

Annex 1

Aggregates Recycling Joint DPD Cabinet 18 December 2012

Inspector's Report

Report to Surrey County Council

by Jonathan G King BA(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 26th November 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO

**THE AGGREGATES RECYCLING JOINT DEVELOPMENT PLAN DOCUMENT FOR
THE MINERALS and WASTE PLANS**

WITHIN THE SURREY MINERALS AND WASTE DEVELOPMENT FRAMEWORK

Document submitted for examination on 16th December 2011

Examination Hearings held between 20th March and 29th June 2012

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Abbreviations Used in this Report

AA	Appropriate Assessment
AM	Additional Modification (followed by reference)
AR	Aggregates Recycling
ARJDPD	Aggregates Recycling Joint Development Plan Document
CA	Civic Amenity (site)
CD	Core Document (followed by reference shown [thus])
C, D & E	Construction, Demolition & Excavation (waste)
CS	Core Strategy
DPD	Development Plan Document
ha	Hectare
HRA	Habitats Regulation Assessment
IVC	In-Vessel Composting
KDC	Key Development Criteria
KDR	Key Development Requirements
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification (followed by reference)
MPS	Minerals Planning Statement
NPPF	National Planning Policy Framework
(m)tpa	(Million) tonnes per annum
PADPD	Primary Aggregates DPD
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RS	Regional Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCC	Surrey County Council
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SEP	South East Plan
SMP(CS)	Surrey Minerals Plan (Core Strategy)
SNCI	Site of Nature Conservation Interest
SPA	Special Protection Area
SWP(CS)	Surrey Waste Plan (Core Strategy)

Non-Technical Summary

This report concludes that the Surrey Aggregates Recycling Joint Development Plan Document for the Minerals & Waste Plans provides an appropriate basis for the planning of the county over the next 14 years providing a number of modifications are made to the plan. The County Council has specifically requested that I recommend any modifications necessary to enable it to adopt the Plan. All were proposed by the authority, and I have recommended their inclusion after full consideration of the representations from other parties on these issues.

The modifications can be summarised as follows:

- The inclusion of a policy presumption in favour of sustainable development and revision of the implementation and monitoring framework to take account of this;
- The deletion of *Charlton Lane, Shepperton* from the list of sites identified under the Surrey Waste Plan Policy WD2;
- The deletion of *Stanwell Quarry, Stanwell*, from the site allocations in Policy AR1 and its inclusion in the list of existing temporary sites;
- The deletion of *Whitehall Farm, Egham, Homers Farm, Bedfont* and *Watersplash Farm, Halliford* from the site allocations in Policy AR3; and
- The updating of figures, charts and commentary relating to existing and projected aggregates recycling facilities to take account of more recent information, a more realistic assessment of site deliverability, and proposed deletions of site allocations.

Introduction

1. This report contains my assessment of the Surrey Aggregates Recycling Joint Development Plan Document for the Minerals & Waste Plans (ARJDPD or "the Plan") in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended).
2. The basis for my examination is the submitted Plan [CDSCC15] which is the same as the document as that published for consultation in August 2011.
3. During the course of the Examination, the *National Planning Policy Framework* (NPPF) [CDNat58] was published, in substitution for most of the former suite of Planning Policy Statements and Guidance (PPS, PPG & MPS). A notable exception relevant to this Plan is the retention of PPS10 *Planning for Sustainable Waste Management* [CDNat30] and its *Companion Guide* [CDNat31].
4. The timescale of the Plan on submission was 15 years, in accordance with the preferred horizon recommended in the NPPF. On adoption it will be a little shorter, but this does not affect its soundness.
5. The NPPF (para 182) states that the role of the Inspector at the Examination is to assess whether the Plan has been prepared in accordance with the Duty to Co-operate; legal and procedural requirements; and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – briefly that it is positively prepared, including being based on a strategy which seeks to meet objectively assessed development and infrastructure requirements; justified, in that it should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence; effective including being deliverable; and consistent with national policy, enabling the delivery of sustainable development in accordance with the policies of the framework.
6. The Plan has also been prepared in the context of a number of higher order adopted Plans: the Surrey Minerals Plan Core Strategy (SMPCS) [CDSCC5] and the SMP Primary Aggregates DPD (PADPD) [CDSCC6] which flows from it; and the Surrey Waste Plan (SWP) [CDSCC11], which includes the Waste Core Strategy. Principally, it seeks to put into effect the Visions and Objectives of these plans rather than having its own. So, for example, it takes forward the SMPCS objectives of reducing demand for minerals by encouraging sustainable use and recycling of minerals; and meeting the need for minerals by seeking to ensure that sufficient land is identified for recycling facilities to meet the needs of aggregates recycling. In identifying suitable sites for aggregates recycling, it relies heavily on the allocations in these plans.
7. The Government has stated that it intends to revoke Regional Strategy (RS), which in Surrey is the *South East Plan* (SEP) [CDOth12]. However, at the time of writing, it remains in place and forms part of the development plan. For so long as RS exists, the legal requirement for Plans to be in general conformity with it continues to apply.
8. In accordance with section 20(7C) of the 2004 Act the County Council (SCC) requested that I should make any modifications needed to rectify matters that make the Plan unsound and thus incapable of being adopted. My report deals

with the *Main Modifications* [CDSCC165] that are needed to make it sound and they are identified in bold in the report (**MM**) and are set out in the Appendix. 23 have been put forward. SCC has also proposed a schedule of *Additional Modifications (AM)* [CDSCC166], which are mainly minor and consequential changes, corrections and clarifications. They incorporate a number of *proposed minor amendments* previously listed in its Regulation 30(1)(e) Statement [CDSCC41]. I make no specific recommendations with respect to them.

