has produced its own Guidelines for Noise Control: Minerals and Waste Disposal. The guidelines set out noise limits for site preparation and restoration, processing plant and mobile operations such as aggregate extraction. The guidelines echo the NPPF technical guidance with regard to site preparation and restoration works that these activities can generate high noise levels but noise exposure for any one location will

normally be limited to a short period of time. Table 1 sets out noise limits for site preparation and restoration these being:

	Max free field Laeq (1/2 hour) dB(A) Ground Floor Level	**Max LA01** dB(A) free field**
Monday – Friday 0800-1700	70	75
Monday – Friday 0730-0800 1700-1830	60	65
All days 1830-0700 Saturday to 0730	45#	50#
Saturday 0730-0900* Saturday 0900-1300 Saturday 1300-1830	60 65 50	65 70 55
Sundays and Bank Holidays 0730-0900* 0900-1300* 1300-1830*	 50 55 50	 55 60 55

Measured at bedroom level (free field)

* Such work will only be permitted in exceptional circumstances

** LA01 – where noise is exceeded for just 1% of a period and can be regarded as a measure of the noisiest event

128. With regard to the extraction of aggregates at a mineral site, the guidance states that every effort should be made to operate the site to minimise noise at all times for example working below the face. Table 3 of the guidelines sets noise limits for these operations:

	Free field #Laeq dB(A)	**LA01 dB(A)**
Monday – Friday 0730-0830 0830-1700 1700-1830	 LA90 +5 LA90 +10 LA90 +5	 LA90 +10 LA90 +15 LA90 +10
Saturday 0730-0900 0900-1300	 LA90 +5 LA90 +10	 LA90 +10 LA90 +15
Other times*	LA90	LA90
Short term noise (max 2 wks) Monday – Friday 0830-1700	 LA90 +15	 LA90 +20
Saturday 0900-1300	 LA90 +15	 LA90 +20

* It is not envisaged that work that will raise existing noise levels would be permitted outside these hours.

Where existing background levels are above LA90 = 45 dB (A) the noise from the working will be limited as if the LA90 (background noise) was 45 dB (A).

129. As no static plant is proposed for this site (the mineral is to be transported to Hengrove Farm for processing) this element of the Surrey Noise Guidelines is not relevant here. A noise assessment was submitted as part of the ES for this planning application. This assessment measured daytime noise levels however the assessment did not highlight the early morning times for monitoring as due to the high traffic levels on the A30 at that time of day, it was considered the noise levels would be the same for early mornings as the rest of the day. However, the assessment did recognise that noise levels for Saturdays could be lower. The application considers a start time of 0730 which is later than that recommended in the NPPF, however given the proximity of housing the County Noise Consultant (CNC) considers this start time reasonable.

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130. The NPPF does not contain noise prediction methods so in the absence of detailed guidance the noise assessment has used BS5228-1:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1: Noise. General activities that will take place that would create noise would be: soil and overburden stripping, construction of the temporary bunds, mineral extraction, transport of extracted mineral to the existing processing plant at Hengrove Farm, restoring the excavated area by tipping of waste materials by HGVs and spreading by dozer; and restoring the area with topsoil using a backactor excavator. The noise assessment recognises there would be periods of overlap i.e. bund construction and soil stripping; and excavation and filling.

131. The noise assessment chose to use the approach adopted in the NPPF as the most recent guidance. The applicant conducted noise assessments at four locations in proximity to the application site and found the following background noise levels:

Position	**Location**	**Time period**	**Average dB Laeq, 15min**	**Average dB LA90, 15min**
1	No. 1 Nuthatch Close	Monday – Friday	57	46
		Saturday 0730 – 0900 0900 – 1300	 60 54	 47 45
2	Brethrens Meeting Room	Monday – Friday	63	54
		Saturday 0730 – 0900 0900 – 1300	 59 60	 52 53
3	Harrow Road	Monday – Friday	63	53
		Saturday 0730 – 0900 0900 – 1300	 61 62	 46 49
4	No. 684 London Road	Monday – Friday	61	51
		Saturday 0730 – 0900 0900 – 1300	 59 61	 46 52

132. The noise assessment states that these noise levels are generally controlled by traffic noise, aircraft movement and birdsong. Noise levels from the proposal likely to arise at nearby dwellings will depend on the method of working and the sound power levels of the plant/ machinery chosen to work the site alongside the distance between the application site and dwellings and the intervening ground. For example, hard ground such as roads or concrete surfaces are likely to reflect noise emissions as hit them than softer vegetated ground. For a worst case scenario, the assessment assessed the plant and machinery operating at the closest practical position of the proposed extraction area to each dwelling and the plant/ machinery working 100% of the time. As can be seen from the above table, the limit of using a background noise level plus 10dB as per the NPPF would exceed the

maximum noise limit of 55dB Laeq advocated by the NPPF. The applicant therefore proposes that for operations at the application site, a noise limit of 55 dB Laeq be set and complied with.

133. To provide mitigation and ensure this noise limit is complied with the applicant proposes to construct two 3.5m noise bunds – one along the southern perimeter and one along the noise western perimeter. As the bunds would take some 2-3 weeks for construction, there would be a period where the site would operate with minimal noise attenuation however, the applicant has stated that the noise limit set in the NPPF for temporary operations of 70 dB would be complied with. The noise assessment concludes that with the bunds in place the proposal would meet the NPPF noise limit of 55 dB Laeq.

134. In addition to the locations above, the applicant became aware there is a residential accommodation associated with the Sports Clubhouse situated west of Short Lane. There are no perimeter bunds being proposed along the section of Short Lane that would front towards the clubhouse. The applicant carried out noise calculations for this accommodation and found the noise levels would be:

Mineral extraction	53 dB Laeq, 1 hour free field
Infill and restoration	50 dB Laeq, 1 hour free field
Mineral extraction and infill/ restoration	55 dB Laeq, 1 hour free field

135. Consequently the noise levels are at or below the suggested site noise limits for routine mineral extraction and infill operations of 55 dB Laeq for dwellings. Additionally the noise levels for soil stripping or bund formation are predicted to be 55 dB Laeq at this accommodation which is below the NPPF guideline figure of 70 dB Laeq for temporary operations. As such the noise levels for this accommodation would meet the NPPF requirements.

136. The noise assessment also assessed the proposal in relation to road traffic noise and the increase number of HGVs travelling to and from the application site using the Calculation of Road Traffic Noise (CRTN). All vehicles would come to the site via Short Lane however there are no dwellings along this section of Short Lane that would be affected by this traffic noise. However, as there are dwellings on the A30 and vehicles would use the A30 the assessment assesses this impact.

137. The most recent data for the A30 (2011) showed there were 25,104 vehicles per day of which 3% were HGVs. The maximum number of new movements on the highway network as a result of this proposal would be 228 taking Homers and Hengrove Farm together. The noise assessment found that adding the increased number of HGV movements resulted in less than a 0.2 dB LA10 at 10m to the edge of the A30. The Design Manual for Roads and Bridges states that a noise change of 0.1-0.9 dB LA10 18 hour would have a negligible magnitude of impact, the smallest considered perceptible change. Consequently the noise assessment concludes that the proposal would not have a significant adverse impact from traffic noise.

138. The CNC has reviewed the noise assessment and concurs with the findings. The CNC comments that with the bunds in place, the proposal would meet the NPPF and the Surrey Noise Guidelines for site preparation/ restoration and day-to-day extraction and infilling activities. Additionally the CNC comments that the additional HGVs would have no discernible effect. The CNC raises no objection to the 0830 hours start time for Saturdays and 0730 hours start time for week days. The CNC recommends the imposition of conditions including one for the restriction of noise intrusive reversing bleepers. It should be noted that the noise assessment was carried out using original proposed traffic figures which were slightly lower than those now proposed, however the CNC was consulted on

the new traffic figures and commented that there are no implications on the noise assessment, as the additional traffic would have a negligible effect on overall noise levels.

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Comments from Spelthorne Borough Environmental Health Officer

139. Spelthorne Borough Council Environmental Health Officer (EHO) reviewed the noise assessment and commented that it does not provide noise information for the generator, the wheel cleaning facility, construction of the new access to the site or the erection of the site office. The EHO has queried what distance any tonal noise would become distinguishable and has queried the monitoring times and why some locations were monitored more frequently than others. Additionally the EHO has said that the conversion recommended in CRTN for a 40mph dual carriageway road into kilometres (50 kph) per hour is incorrect in the noise assessment as it has been for a single carriage road and has queried whether this would have any noise impact. The EHO also requested that a condition be imposed relating to the use of quieter or silent reversing bleepers.

140. The applicant submitted amplifying information in respect of the EHO's comments. The applicant states that for a 3 or 4 kW generator such as that proposed and given the separation distances to the nearest dwellings, the calculated noise level for the generator would be 47 dB Laeq with no attenuation. With attenuation from the noise bund this would reduce the noise level to 37 dB Laeq or less at the nearest dwellings. With regard to the wheel cleaner, this would be one which comprises water spray jets powered by a single pump to wash the wheels of HGVs that are drive up a ramp and over a series of fixed bars that allow the water to drain through. Given the separation distance to nearest dwellings, the calculated noise level for the wheel wash would be less than 55 dBLAeq whilst in use with no attenuation. With attenuation from the noise bund the noise level for the wheel waste would be 35 dB Laeq. The site office would be prefabricated and brought on to the site on a HGV flat bed and lifted into place. This activity would generate a noise level of less than 55 dB Laeq and would also only take a few hours.

141. The construction of the new access to Short Lane would fall under the temporary works category as it would take a few weeks and form part of the initial commencement phase. The applicant states that the noise level for this activity using a dozer or roller with no attenuation would be 58 DB Laeq reducing to 55 db Laeq given the intervening soft ground for attenuation. This would be below the NPPF guidelines of 70 dB Laeq for temporary operations.

142. With regard to tonal noise, the applicant has commented that the distance in hearing any tonal noises depends on the background noise. In areas subject to road traffic noise, a separation distance of about 100m of less would be relevant and for the application site with plant associated with extraction/ restoration operations, the applicant states that a distance of at least 70m from dwellings adjacent to the main A30 and the machinery would be appropriate. The applicant has confirmed that quieter reversing alarms would be used on site and this can be controlled by way of condition.

143. With regard to the additional noise measurements carried out, the applicant has confirmed that the additional measurement at Nuthatch Lane was undertaken because this was seen to have the lowest measured background noise levels from the previous eight measurements at the four selected measurement locations. The other additional measurement at 684 London Road was where there had been pavement works previously. With regard to the speed limit on the A30 in kilometres per hour for the benefit of calculations in CRTN, the original noise assessment assumed a speed of 50kph (as there is a 40mph speed limit) generated a 0.15 dB(A). However, as pointed out by the EHO this speed is incorrect as being a dual carriageway it would generate additional noise, therefore the speed used in the calculation should be 60kph which generates a noise level of 0.13 dB(A). The applicant comments that as both of these are less than 0.2 dB (A) these noise levels are negligible which is as set out in the noise report and

therefore this would not result in any significant adverse harm. No further comments from the EHO have been received in respect of these points.

Conclusion

144. Officers consider that with the noise mitigation measures in place in the form of the perimeter bunds and given the existing background noise level, together with the imposition of noise conditions, that noise from the proposal both during the preparation and restoration works alongside the operational works can be adequately controlled and the proposal meets the requirements of the NPPF technical guidance, Policy MC14 of the Surrey Minerals Plan and Spelthorne Borough Core Strategy and Policies Development Plan Document February 2009 Policy EN11.

Air Quality and Dust

145. The primary driver for air quality management is the protection of human health, in addition to impacts on wildlife habitats and vegetation. EU legislation on air quality forms the basis for national UK policy on air quality. A new Air Quality Directive 2008/50/EC (Ambient air quality and cleaner air for Europe) was adopted in June 2008 and had to be implemented by Member States, including the UK, by June 2010. The Air Quality Standards Regulations 2010 implement the limit values prescribed by the Directive 2008/50/EC. The Environment Act 1995 requires the UK Government to produce a national air quality strategy containing standards, objectives and measures for improving ambient air quality and to keep these policies under review. The Air Quality Strategy (AQS) 2007 for England, Scotland, Wales and Northern Ireland sets out the Governments policies aimed at delivering cleaner air in the UK.

146. Air quality in the locality of the application area is heavily influenced by road traffic emissions alongside emission from the nearby Heathrow Airport. The predominant wind direction is from the southwest with other frequent winds coming from the west, south southwest and west southwest. The whole of the borough of Spelthorne is in an Air Quality Management Area (AQMA) being designated for nitrogen dioxide since 2000. In 2004 following the last stage of the first round of Review and Assessment, it was concluded that predicted exceedance of the NO2 objective for the 1-hour mean was unlikely to result in members of the public being exposed to elevated levels of NO2. Consequently the designated AQMA in respect of the NO2 1-hour mean was revoked but the AQMA in respect of NO2 annual average objective remains. The primary source of NO2 is from road traffic with the second largest from domestic sources and this is echoed within the Spelthorne Core Strategy and Policy DPD with the main road corridors being the worst affected areas.

147. Policy SP6 of the Spelthorne Borough Core Strategy seeks to maintain and improve the quality of the environment of the borough. The policy sets out criteria to achieve this of which criteria b) seeking to improve air quality in the borough is the most relevant. Policy EN3 (Air Quality) sets out measures for improving the air quality and minimising harm from poor air quality including (relevant to this proposal) requiring an air quality assessment for development proposals that involve a large number of vehicle movements and refusing development where the adverse effects on air quality are of a significant scale either individually or in combination with other proposals and are not outweighed by other considerations.

148. As set out above, both Policy MC14 of the Surrey Minerals Plan and Policy DC3 of the Surrey Waste Plan seek to ensure that minerals and waste proposals do not cause significant adverse harm with regard to dust or air quality. Paragraph 124 of the NPPF states that consideration to should be given to the presence of AQMAs and the cumulative impacts on air quality from individual sits in local area and that planning decisions should

ensure that any new development in AQMA should be consistent with the local air quality action plan.

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149. Since the AQMA was designated, Spelthorne Borough Council has produced Action Plans as to how air quality can be improved. In its Air Quality Monitoring Overview for 2012, it states that for NO2 there has been a trend that some monitoring sites within the borough having raised NO2 levels from 2011 and others being lower. Sites where NO2 levels have increased that are in the locality of the application site are Church Road, Ashford; and the Crooked Billet Roundabout. Monitoring for the past four years at the Bedfont Road/ Long Lane monitoring location shows that the objective for annual mean NO2 concentrations has been falling but is higher than the objective. However the most representative monitoring site for the application site is that at Ashford Hospital and this shows below objective levels. This report also looks at PM10 stating that there is a general downward trend of reduced concentrations and monitored levels being below the annual and daily thresholds. There is no obligation to monitor PM2.5 however this is done at Oaks Road, Stanwell, which also shows a downward trend since 2003.

150. The applicant submitted as part of the Environmental Statement an Air Quality Assessment which includes an assessment of potential impacts on local air quality from dust and fine particle emissions; and from traffic associated with the proposal. Consideration of dust is below and this section will assess the implications of the proposal on air quality from traffic emissions. This assessment document shows that estimated background concentrations in the area of the application site for both NO2 and PM10 are both estimated to be below the objective limit of 40µm/m3.

Road Traffic Emissions

151. The proposal would give rise to a number of HGV movements alongside light vehicle movements at the application site and in the vicinity of the site that are currently not present. The Environment Protection UK (EPUK) guidance states that a change in traffic movements of 200 HGV movements per day would trigger the need for a quantitative assessment of traffic emissions as this could have a significant effect on air quality. As outlined above the proposal would generate a maximum average of 132 two way HGV movements at Homers Farm and a maximum average of 128 at Hengrove Farm, both during the period June 2016 – November 2018. There is a period where there would be an average of 176 movements per day at Hengrove, though 100 of these are already permitted for the restoration of the site so should not be considered as part of this application.

152. While those figures are below the 200 threshold for each site, the applicant was requested to undertake an assessment of any potential cumulative impacts from the two sites on dust and air quality associated with traffic emissions. Paragraph 6.35 of the Surrey Minerals Plan Core Strategy 2011 states that the issue of cumulative impact is an important one in areas that are already under significant development pressure, or have concentrations of several existing and potential mineral workings. The paragraph goes on to state that cumulative impacts may, for example, arise where mineral sites that are in close proximity to each other would be worked at the same time or where working has taken place over a long period of time.

153. A cumulative air quality assessment was originally undertaken and submitted in 2013, which identified a four month period where cumulative impacts on air quality could occur over the 200 threshold, while Hengrove Park was being filled as well as the start of works on Homers Farm. However this was not considered to significantly affect air quality, and this period is no longer relevant, as filling at Hengrove Park has now been completed. Revised traffic figures were submitted in September 2014, because the time taken to determine the application meant that work had not commenced when originally anticipated. The revised figures now indicate that the peak flow would be 208 vehicles per

day occurring between July 2016 and November 2018, which again exceeds the 200 threshold. Therefore, the applicant has assessed the cumulative impact of these new figures.

154. The cumulative assessment showed that using the most recent data for the A30 (2011) there were 25,104 vehicles per day of which 3% were HGVs. When adding the new proposals to this traffic flow, the daily peak vehicle flow represents an increase of less than 0.8%, less than a fifth of the EPUK threshold criterion and below the EPUK threshold of 5% in an AQMA, above which an air quality assessment would be required. Therefore based on this the cumulative impact of the HGVs proposed, this would not lead to a significant adverse impact upon air quality. Furthermore the applicant conducted an assessment of the proposed emissions from these vehicles compared to those on the road network and this found that the emissions would have a negligible impact.

155. The County Air Quality Consultant concurred with these findings that the cumulative effects are not significant and that any further air quality assessments would not be required.

156. Spelthorne Environmental Health Officer (EHO) has commented that the application refers to the applicants company fleet of lorries as “environmentally friendly 44 tonne articulated lorries and requested a definition of why they fell into that category for example do they meet a EURO class. The applicant has confirmed that the fleet would meet Euro 5 classification (classifications are 1 –6) and are able to go into the London Low Emission Zone. The EHO has requested a condition on this point, which Officers propose. The EHO also commented that extraction should commence only when Hengrove filling is complete, however this is no longer relevant as the filling has already been completed. They also requested that the routing of HGVs be controlled by condition, which is covered by the S106 routing agreement appended to this report.

Dust

157. Paragraph 144 of the NPPF states that unavoidable dust and particle emissions should be controlled, mitigated or removed at source. Further detail on Government policy and consideration specifically with regard to dust from mineral working is set out within the NPPF Technical Guidance. Dust from surface mineral operations is a material planning consideration. The NPPF Technical Guidance describes dust as particulate matter in the size range of 1-75µm (micrometers) in diameter and that particles less or equal to 10µm in diameter are referred to PM10. The NPPF Technical Guidance advises that a Dust Assessment Study should be undertaken to accompany minerals development applications and that such a study may use a quantitative approach or qualitative approach. The NPPF Technical Guidance states that if there are residential properties (or other sensitive uses such as hospitals) within 1000m of the actual source of emission (e.g. haul roads, crushers, stockpiles) on the mineral workings (as is the case with this application), then the Dust Assessment Study should additionally consider the concentrations of dust particles suspended in the air (PM10) that can potentially have effects on human health.

158. Policy MC14 of the Surrey Minerals Plan and Policy DC3 of the Surrey Waste Plan both seek to protect the environment and residential amenities from the impact of dust from proposals.

159. Also of some relevance is The Mayor of London’s Best Practice Guidance (2006) for the control of dust and emissions from construction and demolition. Whilst this proposal does not specifically relate to construction and demolition activities, many of the principles and mitigation measures outlined within the guidance note can be seen as relevant to this proposal. The Guidelines sets out mitigation measures for sites where dust may be generated including ensuring machinery and dust causing activities are located away from

sensitive receptors; hard surfacing site haul routes; putting in place real-time dust monitors across the site; effective vehicle cleaning and dampening down of haul routes; the covering of all loads entering and leaving the site; using water as a dust suppressant where applicable; covering stockpiles to prevent wind whipping; and re-vegetating earthworks and exposed areas.

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160. There are two issues concerning airborne sand from quarries – the impact upon residential amenity by causing a nuisance; and the impact upon health. PM10 is associated with effects on human health and only make up a small proportion of the dust emitted from most mineral workings. These are deposited slowly and may travel 1000m or more from the source but their concentration will decrease rapidly on moving away from the source due to dispersion and dilution. Larger particles (greater than 30µm (µ = microgram)) make up the greatest proportion of dust emitted from mineral working and will largely deposit within 100m of sources with intermediate particles (10 - 30µm) being likely to travel up to 200-500m. Large and intermediate particles are often referred to as *nuisance dust*.

161. Dust emission, dispersion patterns and impacts are difficult to predict due to the varying activities that are carried out within quarries and the surrounding topography. Additionally dust impacts will vary according to the scale of operations, the nature of the mineral, the length of operation and the activities undertaken at the site. The main sources listed within the Environmental Statement are topsoil and overburden stripping and storage, the extraction and landfilling processes; and the loading and unloading of mineral/ inert waste to/ from the site. Emissions from hard surfaced roads from vehicles can be a source of dust should there be any loose material lying on the surface and if there were no appropriate dust control measures.

162. The application area is some 10.5ha and would be worked in five phases commencing extraction with the perimeter of the application site and the operational/ parking area and then progressing in an anti-clockwise manner in the centre of the site. During the initial soil stripping operations, landscape screening bunds would be constructed along the south eastern edge and north western edge of the application site and temporary stockpiles of separate top soil and subsoil would be within the southern half of the central area moving to the northern half of the central area as working progresses. Soil stripping and bund construction would be achieved using an excavator and dump trucks with the bunds formed into shape using the excavator and bulldozer. The bunds would then be seeded as soon as possible following construction to minimise the potential for dust emissions.

163. It is anticipated that stripping of the soils and extraction of the mineral from the site would be carried out in the same manner as at the existing Hengrove Farm and Hengrove Park using a 360o excavator and dump truck. The as-dug sand would then be taken to the stacking area within the operational area to allow for it to drain before being transported off site to Hengrove Farm by HGV. Progressive restoration would then be carried out behind the extraction area by infilling the site with inert waste.

164. The closest receptors to the application site are fuel depot the north and the Brethrens Meeting Room to the east as these lay immediately adjacent. The closest residential properties are those to the south on London Road laying approximately 34m south of the bund and 50m from the extraction area. The other nearest properties are the property in the sports centre to the west laying some 100m from the extraction area; properties in Nuthatch Close to the north west some 56m from the bund and 64m from the extraction area; and 778 Staines Road to the east approximately 76m to the bund and 94m to the extraction area. In addition to the aforementioned sensitive receptors, the proposed development is located near to sensitive ecological sites including the Staines Moor SSSI, the SW London SPA and Ramsar site; and the Princes Lake and Bedfont Lakes SNCIs.

165. The assessment submitted in the ES concludes that all of the activities associated with the proposal have the potential to cause dust and therefore the site is considered to be a high risk site for dust emissions with dust impacts likely to be of moderate adverse significance in the absence of mitigation measures. For PM10 baseline data the assessment has used local air quality monitoring data and estimated background concentrations in the area from Defra. For nuisance dust, the assessment considers typical UK levels and the results of monitoring undertaken at Hengrove Farm during the extraction and filling operations. As such, wind direction has a major part to play in creating nuisance dust. The assessment within the ES showed that the predominant wind direction is from the southwest occurring 10.9% of the time with winds from the west, south southwest and west southwest also occurring frequently. Potentially significant airborne dust emissions are generated from wind speeds greater than 10 knots (5 m/s). The assessment states that the annual average wind speed (all directions) for this site is 4.0m/s.

166. The applicant has conducted an assessment to ascertain whether, given the prevailing wind direction and speed, the proposal would have a significant adverse impact from nuisance dust and PM10. The assessment found that given the frequency and direction of moderate winds, receptors that would be affected by dust should no mitigation measures be in place would be the oil storage facility to the north and the Brethren Meeting room to the east. However the storage facility is an industrial use and the meeting house is a community facility that is used infrequently therefore both of these receptors were considered in the assessment to be of low sensitivity. The closest residential receptor that would experience high frequency winds is 778 Staines Road and due to its proximity and the prevailing wind direction the assessment concluded there would be a high possibility of experiencing dust problems at this property.