9. The Main Modifications and the related Environmental Report Update [CDSCC167] have been subject to public consultation, the responses to which I have taken into account in writing this report.

Legal Compliance

10. A summary table relating to the compliance of the Plan and its preparation with legal requirements may be found at the end of this report.

The Duty to Co-operate

11. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A in relation to the Plan's preparation. Amongst these is the Duty to Co-operate, introduced and brought into effect shortly before the Plan was submitted by Section 110 of the Localism Act 2011. An opportunity was provided for representations to be made in relation to the Duty, and these have been taken into account.
12. This Duty is considered first because, unlike matters relating to soundness and other aspects of legal compliance, the Act does not contain any provisions to rectify a failure to comply. Consequently, if I were to find such a failure, it would be fatal to the Plan.
13. With respect to the preparation of development plans, the Duty requires the local planning authority to engage "constructively, actively and on an ongoing basis" with other local authorities and any prescribed person.
14. Although there is no dispute that the Duty applies to this Plan, the Council could not have known about its precise provisions at the time it was preparing it. In my view it would not therefore be fair to apply it in a very prescriptive way. Rather, I take the view that it would be appropriate to consider whether the Council took sufficient care to take account of the broader planning context, including the priorities of other planning authorities, so as to seek as far as possible the achievement of reasonable consistency or complementarity in approach, which is the underlying aim of the Duty. In many respects this is no different to what might be expected of any authority preparing a Plan. Of course, while ideally one would hope that co-operation and engagement would lead to a very high degree of consistency, the Duty does not require authorities to reach agreement. It is the evidence of a genuine intention to engage which is the important factor in assessing whether it has been met, not necessarily the outcome, which may in part be outside the Council's hands, but which may nonetheless be assessed under the tests of soundness.
15. Within Surrey, the Surrey Planning Officers Association, comprising the heads of planning of SCC and the districts and boroughs meet at 6 to 8 week

intervals, affording the opportunity for liaison on matters including waste management. Similarly, the Surrey Planning Working Group operates for planning policy officers on a bi-monthly basis. I am told it is regularly apprised of waste and aggregates matters, which may be discussed. Where responses to the draft Plan had been received from constituent authorities, specific meetings were arranged or liaison effected through Local Committees to discuss matters [CDSCC84]. Few representations from other local authorities were received to the submitted Plan, with none suggesting a lack of co-operation.

16. Looking to the wider area, SCC has established contacts with other minerals and waste authorities in the Region, particularly through the *South-East Waste Planning Advisory Group*, essentially formed out of what was previously the *South-East Regional Technical Advisory Board*, and the *South East England Aggregates Working Party* which was formed out of the previous *South East England Regional Aggregates Working Party*. These fora each meet roughly 2 or 3 times a year to discuss matters of mutual interest. In August 2011, an inter-authority meeting was held with the Greater London Authority, London boroughs and Waste Planning Authorities from the East of England to discuss issues arising from the London Plan waste policies.
17. Aggregates recycling (AR) involves the processing of Construction, Demolition and Excavation (C, D & E) waste. Owing to its weight and low value, this is uneconomic to transport long distances, with 20 miles being estimated by the Council as the usual maximum [CDNat48]. Nonetheless, Surrey adjoins areas which have the potential to export such wastes into the county. The main urban areas of Kent, East and West Sussex are remote from Surrey; and those of East Grinstead, Sevenoaks and Tunbridge Wells are modest in extent and unlikely to generate large amounts of C, D & E waste or create much demand for recycled product. SCC estimates that Crawley and Horsham are likely to generate flows of waste, but existing AR facilities are well placed to cater for it. Most of the urban area of Hampshire is remote from Surrey, though it is understood that there are some cross-border flows of waste in both directions. Again there are conveniently situated existing facilities [CDSCC59, CDSCC60]. Overall, having considered the geographical relationship of Surrey to Kent, East and West Sussex, Hampshire, Bracknell Forest, Windsor & Maidenhead, and Slough, SCC has concluded that it is unlikely that there would be a need for additional strategic AR facilities to serve those authorities or for Surrey waste to give rise to facilities elsewhere.
18. I am not aware of any particular engagement with these authorities for the purposes of informing the preparation of the Plan beyond the regular inter-authority meetings. But I do not believe that the circumstances required it. This is borne out by the fact that no representations to the Plan have been made from any of those authorities. I have no reason to believe that engagement with them through the present liaison arrangements has been anything other than positive.
19. Surrey also adjoins some London boroughs which generate considerable quantities of waste, a proportion of which is taken into Surrey for recycling or disposal. Some 75% of this material is estimated to be landfilled, mostly to enable restoration of mineral workings. There are no reliable figures available on the subject, but the Council has estimated that perhaps as much as 90,000

tonnes per annum might be processed in Surrey to produce recycled aggregates. So far as London Waste policy is concerned, the *London Plan* [CDOth15] sets a target to exceed 95% re-use and recycling by 2020. *The South London Waste Plan* [CDOth13] does not include an estimate for C, D & E waste, but states that the majority is expected to be recycled on-site. The *Proposed Sites and Policies* consultation document of the *West London Waste Plan* [CDOth14] also requires that such wastes are re-used and recycled where practicable. There is consequently no perceived need to allocate any sites for AR purposes.