167. To minimise the potential impacts on air quality, the applicant has stated that the proposal will be operated in accordance with best practice guidance, which states that dust emissions can be controlled by effective site management. In addition the applicant proposes the following dust mitigation measures:

- Minimising the duration of time for top-soil/ subsoil removal, bund construction, soil storage and replacement
- Avoiding handling of soils during adverse weather conditions (i.e. high winds)
- Continual monitoring of site operations likely to cause the generation of dust within the site boundary and all findings including recording of prevailing weather conditions
- Progressive restoration of minimise the area exposed to wind erosion
- The provision and maintenance of water supply on site for water spray equipment
- Minimisation of drop heights
- Use of water sprays on stockpiles when necessary
- Minimising drop heights
- The installation, use and maintenance of wheel and tyre cleaning equipment at the site entrance
- A maximum speed limit of 20mph on site
- The construction of perimeter soil bunds and seeding of the bunds to grass alongside the planting of shrubs and hedges. The grading of the bunds to minimise wind-blown dust
- The operation of a complaints response system for the public to call if there is a dust incident
- Haul road to be regularly maintained by sweeping, grading or use of water bowsers

168. Furthermore, as the application area is to be worked wet with no dewatering, this would allow for extracted mineral to retain a high moisture content level and allowing stockpiles to form a crust reducing the ability for mineral particles become wind-blown dust. The stockpiles would be placed within areas of the site to take advantage of the site topography and bunds to provide shelter from winds.

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169. The County Air Quality Consultant (CAQC) has reviewed the submitted Air Quality Assessment which forms part of the ES. The CAQC has commented that the submitted air quality assessment considers both of the key issues: nuisance effects of the deposited fraction of dust and the potential health effects of PM10 fraction of suspended dust as required by the NPPF Technical Guidance. The CAQC also considers that the air quality assessment covers all of the key stages set out in the NPPF Technical Guidance for such an assessment and is satisfied with the approach taken with regard to the collection of baseline data and that sensitive receptors within the requested distance have been considered. With regard to the assessment and results of both deposited dust and PM10 the CAQC is satisfied with the approach taken and the findings and raises no objection to the proposal on nuisance dust or PM10 grounds and considers the assessment submitted meets the requirements of the NPPF Technical Guidance.

170. The CAQC reviewed the mitigation measures outlined in air quality assessment and commented that whilst the measures, if implemented, are likely to give a reasonable level of control the CAQC recommended that the applicant provide further information on whether any additional measures could be employed at the application site such as using the topography of the site to provided sheltered areas. The CAQC recommended that the most appropriate method of achieving this would be through the submission and implementation of a Dust Action Plan (DAP) which could be conditioned as part of any permission granted alongside a programme of ongoing monitoring to check the continual effectiveness of the control/ mitigation measures.

Dust Action Plan

171. The applicant subsequently provided a DAP as further amplifying information to the planning application. The DAP sets out what activities could generate dust and how these activities would be modified to reduce dust emissions. Additionally the DAP provides a summary of dust control measures and estimates of effectiveness of each measure. There is a commitment within the DAP to carry out regular monitoring and inspections of the haul road and site throughout the working day and of meteorological conditions. The DAP states that where visual monitoring, including meteorological monitoring, identifies that site activities are, or likely to, be the source of dust impacts off-site that may give rise to annoyance or nuisance, actions including temporarily halting operations that were identified as causing or likely to cause the dust impact/ nuisance; using additional dust suppression measures such as dampening surfaces; relocating activities to a more distant location will occur.

172. In addition to the above, the applicant proposes to implement a dust monitoring scheme (detailed within the DAP) to monitor the performance of the dust mitigation measures. The monitoring scheme has been developed in accordance with the Environment Agency M17 Guidance document. The CAQC has reviewed the submitted DAP and has commented that the document contains all the key components of a Dust Action Plan and that it requires no further work and can be approved as part of this permission.

173. The EHO also reviewed the DAP and asked for clarification as to whether the guideline deposition value of 200 mg/m2/day would be revised following initial baseline monitoring and whether the location or number of monitoring stations would be revised in line with the results obtained or complaints received. The CAQC points out that in Section 5.0 it already makes provision for varying the monitoring scheme and action plan in light of complaints, though the applicant has confirmed in the Addendum to the DAP that the deposition value of 200mg/m2/day would be revised if necessary. The EHO also asked for clarification of who should be contacted in the event of dust complaints, and who was responsible for dust monitoring at the site. These have also been addressed in the Addendum.

Cumulative Impacts

174. With regard to dust and particles, given the separation distance between Homers Farm and Hengrove Farm, the air quality assessment concludes there would be no cumulative impact from the two sites. The CAQC concurs with this conclusion.

Air Quality Conclusion

175. Officers note that there are several potential ways in which the proposal could affect air quality, and that in the absence of mitigation measures, the dust impacts would be considered to be of moderate adverse significance. However, the assessments undertaken show that road traffic emissions are not significant in air quality terms, and mitigation measures and monitoring proposed in the Dust Action Plan, along with conditions to ensure compliance, will help to ensure that none of the other sources of air pollution will have a significant adverse impact upon the site and locality. Officers therefore consider that the proposal is acceptable in Air Quality terms.

Ecology

176. As outlined above, Policy MC14 requires consideration to be given to the impact of minerals development proposals on the natural environment and biodiversity. Policy MC2 states that mineral development that may have a significant effect on Special Areas of Conservation, Special Protection Areas or sites identified under the Ramsar Convention will be subject to appropriate assessment. The policy goes on to state that permission will not be granted where there is any likelihood of adverse impact on the integrity of the area. The policy further states that mineral development that may have a direct or indirect significant adverse impact on a Site of Special Scientific Interest will be permitted only if it has been demonstrated to be in the public interest; and the applicant can establish that development and restoration can be carried out to the highest standard and a manner consistent with safeguarding the specific relevant interests.

177. Policy EN8 of the Spelthorne Borough Core Strategy and Policies DPD seeks to protect the biodiversity of the borough by safeguarding sites of national and international importance, ensuring new development, wherever possible, contributes to an improvement in biodiversity and avoids harm to features of nature conservation interest; and refusing planning permission where development would have significant harm on features of nature conservation interests. The NPPF paragraph 109 requires the planning system to aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged

178. As part of the Environmental Impact Assessment, an Extended Phase 1 ecological survey was conducted of the site to look at the potential impact of the proposal on protected species and designated ecological sites within the local area.

Designated statutory and non-statutory ecological designations

179. As outlined above, there are a number of statutory and non-statutory ecological designations within the vicinity of the application site including the South West London Waterbodies RAMSAR and SPA site covering the King George VI and Staines Reservoirs to the west, the Staines Moor SSSI (which includes Shortwood Common) beyond the reservoirs to the west and south; the Bedfont Lakes County Park LNR and SNCI to the south east; and Princes Lake SNCI to the south. The ecological survey concluded that the proposal would have a negligible impact on the designated sites due to the significant distance between the site and the boundaries of the SSSI, SPA and RAMSAR sites. Indirect impacts in the form of noise and dust were considered unlikely to affect the

statutory sites given the distance between them and Homers Farm, and it was concluded that increased vehicular traffic would not be a problem, bearing in mind the steep sided slope that forms the boundary of the SSSI and A30, which would minimise the disturbance. It was also concluded that because of the distance between the SNCI to the south and Homers Farm, and the fact that the A30 and a number of industrial units lay between the two sites, that the proposal is unlikely to have any impacts on the SNCI either.

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180. Natural England raise no objection to the proposal with regard to the designated sites stating that they consider the proposal would not damage or destroy the interest features. The County Ecologist concurs with the findings with regard to the RAMSAR, SPA and SSSI designated sites. The County Ecologist originally raised concern with regard to the potential for the proposal to alter the groundwater regime to and in Princes Lake should an impermeable clay liner by placed around the periphery of the application site and requested clarification on this. The County Geologist has confirmed that although it is possible that slightly less groundwater will be available to the south of the site, the impact is considered to be very small and unlikely to result in any significant change in lake levels. Mitigation against this has been designed into the restoration scheme with the majority of the direct runoff being directed to groundwater seepage drains in the south of the site. The County Ecologist has confirmed that they have no objections on this basis.

Protected Species

181. The Extended Phase 1 ecological survey assessed the vegetation within and immediately adjacent to the site to gauge whether the application site is suitable for bats, breeding birds, badgers, dormice, reptiles, great crested newts and invertebrates. The ecological survey found with regard to dormice, reptiles and great crested newts that there was no evidence of these species on site and the application site had low potential for supporting such species. With regard to badgers, the survey found no evidence of them on site and considered there would be low potential for them. However, the survey did recommend that prior to the commencement of any development, a survey should be carried out to check if any badgers are present. The Ecologist agrees with this recommendation and Officers consider it can be secured by condition.

182. With regard to bats, there are no trees on the application site. There is a mature tree which sits on the eastern boundary with the application site. Given the lack of trees on the application site, the survey concludes that bat roosting opportunities are negligible with medium potential for the site overall to support a low number of foraging/ commuting bats. Surrey Wildlife Trust have requested that bat boxes are installed on the application site post development however, given there are no trees on the site and that the proposed 10 heavy standard oak trees to be planted on the western boundary would not have matured in sufficient enough time for such boxes to be planted, this recommendation would not be practical.

183. With regard to birds the survey concludes there is medium potential for common breeding birds to nest on the application site and the survey recommends that any trees or shrub clearance is done outside of bird nesting season. The survey concludes that there is value within the site for shelter, nesting and nectar for invertebrates. The ecological survey concludes that given the application site is an arable field and there is dense scrub, the application site is not of intrinsically high ecological value and considers that the proposal would not have an significantly adverse impact on ecological value or protected species subject to relevant conditions being imposed alongside the use of native species for new planting and suitable buffers being in place to protect existing boundary hedgerow and trees.

184. The County Ecologist is satisfied with the survey methodology and findings and raises no objection to the proposal subject to the imposition of conditions requiring a badger survey, and checking the bunds for wildlife prior to removal. Surrey Wildlife Trust also concur that the survey report provides sufficient information and advised that the applicant should be required to undertake all the recommendations in Section 4.0 of the report. Officers consider that most of these recommendations have already been incorporated into the restoration scheme where it was possible, or are covered by proposed conditions.

Landscape and Visual Impact

Spelthorne Borough Core Strategy and Policies DPD 2009
Policy EN8 – Protecting and Improving the Landscape and Biodiversity

185. Safeguarding and improving the boroughs landscape is sought by Policy EN8 of the Spelthorne Borough Core Strategy and Policies DPD by refusing planning permission for development proposals that may cause significant harm to the landscape, ensuring new development wherever possible contributes to an improvement in the landscape; and safeguarding sites of importance. Policy MC14 of the Surrey Minerals Plan 2014, and Policies DC2 and DC3 of the Surrey Waste Plan 2008 also seek protection of the landscape, as detailed in paragraphs 85 and 86 above.

186. A site location description is given above in paragraphs 1 -3. As can be noted from the attached photographs, the site is open to views from the south and west as there is no boundary planting in the form of hedgerows or trees. The site is relatively flat although it does vary from around 15.44m AOD in the south east corner to 16.87m AOD in the north east corner. As outlined above the site has 1, 2 and 3a agricultural grade land and therefore falls into the category of being the best and versatile agricultural land.

187. The site lies within the Thames Floodplain Landscape Character Area as set out in the 'Future of Surrey's Landscapes and Woodlands'. The key characteristics of this character area are a low lying, flat, large scale virtually treeless landscape dominated by urban development; new developments including mineral workings and the environs of Heathrow airport are unrelated to the landscape; embankments of reservoirs, roads and railways dominate the area and form the backdrop to many views; and remnant pockets of agriculture and market gardens are fragmented by development and roads.

188. On a national scale the site is located within the National Character Area 115: Thames Valley as defined by Natural England. This character area stretches from Slough, Windsor and the Colne Valley in the west to the south west London fringes. Of the various key characteristics set out in this document, the most relevant to this site are that farming is limited and where it is, it is in a generally open, flat and featureless landscape; and "*towards London in the east, the natural character of the area is overtaken by urban influences, a dense network of roads, including the M25 corridor, Heathrow Airport, railway lines, golf course, pylon lines, reservoirs, extensive mineral extraction and numerous flooded gravel pits"*.

189. The site is located within a predominantly urban setting. However Mayfield Farm to the east is a pocket of agricultural land extending to the edge of Feltham.

190. The applicant has provided a Landscape and Visual Impact Assessment as part of the Environmental Statement and also a Landscape Management Plan as part of the planning statement. The LVIA classified the quality and value of the application site as low and the sensitivity to change as low. The LVIA states that the key visual receptors that may be affected by the development of the site include nearby residential properties, Ashford Burial Ground, Ashford Sports Club, public rights of way and users of Short Lane and the

surrounding road network. The LVIA states that in visual terms, the site is visible from publicly accessible viewpoints in the surrounding landscape from the south and west, less so from the east and not at all from north. However the LVIA states that longer views are limited by intervening buildings, other development or vegetation. As such the LVIA has given the application site a limited visual envelope.