20. I have some sympathy with SCC's view that, though entirely laudable, the expectations of the waste policies for London may well be over-optimistic; and that the county can expect waste to continue to flow across the border. It has sought to challenge the very high recycling rates at the London Plan Examination and by communication with neighbouring London Boroughs, but it has not been successful in influencing policy. However, the lack of success in that regard does not detract from SCC's attempt to engage with other authorities on the topic of cross-border flows. No representations from the London Boroughs have been made to the Plan.
21. Some representations were made with respect to the Duty by reference to NPPF [CDNat58], which amongst other things says that early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. While not seeking to minimise the importance of this policy, it should be noted that such engagement is not within the ambit of the statutory Duty.
22. Having regard to the inter-authority forums, the consultation arrangements and other involvement with authorities whose policies may have a bearing on the Plan, I conclude that the County Council has fulfilled its Duty to co-operate with regard to its preparation.

Issue 1

Does the Plan meet the other statutory and procedural requirements?

23. SCC has prepared a self-assessment of legal compliance [CDSCC51].

Statement of Community Involvement

24. SCC adopted its Statement of Community Involvement (SCI) [CDSCC1] in July 2006. A Consultation Statement for the Plan has been published under Regulation 30(1)(d) [CDSCC40] which sets out the steps taken at each stage of its production; and another under Regulation 30(1)(e) [CDSCC41] at the time of submission, summarising the main issues raised in representations. There are none which suggest any serious failure to consult. There are a few representations which suggest that some people had difficulty with the electronic consultation forms but overall I am satisfied that the Plan has been prepared in compliance with the SCI, including meeting the minimum consultation requirement set out in the Regulations. All statutory consultees, stakeholders and the public generally have been provided with an appropriate opportunity to contribute to the preparation of the document. Additional public consultation has also taken place with respect to the post-submission proposed main modifications, additional modifications, the Environmental Report update and the publication of the NPPF.

Community Strategies

25. The Plan refers to the Vision of the Surrey Sustainable Community Strategy, which is expressed in all-embracing terms. To the extent that the Plan seeks to resolve the particular challenges associated with aggregates recycling and preserving and developing quality of life, it is consistent with it. Aggregates recycling is an inherently sustainable activity, but not without environmental consequences, for example with respect to traffic, noise and dust, which are considered by reference to individual sites identified in the Plan. All of the District Councils had the opportunity to comment on the Plan, but in their representations none raised any matter relating to a lack of conformity with their Sustainable Community Strategies. I conclude that in general terms the Plan harmonises with the priorities of those Strategies.

Sustainability Appraisal

26. The Plan has been subjected to Strategic Environmental Assessment and Sustainability Appraisal; and this is documented in the Environmental Report (ER) [CDSCC23 & CDSCC25] and in the update [CDSCC167]. During the course of the Examination I expressed some concern about the robustness of some of the assessments / appraisals on individual sites, and I take the view that the length and complexity of the ER is disproportionate to its value. Nonetheless, I accept that it provided a strategic input into the preparation of the Plan and addressed the key sustainability issues and challenges in the Plan area. The legal requirements with respect to its preparation were fulfilled.

Appropriate Assessment

27. An Appropriate Assessment (AA) and an update has been undertaken of the implications of the policies and proposals of the Plan in view of the conservation objectives for the features of qualifying interest on the Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites, [including *East Hampshire Hangers SAC; Mole Gap to Reigate Escarpment SAC; Shoreheath Common SAC; South West London Waterbodies SPA & Ramsar site; Thames Basin Heaths SPA; Thursley, Ash, Pirbright & Chobham SAC; Thursley, Hankley & Frensham Commons (Wealden Heaths Phase I) SPA; Thursley & Ockley Bog Ramsar Site; Wealden Heaths Phase II SPA; and Windsor Forest & Great Park SAC*]. The AA meets the requirements of Articles 6(3) and (4) of the Habitats Directive and this is documented in the report on the Habitats Regulations Assessment for the Plan [CDSCC26 & 167]. It concludes that its implementation would not give rise to significant effects on the integrity of the relevant interests. Nonetheless, all planning applications will be screened to determine whether they have the potential to give rise to adverse effects on the features of importance, and where necessary will be subject to full AA prior to the grant of planning permission. The conclusions are in accordance with the advice and recommendations of Natural England.

National Policy and Regional Strategy

28. I consider the consistency of the Plan with particular aspects of National Policy and Regional Strategy within my assessment of soundness below. Overall, I conclude that the Plan is consistent with the former and in general conformity with the latter.

29. The NPPF states unequivocally that the purpose of the planning system is to contribute to the achievement of sustainable development. Its policies as a whole constitute the Government's view of what sustainable development in England means for the planning system. Notwithstanding this clear statement, the view is taken that this should be made plain in development plans. To a large extent, this has already been included within the Waste and Minerals Core Strategies which set the scene for the Aggregates Recycling Plan. The former has as part of its Vision "*to provide for sustainable management of Surrey's waste*"; while the latter encourages "*reducing demand for primary minerals by encouraging efficient use of resources and recycled materials, where appropriate, in preference to excavating new resources*". Even so, in order to ensure consistency with national policy, SCC is proposing as a main modification [MM1], a new policy [numbered AR1, requiring the renumbering of the later policies] which includes an explicit presumption in favour of sustainable development. Consequential revisions to the implementation and monitoring framework sections of the Plan are also proposed in order to maintain soundness [MM20, MM21].
30. At my request SCC has produced a supplementary self-assessment relating to consistency of the plan with the NPPF [CDSCC150]. Several representations in response to the public consultation allege a lack of consistency, notably with respect to the Green Belt and flood risk in the context of climate change, with specific reference to the *Milton Farm, Egham* allocation. These matters are addressed in that part of the report dealing with that site.