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191. The LVIA notes that there are a number of residential properties to the south and west of the application site that have views either from ground, first and in some instances second and third floor windows. An assessment of impact from residential properties has therefore been included within the LVIA.

192. The LVIA assesses that the magnitude of impact on the landscape resource is moderate during the operational works but negligible on restoration; and that the significance of these impacts during the course of the works would be slight/ moderate reducing the neutral after restoration. This grading is given as whilst it is recognised that there would be a noticeable change during the works, the proposal would not change the essential characteristics of the area. The LVIA states that with regard to visual issues, the quality of views is generally low whilst the sensitivity of the receptors is generally high. However the LVIA says that the impact of the proposal on these receptors would be significantly reduced when mitigation is taken into account. Also that once the site is restored there would be no visual impacts and a small enhancement from the new hedge. Based on this, the LVIA concludes that given the short duration of the proposal, the provision of mitigation measures and the context of the site, that the levels of the impact are not significant.

Mitigation

193. The applicant proposes to construct two acoustic bunds – one along the southern boundary and one in the north-west corner. The position of these bunds is determined not only to provide visual screening but also noise attenuation to receptors. The bunds would be 3.5m high and would be asymmetrical in shape having a steeper slope on the inside and a gentle slope on the outside facing receptors. The applicant has used this design at other mineral working sites.

194. The bunds would provide a partial screened view of the site from residential properties as the lines of sight from first floor windows would pass over the bunds and into the site. To screen the remaining area of the site it is proposed to plant fast growing native shrubs along the bunds, for example willow, and would give sufficient height to allow for the whole of the application site to be screened from residential properties.

195. In addition to the bunds and planting on the bunds, the applicant proposes to plant a new native hedge along the south and west boundaries of the site. The hedge would be planted at the start of the works and would be retained after the site would be restored. This hedgerow would offer some benefit to biodiversity.

196. Concern has been raised regarding the impact of the proposal on the Ashford Burial Ground to the west of the application site. As can be seen from the photographs, views from the burial ground to the application site are limited given the existing dense vegetation along the boundary of the burial ground. Additionally, the Ashford Sports Club and its grounds are positioned in between the application site and the burial ground and provide a screening element.

197. There are no residential properties to the north or east of the site. To the east of the site is the Brethren Meeting room but this is not a residential property. To the south there are residential properties on the southern side of the A30. These properties are located approximately 37m from the application site boundary and are on the same elevation as the A30 but as the application site sits lower than the A30, they are positioned on slightly higher ground than the application site. To the west, approximately 95m from the

application site, is the Ashford Sports Club which has a residential unit in it. Residential properties lie beyond the sports club on Long Lane and Genesis Close and these properties are approximately 190m from the application site. There are also residential properties approximately 36m to the north-west of the application site at Nuthatch Close.

198. An addendum to the LVIA was received in response to queries raised by the County Landscape Architect in relation to the cross sections provided as part of the LVIA and the change in ground levels. In the case of the north-west corner (Nuthatch Close) houses are slightly elevated from the site. In the case of the south east corner (Harrow Road), houses are slightly below the level of the A30. The County Landscape Architect requested revised cross sections to demonstrate how changes in level outside the site affect receptors in Nuthatch Road and Harrow Road, in relation to height of bunds.

199. The amended LVIA contains an amended cross section drawing reflecting the changes in ground level in the north-west corner and south-east corner. The cross section demonstrates that with the bunding in place, views from first floor windows at Nuthatch Close and on Harrow Road would still have views into the application site during operations but that there is a reduction in the amount of the site that would be seen. However, with the planting proposed on top of the bunds, the cross section demonstrates that neither of these positions would gain a view into the application site with their lines of sight going over the application site.

200. The applicant has also provided an additional cross section showing the view from the Ashford sports club terrace and this demonstrates with planting in place, no view of the application site would be obtained. The amended LVIA concludes that the changes to the elevation drawings from the changes in ground level are not significant and as such have no overall effect on the conclusions of the original LVIA.

201. The County Landscape Architect also advised that there was an oak tree on the eastern boundary, small areas of hedge along the eastern boundary and mature trees on the northern boundary that need protection. The amended LVIA now includes a tree protection plan providing details of where the fencing would go, how long it would be there for and what it would be constructed from. This plan was further amended when the perimeter ditches were added to the restoration plan. The County Landscape Architect is satisfied with this plan.

202. The County Landscape Architect commented that the noise bund does not extend all the way along the western boundary and requested consideration be given to extend the bund southwards at least to the entrance of the sports club. The amended LVIA states that extending the bund was considered but discounted as a longer length was not necessary for noise attenuation reasons and that any view points from the west through the ‘open’ section would be limited to those travelling along the length of Short Lane which would predominantly be in a vehicle. Receptors from the Sports Club would be partially screened by existing vegetation and also the new security fence. However, to bolster the screening at this point, the applicant has provided a revised landscaping plan and now proposes to plant 10 English oak trees from the end of the north western bund, southwards to provide a visual screen to the view from the sports club.

203. In addition to the amended LVIA and the tree protection plan, the applicant has also provided a Landscape Management Plan setting out how planting proposed would be maintained and managed during the operational phase and for a period of five years aftercare. It states that the short-term objectives are for planting areas maintained so the plants become established and are kept healthy. The longer term objectives are for the hedge planting on western and southern boundaries, tree planting on part of the western boundary, tree and shrub planting on bunds A & B, and wildflower seeding areas on bunds A&B. A 3m strip of wildflowers on the southern boundary has also been added to the Landscape Proposals drawing, following comments from the restoration officer (see Restoration section below).

204. The Landscape Management Plan also details how the area will be managed, including removing invasive tree and shrub species and rubbish, and replanting gaps that may appear due to vandalism or accidental damage. It also details the maintenance procedures for five years.

205. The County Landscape Architect reviewed the Landscape Management Plan and made some comments for minor revisions. In response to these comments, the applicant made changes to the report that included a monthly matrix for each years' maintenance activities, clarification of the watering requirement, plant failure inspections, the responsible body for the implementation of the management plan clarified, a requirement to send the yearly inspection report to the County Planning Authority has been added, and a note added regarding timing of planting the bund. The County Landscape Architect is now satisfied with the Landscape Management Plan.

Conclusion

206. Officers therefore consider that the visual impact of the proposal is not significant, given the temporary nature of the proposal, the provision of mitigation measures described above, and the context of the site. Officers consider that the Landscape Management Plan will ensure that the proposed planting will be managed and maintained appropriately for the duration of the development. Officers therefore consider that the proposal is acceptable in terms of landscape and visual impact, and is in accordance with the relevant policies relating to landscape.

Birdstrike

207. Policy MC14 of the Surrey Minerals Plan 2014 outlines the need to assess the potential impact of proposals upon the danger of birds striking aircraft. As this site is in very close proximity to Heathrow Airport, this risk needs to be carefully considered. Birds are often attracted to certain types of sites, for example those with large water bodies, and certain types of plants, for example those producing berries.

208. The applicant has stated that as a company they are well aware of the hazards of birdstrike, as they operate quarries at Harlington and Sipson which are very close to Heathrow, as well as Hengrove Farm. They state they have not had any problems at these sites from flocking birds, which may be due in part to the large reservoirs north of the site, which are more likely to attract the birds. The main species of birds which are most hazardous to aircraft in this area are Canada Geese, pigeons and gulls. The potential bird attracting activities are topsoil removal and where an area of water is created during the extraction, especially in this case where there is no dewatering.

209. The applicant has stated that the aim would be to carry out the topsoil removal in each phase as quickly as possible, though the presence of people and machines on site does act as a deterrent. Subsoil removal does not attract birds as there is no food source. The bunds will be seeded, which decreases attractiveness to birds once these have grown. The numbers of birds will then be monitored and prisms will be used rather than pyrotechnic birdscarers, if necessary. Progressive restoration will reduce the amount of open water on site at one time to the minimum necessary. The inert fill used for landfilling is not attractive to birds.

210. The BAA safeguarding team have been consulted and have no objections to the proposal. Officers therefore conclude that, with the implementation of the specified measures when necessary, the proposal is acceptable in terms of birdstrike.

Archaeology

211. Policy MC14 of the Surrey Minerals Plan, as detailed above, requires consideration of the impact of development upon sites of potential archaeological interest. Paragraph 128 of the NPPF states that in determining applications, planning authorities should require an applicant to describe the significance of any heritage assets affected. The NPPF describes a heritage asset as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Paragraph 128 goes on to explain that the level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance.

212. Policies BE24, BE25 and BE26 of the Spelthorne Local Plan were saved as part of the 2007 requirements. Policy BE24 states that any development affecting a site or monument of County archaeological importance will not normally be permitted. Policy BE25 sets out a number of criteria that should be considered where development is being proposed within areas of high archaeological potential. This criteria includes an initial assessment of the archaeological value of the site, a field evaluation to be carried out prior to the determination of the planning application; a preference to preservation *in situ* or an agreement to ensure that damage to the remains is minimal; and a requirement that a condition be imposed to secure a full archaeological investigation and recording of the site.

213. Policy BE26 requires that sites that are beyond areas defined as high archaeological potential, there will be a requirement that a scheme of archaeological assessment or evaluation appropriate for the site concerns to be submitted with any new development proposal for a site larger than 0.4ha.

214. The applicant submitted with the original application a desk based archaeological assessment which included a walkover survey. This identified that there are two Schedule Ancient Monuments within close proximity of the application site however the archaeological assessment determines that neither of the setting of these SAMs would be affected by the proposal as they have already been affected by other development. Three Areas of High Archaeological Potential run up to the boundaries of Homers Farm however the archaeological assessment states that as the proposed development lies beyond any of these and would not have a direct impact on the potential sites and given the site is to be reinstated, the overall effect on the AHAPs is considered to be neutral.

215. The archaeological assessment concludes that there are a number of archaeological finds and sites located within 1km of the application site, and given this the archaeological potential for the site is considered to be high. The assessment recommends that further work be carried out to establish what finds may be present. The County Archaeologist was involved in the preparation of the archaeological assessment and concurs with its findings, which are that there is not sufficient archaeological significance to warrant preservation *in situ* of any finds or assets on the application site, but a Mitigation Strategy comprising the preservation by record of Assets present across the site is acceptable. The County Archaeologist considers this can be achieved through a programme of archaeological work comprising a Strip, Map and Sample exercise across all areas of the site where ground disturbance is proposed, followed by appropriate post-excavation analysis and publication. The County Archaeologist says there would be a need to agree a specification/ written scheme of investigation (WSI) for the archaeological work and the archaeological fieldwork should not commence until this has been agreed, and proposes a condition to this effect.

216. Officers therefore consider that, with the imposition of the recommended condition, archaeological investigation at the site will be carried out to the appropriate standard, and any archaeological finds present at the site will be satisfactorily recorded. Officers

therefore consider that the proposal meets the requirements of Policy MC14 of the Surrey Minerals Plan 2011 and the Spelthorne Borough Local Plan saved policies detailed above.

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Restoration

217. Policy MC17 of the Surrey Minerals Plan 2011 states that mineral working will only be permitted where the mineral planning authority is satisfied that the site can be restored and managed to a high standard. It states that restored sites should be sympathetic to the character and setting of the wider area, and capable of sustaining an appropriate after-use. The policy goes on to say that mineral workings should be restored at the earliest opportunity and progressive restoration will be required where appropriate.

218. Policy MC18 of the Surrey Minerals Plan states that the mineral planning authority will encourage and work with operators and landowners to deliver benefits such as enhancement of biodiversity interests, improved public access and provision of climate change mitigation such as greater flood storage capacity.

219. Policy MC3 of the Surrey Minerals Plan Core Strategy states that the need for mineral could be argued to clearly outweigh any temporary impacts of the development on the Green Belt provided that is can be demonstrated that the highest environmental standards of operation can be maintained and the site will be well restored to a beneficial after-use consistent with Green Belt objectives and within agreed time limits. In this respect, Officers consider there are a number of factors that would seem to contribute to such Green Belt objectives. These include the applicant being very experienced in working and restoring land of high agricultural quality, the proposals to restore the land to agriculture which is a suitable afteruse in accordance with the Minerals Site Restoration SPD and a commitment to complete the project in seven years.

220. The Surrey Minerals Plan Site Restoration Supplementary Planning Document (SPD) 2011 sets out the County Council's vision of how existing and proposed mineral workings should be restored in Surrey during the period to 2026. It sets out best practice in restoration techniques and presents indicative restoration schemes for all of the preferred areas for working of primary aggregates & silica sand as identified in the Surrey Minerals Plan (SMP). The Restoration SPD identifies Homers Farm as a small isolated area of high grade agricultural land, in viable arable use and that it should be restored to agricultural use, involving infilling with inert waste materials. It states that the site can contribute to the National Priority Habitat - Cereal Margins (now known as Arable Field Margins, which are strips around the edges of arable fields that provide benefits for wildlife) and Broad Habitat of Arable & Horticulture; together with Surrey's Farmland Habitat Action Plan. It states that enhancements could be provision of margins, headlands and beetlebanks around the periphery of the site in accordance with the Habitat Action Plans and notes that there are no existing hedgerows or tree cover. It considers that the use of these features could be examined, but need to be balanced against birdstrike considerations given the proximity of Heathrow. One of Surrey's Farmland Habitat Action Plan's aims is to focus attention on the existing and potential biodiversity value of Surrey's farmland.

221. The applicant proposes to complete restoration by September 2020. The Restoration Plan submitted shows that the site will be returned to farmland, but features around the edge of the site will provide biodiversity enhancements. The hedge along the western boundary of the site, as planted at the start of the works, will be retained for visual and wildlife benefits. The agricultural access will be reinstated between the oak trees planted at the start of the works, on the western boundary. The proposed access to the site for mineral extraction will be closed with a hedge planted to fill the gap and adjoin the hedges either side. The acoustic bund on the southern boundary will be removed, though the hedge along the southern boundary, planted at the start of the works, will be retained for visual and wildlife

benefits. Shrub planting and the acoustic bund on the north-west corner of the site will be removed. Drainage ditches will be installed around the perimeter of the site.

222. Surrey Wildlife Trust originally commented that the proposed restoration could offer more biodiversity value for the site and recommends the restoration be revised to include wildflower grassland areas. The applicant responded that under the terms of the agreement with the landowner, the site had to be returned to arable farming use, but agreed to put in a 3m strip of wildflowers along the southern boundary, which is shown on the updated Restoration Plan.

223. The applicant is experienced in working and restoring large areas of high-grade agricultural land in north-west Surrey and the London Borough of Hillingdon, and has holdings of land which are in arable use and farmed in-house. Restoration and aftercare costs will be provided for by revenue generated from the landfill, and the applicant has provided data which shows that this revenue will be sufficient. During the aftercare period, the land will be farmed by the company's own in-house farming operation, after which the land will be returned to the owner. It is currently farmed on a tenancy basis and it is assumed that that would continue.

224. The County Environmental Enhancement Officer has been consulted, and has no objections to the proposal, stating that the restoration is in line with the proposal in the Surrey Minerals Plan 2011 Restoration SPD. He agreed that the site has limited opportunities for biodiversity value given the size and the location, and stated that the species were acceptable and limited by birdstrike issues. Since his original comments they have added the strip of wildflowers which increases biodiversity value.

Agricultural Land and Soils

225. The Agricultural Land Classification (ALC) system is a way of classifying land according to the extent to which its characteristics impose limitations upon agricultural use. The ALC system takes into account the main physical factors influencing agricultural land quality, which are climate, site (gradient and risk of flooding) and soil, and divides agricultural land into five grades – Grade 1 being excellent and Grade 5 very poor. Grade 3 is sub-divided into 3a and 3b. Grades 1-3a are known as the 'Best and most versatile agricultural land'. Homers Farm is classified as Grade 1 overall, though the applicant's consultant has identified that there are patches of Grade 2 and 3a also within the site.

226. In the Thames Valley character area, in which this site lies, there are 2919ha of Grade 1, 2334ha of Grade 2 and 28947ha of Grade 3 agricultural land. Chapter 6 of the Surrey Minerals Plan 2011 explains that there is little Grade 1 and 2 agricultural land in Surrey, though much of it is also where sand and gravel deposits are found. It also states that proposals for mineral working on higher-grade agricultural land should plan to return land to a state suitable for agriculture even if it is not possible to restore land to its original agricultural classification.

227. Paragraphs 33-51 of the Technical Guidance to the NPPF sets out the national policy for the Restoration and Aftercare of Mineral Sites. Paragraph 40 explains that where working is proposed on the best and most versatile agricultural land, the restoration proposals should show, where practicable, how the methods used in the restoration and aftercare enable the land to retain its longer term capability, though the proposed after-use need not always be for agriculture.

228. The soil quality is described by the applicant's consultant in Appendix L of the Environmental Statement, as being a small area of Grade 1 in the centre of the site, surrounded by shallower soils, usually with gravelly material around 50-60cm below the surface which is Grade 2, and two shallower patches still which are Grade 3a.

229. Natural England were consulted on this proposal, and have not objected, explaining that they are satisfied that the site working and reclamation proposals provided in support of the application meet the requirements for sustainable minerals development, and that sufficient information was provided to demonstrate that the area of land disturbed as a result of the development would be reinstated to a similar quality, suited to a productive agricultural afteruse.

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230. Natural England commented that the soils should be ideally 1.2m depth to allow for installation of an effective piped under-drainage system and to be more likely to achieve Grade 2 land classification overall. The applicant has stated that the 1.2m top layer of fill would be free of any material over 70mm in diameter, in accordance with good practice. Above this would be a 0.2m layer of gravelly overburden, then a 0.36m layer of subsoil and then 0.34 of topsoil. The applicant proposes to restore the site with the same soils stripped from the site before extraction, and replacing them to the same depth as they are currently. Their consultant considers that the soil profile would meet the moisture holding requirements for ALC Grade 2, extending over the whole site, so would only install an under-drainage system if that proves necessary. However, following Natural England's comments, the applicant has confirmed that they will endeavour to store more suitable inert soils that come into the site for restoration for the upper layers of soil, to increase the depths of the natural gravelly overburden, subsoil and topsoil to achieve the desired 1.2m of soils.

Conclusion on restoration

231. Officers consider that the applicant has proposed an acceptable afteruse in returning the land to arable farming, and has demonstrated sufficiently that the land would be reinstated to a similar quality as at present, suitable for a productive agricultural use. Officers note that an under-drainage system would be considered if necessary to meet the requirements for Grade 2 ALC overall but that they will endeavour in any case to achieve 1.2m of soils at the surface. Officers consider that the applicant has provided some enhancements for biodiversity benefit, by way of trees, hedges and wildflowers, though accept that such benefits are limited by the proposal to return the land to arable farming, and consider that the applicant is experienced in restoring mineral sites to high quality agricultural land and note that restoration is proposed at the earliest opportunity. Officers therefore consider that the proposals are in line with Policies MC3, MC14, MC17 and MC18 of the Surrey Minerals Plan 2011.

Lighting

232. The applicant proposes that there will be 4 external lights mounted off the office cabin for the pedestrian access around the offices during the dark mornings and afternoons in winter. Strip lighting shall be used within the offices. They do not propose any floodlighting but will rely on the lights associated with the vehicles operating the site. Officers do not consider that the minimal lighting proposed will have any significant adverse impact upon amenity, but consider a condition is necessary to ensure that no further lighting will be installed without the approval of the County Planning Authority.

HEALTH AND SAFETY

233. Policy MC14 of the Surrey Minerals Plan 2014 states that mineral development will only be permitted where there would be no significant adverse impacts arising from the development.

On-site risks

234. The applicant submitted a Risk Assessment which identifies potential hazards that could occur on-site, and lists control measures in place. These hazards include working within 150m of the fuel storage tank bunds, the excavations, deep water, tipping lorries, mud on public highway, diesel and oil storage, dust and traffic. They have also produced an Emergency Evacuation Procedure in case of an incident at the adjoining Esso Fuel Depot to protect staff. The Health and Safety Executive were consulted and have no objection to the proposal, as long as the control measures in the Risk Assessment are adhered to. They have recommended a condition to that effect.

Pipelines and other apparatus

235. There is an Esso pipeline in the vicinity of the site, so Fisher German (on behalf of Esso) were consulted. They have no objection to the proposal, as long as the measures in their document Guidelines for Safe Working are followed, and the covenants in the Deed of Grant adhered to. National Grid have also been consulted and have not objected, but have noted that they have apparatus in the vicinity which may be affected, and therefore it is the applicant's responsibility to assess whether certain equipment would be affected by the proposed activities and contact National Grid in that instance. National Grid Gas were also consulted and have said that the applicant will need to liaise with them before works start to clarify their method of protecting the pipeline. Officers consider these can be dealt with by way of informatives.

236. In October 2014, Thames Water identified that they also had a pipeline running through the site, which is one of their key stored water tunnels "the Northern Tunnel" which carries water from Wraysbury & Queen Mother Storage Reservoirs to Ashford Common WTW. They stated that the tunnel had been identified through previous work as having a marginal confinement pressure ratio (CPR) and therefore no gravel extraction could be permitted until a study that looked at CPR values and tunnel impact was carried out, as any gravel taken away in the short term may cause the tunnel a significant issue leading to potential failure. Thames Water have agreed this issue can be dealt with by condition, so a condition is proposed preventing gravel extraction until the problem with the tunnel is resolved and Thames Water have agreed it can commence.

TRAFFIC AND TRANSPORTATION ISSUES

237. Paragraph 32 of the NPPF states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment with decisions taking account of whether a safe and suitable access to the site can be achieved. The paragraph goes on to state that "*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe"*. Policy MC15 of the Surrey Minerals Plan Core Strategy recognises at paragraph 7.1 that one of the most significant impacts of mineral working in Surrey and the one that can cause much public concern, is lorry traffic generated from the transportation of minerals. Paragraph 7.3 recognises that for short distances, conveyors and pipelines can be an effective alternative to lorries and are commonly used to transport mineral within sites or from one site to another nearby for processing. Paragraph 7.4 and 7.5 recognise that whilst alternative forms of transport of minerals is preferable and sustainable, the use

of rail or water are often impractical in Surrey given that the mineral is often used locally and that such methods of transport can only be used where the mineral is being transported between fixed points where there are sidings or wharves available. Paragraph 7.10 goes on to outline that where possible movement of minerals by road should be confined to the motorway or the primary road network.

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238. Surrey Minerals Plan Core Strategy states that applications for minerals development should include a transport assessment of potential impacts on highway safety, congestion and demand management. The policy requires that proposals should address alternatives to road-based methods of transport and that mineral development involving transportation by road will be permitted only where: i) there is no practicable alternative to the use of road based transport that would have a lower impact on communities and the environment; ii) the highway network is of an appropriate standard for use by the traffic generated by the development or can be suitably improved; and iii) arrangements for site access and the traffic generated by the development would not have any significant adverse impacts on highway safety, air quality, residential amenity, the environment or the effective operation of the highway network.

239. Policy DC3 of the Surrey Waste Plan 2008 requires an assessment the impact of traffic generation, access and suitability of the highway network and the impact of transport and for proposals to demonstrate that there would not be an adverse effect from such matters on local amenity and the local environment.

240. The application site is located off Short Lane, a D class road with light traffic flows and a speed restriction of 30mph. A footpath runs along the west side of Short Lane and there is no footpath on the eastern side. Short Lane meets the A30 London Road some 70m to the south of the proposed access point into the application site. The A30 is a dual carriageway trunk road subject to a 40mph speed limit which is under the responsibility of the Highway Agency, and a main arterial road into London. To the north east of the application site along the A30 is the Clockhouse Roundabout; and to the southwest of the application site along the A30 is the Crooked Billet Roundabout. At the junction of Short Lane with the A30 the only permitted traffic movements are left-in and left-out from and to the north east bound carriageway. There is a bus stop situated immediately adjacent to the left turn exit on the north east corner of the junction. There is a gap in the central reservation of the dual carriageway to allow right turns to be made from the north eastbound carriageway of the A30 towards Desford Way, a residential road on the south westbound side of the carriageway. There is a Traffic Order which prohibits U-turns to be made through this gap.

Proposed Access

241. The applicant proposed to construct an access into the application site from Short Lane. The access road would be 7.3m wide with a 15m radius provided on its southern side to facilitate an easy left turn exit from the site. The applicant states that right hand turns from the application site to Short Lane and any access from the north would be prohibited by the geometric design of the junction. The proposed access would be constructed some distance to the south of the access to the sports club entrance to ensure that that access would not be affected by the proposal.