Assessment of Soundness

Main Issues

31. Taking account of all the representations, written evidence and the discussions that took place at the Examination Hearings, I have identified 4 main issues upon which the soundness of the Plan depends.

Issue 2

Is the Plan consistent with the broader planning context?

32. The starting point for the amount of aggregate recycling capacity required is set by the SMPCS [CDSCC5] which in Policy MC5 seeks to increase the rate of recycling to at least 0.8 million tpa by 2016 and to 0.9 million tpa by the end of the Plan period (2026). The first of these figures derives from the apportionment for Surrey in the SEP [CD0th12], while the latter assumes a similar rate of increase and takes account of the National and Regional Guidelines for aggregates provision in England 2005-2020 [CDNat56]. Subject to what I say below with respect to deliverability, in seeking to achieve these quantities, the Plan is consistent with this broader planning context.
33. The proposed level of provision takes into account inter-authority flows of waste. Some representations are concerned with providing facilities which may handle waste from outside Surrey. But although PPS10 looks to communities to take more responsibility for their own waste, it is unrealistic to expect there to be no cross-boundary movements. Such movements may be in both directions, and may often represent the most sustainable solution, for example where a facility close to a boundary is nearest to the source of the waste. The Minerals Site Restoration Supplementary Planning Document

[CDSCC7] shows that there is at present insufficient C, D & E waste available in Surrey to ensure restoration of mineral voids to former levels. The recycling of such waste, even if imported, has the potential to contribute to the desirable objective of dealing with waste in the most sustainable way, providing a recycled aggregate, thus reducing the need to extract natural mineral, and helping to restore mineral voids. There is no reason to seek to reduce the provision of recycling facilities by reference to imported waste.

34. I recognise that in recent years the national economy has suffered a severe and prolonged downturn and that recovery is slow. This is reflected in a reduction in development activity which it is reasonable to suppose may in turn limit demand for aggregate and the quantities of material available for recycling as aggregate. It may be that there is presently a lesser need for aggregate recycling facilities than was predicted at the time these figures were estimated. However, the Plan covers the period up to 2026, during which time it is not unreasonable to expect the economy to make a recovery and for there to be a resurgence in development activity, not least in the south-east of England. In the interests of sustainability it is important that the Plan should not underestimate the need for aggregates recycling facilities
35. Consequently, and in the absence of any credible alternatives, I do not believe it would be appropriate to revisit these figures. They are the best available and have been incorporated into a recently adopted Plan. They may be considered sound.
36. I consider consistency of the site allocations with national policy in PPS10 and in relation to the Green Belt under my next issue.

Issue 3 - Does the Plan set out a strategy for sustainable development to enable sufficient opportunities for the provision of aggregates recycling facilities in appropriate locations and at appropriate times?

The geographical distribution of sites

37. Policy MC1 of the SMPCS gives priority for locating AR development in urban areas, particularly in north-west Surrey, Guildford, Woking and Reigate/Redhill. Where urban land is not available, consideration should be given to suitably-located previously-developed land close to urban areas and to temporary use of mineral sites to be restored with inert fill. However, it expressly acknowledges that there is limited availability of suitable locations for this type of development within the urban areas and competition from other land uses, stating that it is necessary to seek to identify suitably located sites that lie outside the urban area.
38. Amongst other things, the objectives of the SWPCS are to enable waste to be disposed of in one of the nearest appropriate installations without endangering health or harming the environment; and to protect the Green Belt while recognising the particular locational needs of some waste management facilities. But it does not seek to achieve a particular geographical distribution of facilities. Rather it identifies land where it can, pragmatically acknowledging that there is a shortage of suitable sites. It also explicitly recognises that it is neither practicable nor affordable for each local community to treat its own waste.

39. In line with PPS10 [CDNat30] and the SMPCS, SWPCS Policy CW5 sets out a sequential approach to site identification, giving priority to industrial and employment sites particularly in urban areas; to other suitable urban sites; to sites close to urban areas and to those easily accessible by the strategic road network. Priority is given over greenfield land to previously-developed land, and to contaminated, derelict or disturbed land, redundant agricultural buildings and their curtilages, mineral workings and land in waste management uses. A very similar approach has been adopted in the identification and assessment of sites for inclusion in the present Plan. In practice, however, it has been found that there are few opportunities in urban areas.
40. The Plan divides Surrey into 5 geographical "sectors":
1. North-West, which includes Staines, Chertsey, Walton-on-Thames, Esher and Cobham;
 2. North-East, including Epsom, Banstead, Leatherhead and Caterham;
 3. South East , including Dorking, Reigate, Redhill, Oxted and Horley;
 4. South West, including Godalming, Cranleigh and Haslemere; and
 5. West, including Camberley, Woking, Farnham, Guildford, and the eastern parts of Farnborough and Aldershot.
41. However, these sectors have no particular planning or strategic function and add little of value to the Plan. They are principally descriptive and serve only to highlight the concentration of sites, a matter of some concern to a number of representors. Of the 16 sites allocated or identified in the submitted Plan, all but 3 are in sector 1. There are 2 in sector 3; 1 in sector 5 and none in sectors 2 and 4.
42. It is acknowledged that this promotes somewhat of an over-concentration of sites in the north-west part of the county. However, the distribution does coincide broadly with the greatest concentration of population and proximity to the London conurbation and broadly reflects the geographical priorities set out in SMPCS Policy MC1 and the allocations of the higher-level plans.
43. As indicated in the next section, the Plan as proposed to be modified includes 5 fewer sites, albeit that 1 has simply been recognised as "existing". All are within the north-west sector of the county. Although not primarily prompted by a wish to correct any perceived imbalance between the sectors, that has partially been the outcome of their deletion.
44. It is fair to say that the proposed distribution of sites has been driven to a large extent by availability rather than the achievement of any strategic spatial distribution. It is particularly telling that although 29 potential urban sites and industrial estates were identified in the SWP as possibly suitable for accommodating waste management facilities - additional to the allocated sites - not one has been taken forward in the AR Plan. And not one of these was put forward for consideration by a potential operator in representations. One may reasonably conclude that they were not practically available or suitable. Indeed, only 2 other sites have been put forward by representors for

consideration additional to those allocated in the Plan: *Homefield Sandpit, Runfold and Lambs Brickworks, Godstone* with the first of these already identified as an existing temporary site. Moreover, of those allocated, several were shown during the Examination to be practically unavailable. This demonstrates conclusively how difficult SCC's task has been in seeking to promote a more ideal distribution of sites.

Green Belt

45. A very large proportion of Surrey is designated as Green Belt, representing a significant constraint to development. All but 2 of the allocated or identified sites in the Plan are in the Green Belt, giving rise to a significant number of specific and general representations.
46. Waste development, including AR, is classed as inappropriate development in the Green Belt. However, in recognition of the need for waste facilities, Policy W17 of the SEP says that waste management facilities should not be precluded from it. The SWPCS goes on to acknowledge that it is likely to be necessary to locate some facilities in the Green Belt in Surrey, provided that very special circumstances can be demonstrated and the other provisions of SWP Policy CW6 (which broadly applies national policy for development in the Green Belt) is complied with. Amongst other things, that policy identifies the lack of suitable non-Green-Belt sites; the characteristics of the site; and the wider environmental and economic benefits of sustainable waste management as considerations which may contribute to a finding of very special circumstances.
47. Policy M2 of the SEP states that where temporary recycling facilities are to be proposed in the Green Belt, they should be sited at existing minerals or waste sites wherever possible. This is taken forward by SWP Policy WD3, which gives in-principle support for recycling, storage and transfer of construction and demolition waste at mineral sites for a temporary period commensurate with its operational life and also subject to Policy CW6. Mineral extraction is a temporary activity and is not classed as inappropriate development in the Green Belt provided it preserves openness and does not conflict with the purposes of the inclusion of the land within it. There is potential for synergy between mineral working and aggregates recycling which may provide the basis for concluding that very special circumstances exist to justify granting permission for the latter in the Green Belt. Nonetheless, each proposal will still explicitly have to pass the tests of SWP Policies CW6 and WD3.
48. The submitted Plan is in line with these higher-order policies. Of the 14 Green Belt sites, 6 are allocated minerals sites in the PADPD and 6 are allocated for waste use in the SWP, where the Green Belt location has already been taken into account in general terms. It is not the purpose of this Examination to review the suitability of those allocations unless significant new evidence is submitted. Of the other Green Belt sites, 1 is a quarry and the other has been used for depositing river dredgings, an existing waste use. The remaining sites are a disused quarry and a safeguarded rail aggregate depot.
49. In conclusion, I am satisfied that SCC has, through its appraisal of sites sought to apply the locational principles of PPS10 and the higher level plans so far as it has been able. The fact that it has not been particularly successful in

identifying urban sites and sites outside the Green Belt is unfortunate, but largely unavoidable owing to the lack of availability of alternatives. Subject to what I say about individual sites, I find this aspect of the Plan sound.

Issue 4

Does the Plan make appropriate quantitative provision for the recycling of material as aggregate and will that provision be made at the right time?

50. This issue principally addresses the ability of the Plan to bring forward sufficient sites to meet the requirements set out under Issue 2, starting with an examination of existing provision and moving on to consider the sites identified or allocated in the Plan.

Present recycling provision

51. Present provision comprises in-situ recycling, together with permanent and temporary facilities.
52. It is a matter of some concern to me that, despite the Council having sought information from the operators, the evidence for the actual capacity of many of the facilities is either missing or unreliable. The problem is compounded by the limitations placed on it by the need to maintain commercial confidentiality with respect to some information. The resulting lack of reliable data is disappointing, because it is against this background that assessments of the need for future recycling provision must be made. During the course of the Examination, the figures in the Plan have been reviewed and revised (see para 59). Though I maintain my reservations about their reliability, I am reasonably satisfied that they are the best estimates that can be arrived at. No compelling arguments for using significantly different figures have been suggested to me.