Existing Traffic Movements

242. The applicant has provided a Transport Statement (TS) as part of the ES. The TS states that traffic surveys were undertaken for Short Lane and the A30 for northbound and southbound movements. These surveys found that for Short Lane the highest vehicle movements were during the evening peak and were 63 vehicles per hour northbound and 87 vehicles per hour southbound. For the A30 the highest vehicle movements were during the morning peak for northbound (some 1186 vehicles per hour) and during the evening peak for southbound (some 1256 vehicles per hour). DMRB sets out vehicle capacities of

roads based on the carriageway widths. For Short Lane, its capacity is of 1140 vehicles per hour in each direction and for the A30 its capacity is of at least 2600 vehicles per hour for each carriageway. As such both roads are operating under capacity.

243. The 12 hour traffic flows on the A30 at Short Lane in December 2012 were 9785 vehicles per day north eastbound of which 667 were HGVs and 10460 vehicles per day south westbound of which 571 were HGVs.

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Proposed Traffic Movements

244. The proposal seeks to extract sand and gravel and transport it from Homers Farm to the processing plant at Hengrove Farm. This is anticipated to generate some 27 loads or 54 two way movements per day between these two sites using HGVs having a 28 tonne payload. The site would also be progressively restored by using inert fill which would also generate traffic movements and this would commence some 15 months after the commencement of extraction. HGVs bringing in fill material would have a payload of 20 tonnes and this activity would generate some 39 loads or 78 two way movements. This would generate in total some 132 two way movements for both extraction and infilling. On completion of mineral extraction whilst these HGV movements would be removed, the applicant proposes to increase the number of HGVs bringing in fill material to 64 loads per day thereby sustaining the combined total number of HGVs coming to the application site until landfilling has ceased.

245. Given the existing high levels of traffic movements on the A30, an additional traffic would represent an increase of less than 1% and would not be significant. Whilst the additional movements would be more noticeable on Short Lane because the existing traffic flows on this highway are lighter, there is no frontage development on the section of Short Lane where the development proposal would be. Additionally there would be no traffic generated from the proposal during the periods when traffic flows on Short Lane are highest, i.e. evening peak.

246. The County Highway Authority (being the responsible authority for this road) initially raised concerns with regard to the impact of the proposal on Short Lane given that Short Lane currently only carries 7 HGVs per day in total and that the proposal would add an extra 132 HGV movements – an increase of 1800%. Additionally the junction of Short Lane with the A30 is by way of an uncontrolled priority junction and the CHA were concerned that an increase in slow moving, loading HGVs pulling away from the junction onto the A30 could cause a hazard. The CHA also expressed concern that no accident data had been provided for either Short Lane or the A30. As a result of the CHA's concerns, the applicant subsequently submitted accident data and assessed the impact of the proposal on the junction by way of traffic model. The CHA conducted a review of the applicant's modelling of the Short Lane/ A30 junction which showed that in terms of output it is clear that the junction is and would continue to operate well within capacity.

247. The applicant used the PICADY junction modelling software to assess the capacity of the junction of Short Lane and the A30 and to determine the potential for queuing at the junction. With regard to the junction capacity, the programme shows that currently the existing peak hour has a utilisation level of 13.6% which would rise to 16.9% with the addition of eight HGVs. This increase means that the use of the junction will increase by 3.3% but this will still leave around 80% spare capacity. There is currently no queuing experienced at this junction and the applicant states that with this assessment that would still be the case. The applicant has obtained the personal injury accident record during the last three years for both short Lane and its junction with the A30. The data shows that there have been no personal injury accidents on the first 150m of Short Lane during this period (this includes at the proposed access point to Homers Farm). At the junction of Short Lane with the A30 one accident has been recorded resulting in slight personal injury in 2009. This accident was the result of a vehicle driver emerging from Short Lane towards

the gap in the central reservation attempting to turn right onto the A30 towards the south west and misjudged the speed on the vehicle approach the junction in the offside land of the A30 and a collision occurred. It should be noted that the vehicle manoeuvre being undertaken by the driver emerging from Short Lane is a prohibited one since the gap in the central reservation is intended to be used only be vehicles travelling north eastbound on the A30 turning right into Desford Way on the south east side of the A30.

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Highway Routing

248. The applicant proposes as part of this application that HGVs upon leaving the application site and travelling to Hengrove Farm would enter on to the A30 and then travel north eastwards to the Clockhouse Roundabout. The HGVs would then travel around this roundabout and back down the A30 in a south westerly direction before taking a left hand turn off of the A30 into Hengrove Farm. HGVs transporting minerals returning to Homers Farm would be able to use the dedicated right hand turn junction in the A30 for this purpose. The Highways Agency have recommended a routing agreement be imposed prohibiting the use of the right hand turn facility from the north eastbound A30 carriageway opposite Short Lane by all HGVs associated with this proposal and Hengrove Farm whether in the applicants control or not. This routing agreement forms the basis of the S106 legal agreement which is appended to this report.

Cumulative Impact

249. The proposal for extraction at Homers Farm was originally submitted in combination with proposals for the importation of 'as raised' mineral into Hengrove Farm and the delay but then the restoration of Hengrove Farm. Since this planning application was submitted, filling of Hengrove Farm is now complete, other than the area which is proposed for processing mineral from Homers Farm. The applicant provided in 2013 a cumulative impact assessment of the potential traffic impact of all HGVs. The tables below were updated in September 2014 to reflect the current position, so there are no longer HGVs going to Hengrove Farm to bring in restoration fill, until the processing area is restored on completion of extraction at Homers Farm. The numbers of HGVs at Hengrove Farm will therefore no longer reach a maximum of 220, and the maximum will be 176 for 9 months while filling is completed. Overall, the cumulative totals have increased for most time periods (see Table 4) but this is in order that the restoration can still be completed by the same date and is not delayed. The number of HGVs associated with both sites are set out below in two separate tables:

Table 1 – Traffic Generated at Homers Farm (daily)

Period	**Homers Farm**				
	Extracted aggregates		**Restoration fill**		**Total Homers Farm**
	In empty	**Out full to Hengrove**	**In full**	**Out empty**	
March 2015 - June 2016	27	27	0	0	54
June 2016 – Nov 2018	27	27	39	39	132
Dec 2018 – August 2019	0	0	64	64	128

Table 2 – Traffic Generated at Hengrove Farm (daily)

Period	Hengrove Farm						
	Aggregates for processing		Processed export aggregates		Restoration fill		Total Hengrove Farm
	In full from Homers	Out empty	In empty	Out full	In full	Out empty	
March 2015 - June 2016	27	27	0	0	0	0	54
June 2016 – Nov 2018	27	27	38	38	0	0	128
Dec 2018 – August 2019	0	0	38	38	50*	50*	176

* These HGV movements are associated with the infilling of Hengrove Farm and are already permitted under planning permission SP12/01416 (though for an earlier date - to be completed by December 2015 under the current permission)

Table 3 – Traffic Generated at both sites together (daily)

Period	Aggregate vehicles for Homers		Processed export aggregate		Restoration fill				Total HGV movements
	In empty	Out full	In empty	Out full	In full to Homers	Out empty from Homers	In full to Hengrove	Out empty from Hengrove	
March 2015 - June 2016	27	27	0	0	0	0	0	0	54
June 2016 – Nov 2018	27	27	38	38	39	39	0	0	208
Dec 2018 – Aug 2019	0	0	38**	38**	64	64	50	50	304

** this mineral is extracted from beneath the existing processing plant and these HGV movements are permitted albeit for an earlier time frame

Table 4 – Difference between original and revised HGV figures (daily)

Time period	Original submission total HGVs	Revised submission total HGVs	% difference
March 2015 - June 2016	198	54	- 73%
July 2016 - June 2018	198	208	+5%
July 2018 - Nov 2018	170	208	+22%
Dec 2018 - August 2019*	170	304	+79%

* due to end April 2019 originally

250. The maximum number of HGV movements per day cumulatively from all three proposals would be 304 however it should be noted this is only for a nine month period. Additionally it should be noted that 100 of these HGV movements are associated with the infilling of Hengrove Farm which is already permitted under planning permission ref: SP12/01416. The longest period of time where there is a high number of HGV movements is between June 2016 to August 2019 however not all of these HGV movements will travel on the same part of the A30. During this period of time some 132 HGV movements per day would be generated from Homers Farm (extraction and infill); and some 128 HGV movements would be generated from Hengrove Farm (importation of aggregate and relating to processing mineral).

251. When taking into account the direction of travel of HGVs carrying aggregate material and assuming all the fill material at Homers Farm arrives from the west alongside 25% of the traffic relating to the export of processed materials from Hengrove Farm, a maximum of 152 HGV movements per day would be added to the section of the A30 between Homers Farm and Hengrove Farm split equality between the two carriageways. To the west of Hengrove Farm, the increase in traffic would be 138 HGV movements per day for both carriageways which would represent the fill traffic travelling to and from Homers Farm and 75% of the export traffic to and from Hengrove Farm. As noted above, the number of HGVs travelling north eastbound were 667 and 571 south westbound in December 2012. Adding 76 HGVs per day to the total traffic flows on either carriageway would represent an increase of around 1% giving the total proportion of HGVs per day of just under 8% on the north westbound carriageway and around 6.5% on the south westbound carriageway. The hourly link capacity assessment of the A30 allows for HGV content of up to 15%. Therefore the proposal would result in an increase of HGVs on both carriageway that would be less than half the capacity the A30 can carry. The Highways Agency are responsible for the A30 and they have no objection to the proposal.

252. The County Highway Authority have stated that although the revised figures mean a higher total number of HGVs at one time, and the duration of the maximum HGV movements increases from 4 to 9 months which could be seen as significant, the A30 is a busy road with capacity to carry significantly more HGVs than it does at the present time, and the extra vehicles in that context are insignificant. Additionally, some time periods will have less HGVs than in the original submission, and for the longest period of time, there will only be an additional 10 HGVs (5%) over and above the original submission. The County Highway Authority are satisfied that the proposals either individually or cumulatively would not give rise to significantly adverse effects on the public highway. They have recommended several conditions however, to cover the access construction,

protection of highway from mud, a condition survey for Short Lane, and to limit the number of HGVs to those proposed.

Conclusion

253. With regard to the requirements of Policy MC15 criteria (i) in terms of alternative sustainable forms of transport, the nearest railway line is some distance to the south of the application site. To transport mineral to the railway line would still involve the movement of mineral by HGV via the A30 and a B class road. Utilisation of a railway line would also require the construction of railway sidings at this point on the railway line. With regard to waterways, the closest waterway is the Longford River and the Duke of Northumberland River to the north. Neither of these waterways are navigable given some of the sections of the rivers run beneath culverts to enable it to run around the perimeter of Heathrow Airport. Given the above, Officers are satisfied that the use of railway or waterway is not practical.

254. With regard to criteria (ii) both Short Lane and the A30 are suitable for carrying HGVs. With regard to criteria (iii) information has been provided on the site access and Officers are satisfied, based on the advice of technical consultees, that the traffic generated by the development using the access in Short Lane would not have any significant adverse impacts on highway safety, or the effective operation of the highway network, and this can be ensured by the proposed legal agreement.

255. Officers are satisfied that the proposal both individually and cumulatively would not give rise to levels of HGV movements that would cause significantly adverse impacts given the numbers of HGVs proposed and the number of HGVs already on the highway network in the vicinity. The Highways Agency have raised no objection to the proposal on the grounds of highway safety or the effective operation of the highway network.

256. Officers are also satisfied that the other criteria under (iii) are met in that the traffic generated by the development would not have any significant adverse effects on air quality, residential amenity or the local environment, (see section on Environment and Amenity above) with the imposition of the proposed conditions at the end of this report.

GREEN BELT

257. Policies MC3 and MC17 of the Surrey Minerals Plan Core Strategy and GB1 of Spelthorne Local Plan 2001 Saved Policies seek protection of the Green Belt.

258. Policy MC3 states that mineral extraction in the Green Belt will only be permitted where the highest environmental standard of operation are maintained and the land restored to beneficial after-uses consistent with Green Belt objectives, such as nature conservation, agriculture or forestry, within agreed time limits. The policy states that development will not be permitted where it would conflict with the purposes of the Green Belt and maintaining openness. The supporting text acknowledges that almost all mineral working in Surrey is within the Green Belt.

259. Policy MC17 requires proposals for mineral working to provide for restoration and management to a high standard, with a restoration sympathetic to the character and setting of the area and the land should be capable of sustaining the appropriate afteruse. Policy GB1 of the Spelthorne Local Plan 2001 saved policies states that development will not be permitted within the Green Belt, where it would conflict with the purposes of the Green Belt and maintaining its openness.