In situ recycling

53. A substantial quantity (estimated as 19.8% nationally) of C, D & E waste is recycled or re-used on construction and / or demolition sites where it arises. The Plan assumes a similar proportion for Surrey, amounting to 46,096 tpa in 2010, a figure which the Plan assumes will increase by 10% over the Plan period – to 47,781 tpa in 2016 and 50,726 tpa in 2026. The evidence to support this is not substantial and SCC acknowledges that confidence in it is not high owing to the lack of reliable information or of a mechanism for SCC to monitor it. Nonetheless it is reasonable to believe that the county's performance will not be significantly different to elsewhere. While in-situ recycling will never be suitable for the majority of aggregate-forming wastes, it is a sustainable option, involving less transportation, and the proportion of waste processed in this way may be expected to rise. An increase of 10% is not critical to the overall assessment of need. I am therefore prepared to accept it, though it is a variable that I would urge SCC to keep under consideration with a view to amending it should any new monitoring information become available.

Existing permanent facilities

54. Table 1 of the Plan identifies 13 existing permanent facilities. Of these, 3: *Oak Leaf Farm, Stanwell, Reigate Road MRF, Betchworth and Weylands Treatment*

Works, Hersham, are specifically allocated for recycling, storage, transfer, materials recovery and processing facilities (excluding thermal treatment) in Policy WD2 of the SWP.

55. The Plan assumes that all of these sites will continue to operate for the foreseeable future. The operators have not stated otherwise and I have no reason to take a different view. In 2010, the Aggregates Monitoring Survey showed that they produced some 232,808 tpa of recycled aggregate. Taking into account planned increases in recycling capacity at 2 of the sites, together with an assumed general increase in output of 10% over the Plan period, this is projected to rise to 287,748 tpa by 2016 and to 306,247 tpa by 2026.
56. As with the in-situ production, there is little evidence to support the assumed 10% increase. Nonetheless, it may reasonably be supposed that the demand for recycled aggregates will rise over the Plan period in response to European [CDEur10], national [CDNat53] and local policy pressure to reduce reliance on primary aggregates in the interests of sustainability. In Surrey, demand will also be driven by the quantity of workable primary aggregates diminishing towards the end of the Plan period, increasing the requirement for alternatives. The figure of 10% is fairly small. I am prepared to accept it, given the difficulty of making such predictions over a lengthy Plan period at a time of significant economic change and the generally poor quality of information available. It has not been challenged by the operators. But again, I urge SCC to monitor the situation in order to inform future plans.

Existing temporary facilities

57. 7 temporary sites are identified in Table 2. To these, SCC proposes to add *Stanwell Quarry*, presently included under Policy AR2 as a proposed site, but which has in the meantime been granted planning permission for 5 years from late 2011 [**MM9, MM22, MM23**]. Of the others, *Farnham Quarry*, *Runfold Farm* is undergoing restoration and is near completion. *Hithermoor Quarry* is due to commence in 2012/13 for a period of 11 years. *Homefield Sandpit*, *Runfold* has permission to the end of 2020, but has been put forward by its operators for specific allocation under Policy AR1. *Merrow Highway Depot* (the production from which was the subject of dispute at the Hearings, but is acknowledged to be small) is to finish in early 2014. The permission on *Land to the West of Queen Mary Reservoir*, *Laleham* has not yet been implemented, but expires after the end of the Plan period (2033). The permission at *Runfold South Quarry* has been extended to 2017, while that at *Shepperton Quarry* finishes in early 2014. These periods are added for clarity in a proposed additional modification [**AM12**].
58. With these sites variously commencing and ceasing production at different times during the Plan period, the overall estimated effect is for output to rise rapidly from a modest 148,450 tpa to around 550,000 tpa before falling back to 449,443 tpa by 2016 and to 187,500 tpa by 2026.

Present provision overall

59. During the course of the Examination, SCC revised the figures included in the Plan to take account of more up-to date information – notably the 2010-2011 Annual Monitoring Report [CDSCC62]. These revisions to figures and the

projection charts are put forward as main modifications [**MM2, MM3, MM4, MM5, MM6, MM7**].

60. The summary table (A) below shows that the predicted output from these 3 sources is capable of amounting to nearly 785,000 tonnes in 2016: a shortfall of only about 15,000 tonnes compared to the figures given in the SEP and the SMPCS. I consider that to be negligible in context. However, as the temporary sites progressively cease operation over time, a significant shortfall is predicted to arise: output of some 544,000 tonnes in 2026 would be about 356,000 tonnes less than what is required for that year.

Table A

Source	2010	2016	2026
In situ	46,096	47,781	50,726
Existing Temporary sites	148,450	449,443	187,500
Existing Permanent sites	232,808	287,748	306,247
Totals	427,354	784,972	544,473
Targets		800,000	900,000
Predicted shortfall	-	15,028	355,527

All quantities in tonnes per annum

61. It is against this background that sites have been identified (where they are already allocated for waste use in the SWP) or allocated in the Plan.

Individual site identifications and allocations

62. The plan identifies new sites under 3 main headings: SWP Policy WD2 (or ARJDPD paragraph 50) sites, being sites already formally allocated in principle for waste development in the SWP; Policy AR1 sites, being new sites identified in this plan; and Policy AR3 sites, which are sites allocated in the PADPD for primary aggregate production.
63. The identification of sites goes back to the preparation for the Review of the SWP. Site assessments, detailed consideration of sites and additional /review sites for waste management generally were undertaken between September 2004 and February 2006, with reports on site options and further site options in August 2005 and June 2006 [CDSC32]. A Long List assessing the suitability of sites for AR was published in November 2009 [CDSC30] and a Short List [CDSC31] in August 2011. Background reports were also produced in August 2011 in relation to landscape and visual impact [CDSC34]; transportation [CDSC39] and strategic transportation [CDSC38]; noise [CDSC35]; and dust [CDSC33]. The last was general in scope, but the others all included some element of site-specific assessment.
64. The landscape and visual assessment considered only 3 of the 4 sites allocated under Policy AR1 (omitting *Stanwell Quarry*, which has been granted planning permission for a temporary AR facility), together with *Hamm Court Farm*, *Weybridge*, one of the Policy AR3 sites. Those that were not assessed, including all sites allocated under SWP Policy WD2 and the remaining Policy

AR3 sites were already allocated in adopted plans either for waste-related development or for mineral extraction. The transportation assessment is described as "broad-brush". It addresses all of the AR1 and SWP Policy WD2 sites, together with just one of the AR3 sites: *Addlestone Quarry*. The strategic transportation assessment concludes as to the likely impact of all the site allocations on the strategic road network. The noise assessment is brief, but addresses all of the sites in the Plan.

65. The partial nature of some of these assessments is unexplained. However, the Environmental Report [CDSCC23] assesses all of the sites by reference to 15 variables, including a number which are the subject of numerous representations. Habitats Regulations and Strategic Flood Risk Assessments (HRA & SFRA) [CDSCC26 & 53] have also been prepared.
66. The process of site identification has been the subject of some criticism and I have expressed some concern myself during the Hearings. I am of course aware of the observations made in the *Capel* judgment (*Capel Parish Council vs Surrey County Council [2009] EWHC 350 (Admin)*) with respect to the degree of rigour that may be expected of authorities in presenting supporting evidence at local plan Examinations. However, I have also taken note of what the NPPF says in substitution for the former policy in PPS12. It states that in addition to a number of statutory assessments (such as HRA and SFRA) which are required to be prepared, the evidence base should be adequate, up-to-date and relevant, but also proportionate (my emphases).
67. Overall, I am reasonably satisfied that the evidence presented meets these requirements. Although some shortcomings in the information were identified during the Examination, these were largely made up for in additional evidence submitted at my request. The precise decision-making processes were not always as clear as they could have been: for example the assessments in the Short and Long Lists do not always appear consistent. But I can conclude that the evidence presented at the Examination broadly supports the Plan as proposed to be modified.
68. A recurring theme throughout the Examination has been doubt over the deliverability of the identified and allocated sites, due mainly to the inability of SCC to obtain clear statements of operator interest in relation to many of the sites. But uncertainty over deliverability – and hence the effectiveness, and ultimately the soundness of the Plan – is recognised and addressed in the approach adopted by SCC. The submitted Plan freely acknowledges that some of the sites may not be developed; and adopts a series of scenarios for planning purposes: that 25%, 50% or 75% of the capacity may be delivered. It is a crude approach but it does provide a rough indication of the likelihood of the targets being met and includes an element of flexibility.
69. It is a matter of some concern to me that a number of the owners or operators of the sites chose not to engage with the plan preparation process – not even to support the allocation of their own sites at the Examination. Moreover, and of at least as great concern is the fact although SCC have attempted to liaise with these owners and operators, the information available about the likelihood of the sites coming forward for development for AR is partial and often uncertain [CDSCC106]. As a result, for some sites I am in the position of having little evidence upon which to base my conclusions about deliverability.

70. Following considerable discussion at the Examination Hearings and recognising the implications for the soundness of the Plan, SCC has sought to amend its approach by means of Main Modifications to the text of the Plan and a new Chart 8, showing projections of production [**MM17, MM18, MM19**]. The revised approach is to identify those sites where the operators have indicated a firm intention to bring forward proposals, referred to as "*operator interest*" or "*anticipated operator*" sites and the remainder, in which there must be less confidence [SCCCD106]. There are just 3 that fall into the first category: *Salfords Depot, Redhill* and *Penton Hook Marina, Chertsey* (respectively a permanent site and a temporary site allocated under Policy AR1); and *Milton Park Farm, Egham* (a minerals site identified under Policy AR3. I consider these first.

"Operator interest sites"

Salfords Depot, Redhill

71. This site is the only permanent allocation in the Plan that cannot be traced back to allocations in the SWP or the SMP, though it is already safeguarded as a rail aggregate depot under Policy MC16 of the latter. Hitherto its throughput and future potential has been limited by significant land ownership and road access constraints. However, both have now been resolved: the operator having acquired land which will enable access to be gained through the adjoining industrial estate / business park. This should enable the present access from Southern Avenue, a residential road which is unsuitable for heavy traffic, to be closed for HGV use in line with the Key Development Criteria (KDC) listed in the Plan. SCC proposes main modifications to reflect this change of circumstances [**MM11, MM13**].
72. Salfords Depot adjoins a railway line with existing sidings, which would be leased to the operators. The site would utilise 3 types of flow: rail in and out, rail in and road out, and road in and out, though it is anticipated that some 90% would be rail based. The use of rail is inherently more sustainable than road. The Plan indicates a maximum output of 50,000 tpa from the site, but the operators are confident that it would cater for double that figure. This is reflected in proposed main modifications to the supporting text [**MM10, MM12, MM14**] and in a revised chart showing anticipated production from Policy AR1 sites [**MM15**].
73. The operators have indicated an intention to submit a planning application shortly. While the site provides an opportunity for industrial development to be built in its northern part, which would also provide a buffer between the AR facility and the housing, this is not essential to make the AR operation viable. I am satisfied that the site is deliverable and that it would make an important long-term contribution to secondary aggregate production in Surrey.
74. Subject to the modifications being made to reflect the up-to date position and the KDC being addressed satisfactorily, I conclude that the allocation is sound.