260. Paragraph 79 of the NPPF explains that the Government attaches great importance to Green Belts, and that the fundamental aim of Green Belt policy is to prevent urban sprawl

by keeping land permanently open. Paragraph 80 goes on to explain that the Green Belt serves five purposes, which are checking the unrestricted sprawl of large built-up areas, prevent neighbouring towns merging, safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns, and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

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261. Paragraph 87 states that inappropriate development within the Green Belt is harmful to the Green Belt, and should not be approved except in very special circumstances. Paragraph 90 of the NPPF explains that certain forms of development are not inappropriate within the Green Belt, as long as they preserve the openness of the Green Belt, and do not conflict with the purposes of including land in the Green Belt. It lists mineral extraction as a form of development that is not necessarily inappropriate.

262. Given the location of the site within the Green Belt, it is necessary to consider whether high environmental standards would be maintained during operation, and whether restoration of the site will be achieved to a good standard, with an appropriate afteruse consistent with Green Belt objectives.

263. Mineral working is a temporary use of land, and minerals can only be worked where they are found. During mineral extraction, there would be some temporary impact on the visual amenities of the Green Belt, and upon openness, due to the perimeter bunds, soil stockpiles, machinery, site office and increased traffic. However, there is adequate provision in place for their removal on cessation of the extraction and restoration, and the increased traffic would cease at that time also. Therefore they are a temporary use of the land and do not permanently impact on the openness nor the visual amenities of the Green Belt which would both be restored, nor conflict with the purposes of including land in the Green Belt.

264. The site is proposed to be restored progressively to arable farmland, which is an appropriate afteruse consistent with Green Belt objectives. Officers have no reason to believe that the site could not be restored to a high environmental standard to the proposed afteruse, and note that the applicant is experienced in restoring mineral workings to viable agricultural land.

265. The need for the sand and gravel has been demonstrated above and Officers consider that high environmental standards will be achieved during the operation of the site, with the imposition of conditions as detailed in the above paragraphs. Given the temporary nature of the development and the robust provision for restoration, Officers consider that the proposal is not inappropriate within the Green Belt, and therefore is in accordance with the development plan and the NPPF with regard to Green Belt policy.

HUMAN RIGHTS IMPLICATIONS

266. The Human Rights Act Guidance for Interpretation, contained in the Preamble to the Agenda is expressly incorporated into this report and must be read in conjunction with the following paragraph.

267. The proposal involves the extraction of sand and gravel with restoration to agriculture. It is recognised that the proposal has the potential to impact on residential amenity in terms of noise, air quality, traffic, visual impact and in terms of groundwater and nature conservation. These issues have been assessed and Officers consider that the scale of the impact is not sufficient to engage Article 8 or Article 1 of Protocol 1 and the impact can be mitigated by conditions and controls under the Environmental Permit. As such, this proposal is not considered to interfere with any Convention right

CONCLUSION

268. This application is for the extraction of sand and gravel, at a site which is identified as a Preferred Area within the Surrey Minerals Plan 2011. Officers accept that there is a significant need to increase the amount of concreting aggregate reserves in Surrey, and that this site would make a significant contribution to that need from a site that is well located in terms of the market for concreting aggregate, and close to main roads for transporting the mineral.

269. The applicant undertook an Environmental Assessment which was later added to with a significant amount of further information once the hydrocarbon plume was discovered, and some of these documents have been revised further still. The concerns raised by objectors are the same issues that have been carefully considered by technical consultees, who have not objected to the development, subject to the conditions proposed.

270. The site is within the Green Belt, however policy states that mineral working need not be inappropriate, provided that it preserves openness and does not conflict with the purposes of including land within the Green Belt. Officers are satisfied that the site can be restored to high environmental standards, and to a comparable Green Belt use, and so does not conflict with Green Belt policy.

271. Officers do not consider that the proposal would have a significant adverse effect upon the environment or upon local amenity, with the imposition of the proposed conditions. Officers therefore consider the proposals are in line with the NPPF and the development plan.

RECOMMENDATION

The recommendation is to PERMIT, subject to the signing of the Section 106 Unilateral Agreement and the following conditions:

Conditions

Approved Documents

1. The development hereby approved shall be carried out in all respects strictly in accordance with the following plans/drawings:

- Tree Protection Plan PA-1732-12B Rev B dated 2 May 2014
- Site Layout Plan 1732/1L – revision L dated 12th February 2014
- Method of Working Plan 1732/4F – revision F dated 12th February 2014
- Method of Working Plan 1732/5F – revision F dated 12th February 2014
- Proposed Direct Access to Short Lane – THP Plan 2A Amendment A July 2013
- Operational Area Plan 1732/11C – revision C dated 13th February 2014
- Landscape Proposals 1732-3D – revision D dated 13th August 2013
- Restoration Plan PA-1732-6H – revision H 22nd September 2014
- Archaeology – Figure 1 Working areas plan
- Archaeology – Figure 3 Evaluation Trench Locations showing Linears dated 13th January 2012

- Proposed Drainage Ditch locations – Drawing no 120504/C/001 Rev D dated 29th May 2013
- Proposed Site Layout showing Working Areas – revision L dated 12th February 2014

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2. The development hereby permitted shall be carried out and completed in all respects strictly in accordance with the submitted documents and plans contained in the application (as listed in Condition 1 above) and no variations or omissions shall take place without the approval of the County Planning Authority.

3. From the date of this permission to the cessation of operations hereby consented, a copy of this permission including all documents with this permission, shall be displayed on the site during working hours in a position which is readily accessible to any person undertaking the development.

Time restrictions

4. The development hereby permitted shall cease on or before 30 September 2020 and all fixed plant or machinery, internal access roads, and hardstandings, subject to this permission, together with their foundations and bases, shall be removed from the site and the site shall be restored in accordance with the Restoration Plan PA-1732-6H - revision H dated 22 Sept 2014.

Limitations

5. Notwithstanding any provision to the contrary under Article 3 and Parts 4 or 19 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 or any subsequent Order, no plant, buildings or machinery whether fixed or movable, shall be erected on the application site without the prior written approval of the County Planning Authority in respect of the siting, detailed design, specifications and appearance of the installation.

Hours of operation

6. No light shall be illuminated nor shall any operation or activities authorised or required by this permission be carried out except between the following times:

0730-1800 hours Monday - Friday
0830-1300 hours Saturdays

Notwithstanding this the formation of the screen bunds around the site and their subsequent removal when required for restoration, shall only be carried out between the following times:

0800 - 1700 hours on Mondays to Friday; and

There shall be no working on Sundays or Public, Bank or National Holidays at any time.

Highways

7. Prior to commencement of development, a Scheme shall be submitted to the County Planning Authority for approval with details of the proposed access to Short Lane which shall be designed to prevent HGVs accessing the site to and from the north, constructed

and provided with visibility zones, and permanently maintained for the duration of the development to a specification to be agreed. The Scheme shall be implemented as approved and the visibility zones shall be kept permanently clear of any obstruction.

8. Upon completion of restoration of the site and by the date specified in Condition 3, the access shall be permanently closed and any kerbs, verge or footway fully reinstated by the applicant, in a manner to be agreed in writing in advance with the County Planning Authority.

9. a) The means of access to the development shall be from Short Lane only – as shown on Proposed Direct Access to Short Lane – THP Plan 2A Amendment A July 2013.

b) There shall be no means of access from the A30 London Road.

10. Before any of the operations which involve the movement of materials in bulk to or from the site are commenced, facilities shall be provided as must be agreed with the County Planning Authority, in order that the operator can make all reasonable efforts to keep the public highway clean and prevent the creation of a dangerous surface on the public highway. The agreed measures shall thereafter be retained and used whenever the said operations are carried out.

11. No development shall commence until a condition survey of Short Lane from the site access to the junction with the A30 London Road has been undertaken. This survey is to be repeated every twelve months during the operation of the site and upon completion of restoration. The applicant is to fund any repairs to the highway arising from the passage of HGVs to and from the site.

12. There shall be no more than a weekly average of 132 HGV movements to/from the site per day with no more than 150 in any one day. The site operator shall maintain accurate records of the number of HGV vehicles accessing and egressing the site daily and shall make these records available to the County Planning Authority upon request.

Air Quality

13. All HGVs accessing and egressing the site shall meet the current emissions standards of the London Low Emission Zone.

14. No activity hereby permitted shall cause dust to be emitted so as to cause nuisance or loss of amenity at sensitive receptors. Should such emissions occur, the relevant activity shall be suspended immediately until it can be resumed without causing any unacceptable emissions.

15. The measures for dust mitigation, monitoring and reporting as set out in the Dust Action Plan – issue no 03 dated 7th August 2013 hereby approved, shall be implemented for the duration of the development.

Noise

16. All plant and machinery shall operate only during the hours permitted under Condition 5 above, unless in emergency, and shall be silenced at all times in accordance with the manufacturer's recommendations.

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17. Except for temporary operations the level of noise arising from any operation, plant or machinery on the site, when measured at, or recalculated as at, a height of 1.2 metres above ground level and 3.6 metres from the facade of any residential property or other noise sensitive building facing the site shall not exceed 55 LAeq, during any 1 hour period.

18. For temporary operations such as site preparation, soil and overburden stripping, bund formation and final restoration, the level of noise arising when measured at, or recalculated as at, a height of 1.2 metres above ground level and 3.6 metres from the facade of a residential property or other noise sensitive building that faces the site shall not exceed 70LAeq, during any 1 hour period. Such activities shall not take place for a total period greater than eight weeks in any twelve month period. The level of noise arising when measured at, or recalculated as at, a height of 1.2 metres above ground level and 3.6 metres from the facade of a residential property or other noise sensitive building that faces the site shall not exceed 70LAeq.

19. All plant and company owned HGVs operating at the site shall be fitted with reversing alarms which do not emit a warning noise that could have an adverse impact on residential amenity.

Archaeology

20. No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority.

Lighting

21. No lighting shall be installed externally on site other than on the outside of the office building. Should further lighting be required, a Lighting Scheme shall be submitted to the County Planning Authority for approval, prior to any further lighting being used. The Scheme shall be implemented as approved.

Landscaping

22. All landscaping, maintenance and aftercare shall be carried out strictly in accordance with the Landscape Management Plan 2nd revision dated 19th August 2013, the Landscape Specification and Maintenance Plan 2nd revision dated 31st May 2013 (within the Addendum to Landscape and Visual Impact Assessment document) and the plan Landscape Proposals 1732-3D – revision D dated 13th August 2013.

Soil movement and storage

23. All soil movement operations shall only be carried out when the full volume of soil involved is in a dry and friable condition, i.e. the soil is in a non-plastic state such that damage to its structure shall be avoided. Conditions shall be sufficiently dry for the topsoil to be separated from the subsoil without difficulty. Soil handling and movement

shall not be carried out between the months of November to March inclusive, unless otherwise agreed in writing with the County Planning Authority.

24. Plant or vehicle movement shall be confined to clearly defined haul routes or to the overburden/infill surface and shall not cross areas of topsoil and subsoil except for the express purposes of soil stripping or replacement operations.

25. Where it is intended to use imported soils or soil forming materials as agricultural soils in the restoration process these materials shall, unless otherwise previously agreed in writing with the County Planning Authority:

a) Be separately stored in a designated area
b) Be free of objects greater than 100mm in any dimension which are likely to cause any obstruction to cultivations.

26. Throughout the period of working, restoration and aftercare, the operator shall have due regard to the need to adhere to the precautions laid out in the leaflet entitled 'Preventing the spread of Plant and Animal Diseases' published by Defra.

27. Any oil, fuel, lubricant, paint or solvent within the site shall be so stored as to prevent such material from contaminating topsoil, subsoil, soil forming material, or reaching any watercourse.

Restoration

28. The site shall be restored strictly in accordance with the details set out on submitted drawing ref: Restoration Plan PA-1732-6H – revision H 22nd September 2014

29. Material used for the backfilling of the site shall be restricted to inert waste as defined in the Landfill (England and Wales) Regulations 2002 (as amended) and shall be deposited and graded over the site to follow the final contours shown on Restoration Plan PA-1732-6H – revision H dated 22nd September 2014

Ecology

30. The removal of any trees, hedgerows or scrub should be carried out outside the bird nesting season. Where this is not feasible, vegetation should be checked by a suitably qualified ecologist immediately prior to removal.

31. No development shall take place until a survey to establish the presence, or otherwise, of badger setts has been undertaken by a suitably qualified person, and if evidence is found, a protection scheme detailing measures for their protection during the course of development, has been submitted to and approved by the County Planning Authority. The development hereby permitted shall be implemented strictly in accordance with the protection measures where approved. If no evidence of badgers is found following the survey, the applicant should notify the CPA in writing.

32. No development shall take place an Ecological Assessment has been undertaken by a suitably qualified person, to check whether the findings of the Extended Phase 1 Ecological Survey submitted as part of the Environmental Statement are still as originally described; and the Assessment has been submitted to and approved by the County Planning Authority. If any substantive changes in the ecology are found, the

Assessment shall propose any mitigation measures deemed necessary. The development hereby approved shall be implemented strictly in accordance with any mitigation measures approved as part of the Ecological Assessment.

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33. Prior to the perimeter bunds being removed from the site, a scheme shall be submitted to the County Planning Authority for approval detailing how the bunds shall be checked for the presence of reptiles, how they shall be managed to make the habitat less attractive to reptiles, and how the bunds shall be removed in a way to ensure any harm to reptiles is minimised. All works to remove the perimeter bund shall be carried out in accordance with the details approved and not until such details are approved.

Health and Safety

34. No extraction shall commence until Thames Water have agreed that it can be carried out safely without affecting their tunnel through the site, and a copy of such agreement has been sent to the County Planning Authority at least 7 days before the commencement of extraction.

35. Any work carried out within the Development Proximity Zone of the Esso Petroleum Company Ltd West London Terminal, will be in accordance with the control measures set out in the Risk Assessment dated 6 January 2014.

36. Prior to the commencement of development, the operator must contact National Grid to ensure their apparatus is not affected by any of the proposed works, due to the presence of National Grid apparatus in proximity to the application site.

37. All development shall be carried out in accordance with the latest revision of the booklet 'Special requirements for safe working' produced by Linewatch, and any covenants in the Deed of Grant shall be adhered to.

Birdstrike

38. The measures to reduce the risk of birdstrike to the lowest practicable level shall be undertaken as set out in Section 6 of the Planning Statement dated December 2012.

Groundwater

39. No development shall take place until an Operational Management Plan has been submitted to and approved by the County Planning Authority. The Operational Management Plan shall set out:

a) detailed proposals to monitor and manage the works and any contamination (including free phase hydrocarbon contamination) exposed and liberated by such works (operational management of contamination and remediation works);

b) a detailed contingency plan which addresses the measures to be taken to assess and manage previously unidentified contamination (unidentified either in nature or quantity) should any such material be discovered during the course of the works.

c) the circumstances under which an emergency response shall be initiated and the measures that shall be taken to implement that response;

d) the circumstances under which the development and implementation of a longer term remediation scheme shall be initiated and the measures that shall be taken to implement the remediation scheme.

The Operational Management Plan shall be implemented as approved.

40. No development shall take place until the applicant has submitted a detailed Scheme to install a minimum of three additional groundwater monitoring boreholes to the north and west of the site, and such additional monitoring boreholes as may be required elsewhere within or around the site, and this Scheme has been approved in writing by the County Planning Authority. The Scheme shall include:

- a plan showing the proposed location of each borehole,
- a statement confirming the rationale for locating each borehole at that particular location,
- details of the proposed methods of excavation and construction and depth of each borehole.

Upon receiving written approval from the planning authority, the applicant must, before any development takes place (unless otherwise agreed in writing by the planning authority) construct the additional monitoring boreholes in the positions agreed using the agreed methods of excavation and construction. Borehole records and a plan showing the locations of all boreholes shall be submitted to the planning authority on completion of borehole construction works. All new boreholes shall be developed by extraction of 6 well volumes of groundwater prior to first sampling and to demonstrate their functionality.

The Scheme shall be implemented strictly as approved.

41. No development shall take place until a Groundwater Monitoring Plan has been submitted to and approved by the County Planning Authority. The Plan shall set out:

a) that groundwater monitoring shall be undertaken in all existing and additional proposed monitoring boreholes;

b) the means by which baseline data (prior to gravel extraction commencing) shall be obtained;

c) the mechanisms that will allow the timely identification of a contaminant plume to be made should migration of contamination occur via movement of groundwater in any direction;

d) the means by which acceptable deviation limits are determined between monitored and predicted groundwater and surface water levels;

e) the analytical parameters to be determined, the groundwater trigger levels to be adopted and the frequency and locations of sampling events. A plan shall be provided showing the locations of all monitoring boreholes;

f) the techniques to be used to ensure the quality of the samples during pre-purging, sample recovery, sample preservation, transport and analysis;

g) the details and accreditation status of the nominated laboratory undertaking the analysis and the details of all analytical methods, limits of detection and individual method accreditations;

h) the treatment, use (in risk assessment) and quantification of tentatively identified compounds including benzene derivatives and naphthalene derivatives;

i) details of the timetable for interim reporting to the planning authority and other interested parties;

j) the rationale for the establishment and method of use and assessment of sequential Action Levels and associated interventions;

k) the requirements for routine interim and final reporting including submission to the planning authority of a final verification report. The plan shall clearly set out the minimum time period for monitoring after works have been completed and the site has been fully restored and the conditions that are required to be met for monitoring to cease.

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The Groundwater Monitoring Plan shall be strictly implemented as approved.

42. No extraction shall commence until the following has been undertaken, submitted to and approved by the County Planning Authority:

- the establishment of groundwater baseline conditions, by the collection of a minimum of 12 monitoring datasets taken at monthly intervals from all existing and proposed monitoring boreholes;
- on completion of the baseline monitoring, the revision of the Operational Management Plan, Groundwater Monitoring Plan, Human Health and Controlled Waters Risk Assessment and the Flow Model within the Groundwater Flood Risk Assessment, in light of the baseline conditions established, and including any mitigation or remediation measures required to mitigate any adverse impacts not previously envisaged;

Gravel extraction shall only take place in accordance with the versions of the Operational Management Plan, Groundwater Monitoring Plan, Human Health and Controlled Waters Risk Assessment and the Groundwater Flood Risk Assessment that have been approved following the establishment of the groundwater baseline conditions, and these shall be implemented in full.

43. If, during the course of the development at any stage, the impact on groundwater is not as predicted by the current Operational Management Plan, Groundwater Monitoring Plan, Human Health and Controlled Waters Risk Assessment or the Flow Model within the Groundwater Flood Risk Assessment, then the development shall cease until a revised assessment detailing how any adverse impact to groundwater or human health shall be dealt with has been submitted to and approved by the County Planning Authority. Any mitigation or remediation measures identified in the revised assessment shall be implemented in full.

44. On completion of the restoration of the site, groundwater monitoring shall continue in accordance with the protocols set out in the current Groundwater Monitoring Plan. A Verification Report shall accompany any application to the planning authority to discharge this condition, prepared in accordance with current Environment Agency guidance on verification of remediation of land contamination, which shall include:

- All results of sampling and monitoring;
- Details of all interventions, emergency responses (if any) and remediation works carried out (if any); and
- A risk assessment which demonstrates asymptotic levels of any identified contaminants have been achieved and that the site and any contaminants therein pose no future risk to groundwater or surface water or human health.

The Report shall clearly demonstrate to the satisfaction of the County Planning Authority that any elevated concentrations of contaminants that have arisen or been detected during the works have returned to baseline levels and been maintained at those levels for a minimum period of 12 months.

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45. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing by the planning authority) shall be carried out until the developer has submitted a remediation strategy to the planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the planning authority. The remediation strategy shall be implemented as approved.

46. No infiltration of surface water drainage into the ground at this site is permitted other than with the express written consent of the County Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

47. The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) Homers Farm dated 30th May 2013, the Surface Water Management Plan dated 25th June 2014 and the following mitigation measure detailed within the FRA:

- Limiting the surface water run-off so that it will not exceed the existing greenfield run-off rate from the undeveloped site and not increase the risk of flooding off-site, both during the operational and post-completion phase.

The mitigation measure shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the County Planning Authority.

REASONS

1-2. 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 the environment, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

3. For the avoidance of doubt and to ensure the permission is implemented by all persons employed at the site in accordance with the terms of the application.

4. In accordance with the terms of the application and enable the County Planning Authority to exercise planning control over the development and ensure it is restored in a timely manner, in accordance with the National Planning Policy Framework 2012 and Policy MC17 of the Surrey Minerals Plan 2011.

5. 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, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

6. To comply with the terms of the application and to ensure there are no unacceptable impacts on amenity, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

7 -12. In order that the development does not prejudice highway safety nor cause inconvenience to other highway users, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

13-15. To ensure the development does not have a significant adverse effect upon the environment or amenity in terms of air quality, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

16-19. To ensure that any noise from the development does not have a significant adverse effect upon amenity, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

20. To afford the County Planning Authority a reasonable opportunity to examine any remains of archaeological interest which are unearthed and decide upon a course of action required for the preservation or recording of such remains in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008 and Policy BE25 of the Spelthorne Borough Local Plan 2001.

21. In the interests of amenity, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

22. To enable the County Planning Authority to exercise planning control over the development, so that the landscaping is maintained for the duration of the development and to secure restoration to the required standard, so that the site is absorbed back into the local landscape, in accordance with the National Planning Policy Framework 2012, Policies MC14, MC17 and MC18 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

23-27. In order to safeguard soil resources and achieve a satisfactory standard of agricultural reclamation, in accordance with the National Planning Policy Framework 2012, Policies MC14 and MC17 of the Surrey Minerals Plan 2011.

28-29. In order to achieve a high standard of restoration, and protect the local environment and amenity, in accordance with the National Planning Policy Framework 2012, Policies

MC14, MC17 and MC18 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

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30-33. In order to protect local wildlife and their habitats, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

34-37. In the interests of health and safety, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

38. In order to minimise the risk of birdstrike, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

39. To ensure adequate controls are in place to monitor, assess and manage contamination during the course of the works, and to prevent pollution of the water environment in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

40. For the protection of the water environment and human health, to ensure an adequate network of monitoring boreholes is in place to establish baseline conditions at the site, to intercept any plume of contamination should migration of contamination take place via groundwater flow to the west and north-west during the course of the works, and to monitoring groundwater level and quality around and in the vicinity of the site during the works; in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

41. To ensure high quality data is obtained and used to assess the impact, if any, of the works on the groundwater environment and human health and to provide a framework to manage intervention in the form of an emergency response or longer term remediation or mitigation works should a plume of contamination be detected, or unacceptably high groundwater levels leading to waterlogging or groundwater flooding be identified, and to provide a mechanism to allow the determination of the point at which monitoring can safely be terminated, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

42-43. To ensure an adequate body of analytical data has been gathered to fully characterise baseline groundwater conditions and to ensure the Operational Management Plan, Groundwater Monitoring Plan, Human Health and Controlled Waters Risk Assessment and the Flow Model, which are used to inform any mitigation or remediation measures recommended or implemented thereunder reflect the most up to date understanding of conditions at the site and in the vicinity; in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

44. or To ensure the works have caused no long term adverse effects on groundwater quality have created unacceptable risks to human health by mobilising contamination or altering the paths of contaminant flows; in accordance with the National Planning Policy

Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

45. To protect groundwater as no intrusive investigation can fully characterise a site, and the previous investigations have identified a contaminant source directly up gradient of the proposed activity; in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

46. To protect groundwater as infiltrations SUDs/ soakaways through contaminated soils are unacceptable as contaminants can remobilise and cause groundwater pollution; in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

47. To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site, in accordance with the National Planning Policy Framework 2012, Policy MC14 of the Surrey Minerals Plan 2011 and Policy DC3 of the Surrey Waste Plan 2008.

INFORMATIVES

1. Thames Water recommend that petrol/oil interceptors should be fitted within all car parking/washing/repair facilities to avoid oil-polluted discharges entering local watercourses.

2. Details of the highway requirements necessary for inclusion in any application seeking approval of reserved matters may be obtained from the Transport Development Planning Team of Surrey County Council.

3. 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.

4. 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 Highway Service Group 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 developers 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).

5. 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).

6. The applicant is advised that as part of the detailed design of the access required by the above condition, the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other

street furniture/equipment.

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7. The proposed development will require a bespoke permit under the Environmental Permitting Regulations 2010. The proposed development is mineral extraction followed by restoration using inert waste materials on a Principal Aquifer. We will make further comments through the Environment Permit application process.

8. The applicant should be aware of the requirement within the British Standard Code of Practice for the Safe Use of Cranes, for crane operators to consult any nearby aerodromes before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4 'Cranes and other construction issues' (available at http://www.aoa.org.uk/policy-safeguarding.htm).

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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
National Planning Policy for Waste 2014

The Development Plan
Surrey Minerals Plan 2011
Surrey Waste Plan 2008
Spelthorne Borough Core Strategy and Development Plan Document 2009
Spelthorne Local Plan 2001

Other Documents
Surrey County Council Local Aggregate Assessment November 2014