Penton Hook Marina, Chertsey

75. This site has been allocated in order to process some 300,000 tonnes of river dredgings presently deposited over a 1.6 ha area lying between the A320 Chertsey Lane and the marina. The intention is to restore the site as part of a

wider scheme, in line with Runnymede Local Plan Policy NE7, which requires it to be restored to a low-key recreational use.

76. No newly-arising waste is intended to be recycled other than a small amount of additional river dredgings imported by barge (the latter point clarified by an additional modification [**AM15**]). The quantity that would be imported is not defined, but would be limited by the intended short lifespan of the operations, understood to be just 2 years. Consequently, I do not believe that the scale of importation envisaged would result in any significant delay in the restoration of the site.
77. There would be no importation of waste by road, though the processed material would leave the site by that means, directly on to the A320. The KDC highlight the potential for this to affect occupiers of residential properties directly opposite the entrance and say that it may be necessary to restrict HGV movements. This is sensible.
78. The part of the site where the processing plant would be situated is in an area of flood risk, and the KDC say that a FRA would be required to accompany any planning application. However, I understand that the Environment Agency is content with the allocation in principle.
79. As it is anticipated that the project will be complete before 2016, it cannot be taken into account with respect to meeting the target provision for that year or for 2026. Nonetheless, the proposed facility would be sustainable in that it would make good use of an otherwise wasted resource by making a contribution to recycled aggregate production for a short period. Although categorised as inappropriate development for Green Belt purposes, it would permit the site to be restored to a use compatible with its Green Belt location. I am reasonably satisfied that the harm by reason of inappropriateness, and any other harm, is likely to be outweighed by these other considerations.
80. Subject to the KDC being addressed satisfactorily, I conclude that the allocation is sound.

Milton Park Farm, Egham

81. This site is allocated as a preferred area for concreting aggregate under Policy MA2 of the PADPD. It extends to some 57 ha, lying to the south of Egham and west of the M25. Its north-western boundary is marked by Whitehall Lane, while to the east is Milton Park, Milton Park Farm and Stroude Road. Immediately to the south west is a separate minerals allocation, also identified for aggregates recycling in the Plan: *Whitehall Farm*. However, as this is ultimately intended to form a continuation of the Milton Park Farm extraction, and there would be no distinct AR facility, SCC propose to remove it from the allocations under Policy AR3 [**MM16**].
82. A planning application for the mineral extraction and processing and for restoration by the importation of inert materials has been under prolonged consideration. At the time of writing it has not been determined. I have been urged by several representors to conclude that there must be a significant chance that the site will not in fact be developed. I think that unlikely. The site is identified in the adopted PADPD as a preferred area for extraction and although there are some outstanding issues, principally concerned with

hydrology, that remain to be resolved, I have no firm reason to believe they are incapable of resolution. That is the view of SCC.

83. In the event that permission is granted, there is support in principle for AR at the site by virtue of Policy WD3 of the SWP and Policy MC1 of the SMPCS. The supporting text of the former identifies the advantages of co-locating C, D & E waste recycling on mineral sites. Both materials are similar in nature, as are the processes that they undergo, including screening and grading, crushing and breaking. The potential environmental effects, including dust generation, noise and haulage / transport are also broadly similar. But potentially there are transport-related savings to be made through the use of heavy vehicles delivering waste and backhauling with product.
84. Not specifically identified in the SWP, but equally relevant, is the link between AR and the restoration of mineral voids by infilling. In the case of Milton Park Farm, the intention would be to restore the workings using inert wastes, which would comprise unrecycled C, D & E wastes or the residual fraction left after recycling. However, there is nothing in the Inspector's report for the PADPD [CD0th18] which suggests that the acceptability of the mineral working is dependent upon AR taking place. It is unclear to me whether an AR facility would decrease or increase the speed of restoration. On the one hand, the recycling could divert suitable materials away from restoration; but, on the other, the presence of the AR facility could attract additional material to be brought to the site. However, in either case, the presence of the facility would represent a sustainable approach to inert waste management, in that it would contribute to the supply of recycled aggregate and reduce the amount of waste landfilled, while ensuring the restoration of a minerals site.
85. I have already addressed generally issues relating to the concentration of sites in the north-west of the county and the Green Belt. The question as to whether very special circumstances exist sufficient to outweigh the Green Belt presumption against inappropriate development is a matter to be considered in the context of detailed proposals in a planning application, which in turn would have to take into account the detail of the mineral working. However, having regard to SWP Policy CW6, I consider that the lack of suitable non-Green-Belt sites, and the wider environmental and economic benefits of sustainable waste management are weighty considerations which are capable of contributing to the balance.
86. This is by far the most contentious site of any identified in the Plan. But it was apparent to me during the course of the Examination that although the opposition from local residents is substantial and heartfelt, much relates to the principle of mineral workings rather than to the additional impact of AR. It is not the purpose of the present Examination to re-consider the issues raised in relation to mineral extraction. My task is solely to consider whether the site is suitable for AR. That said, I recognise the potential for cumulative impacts.
87. The Inspector who examined the PADPD concluded that the site, together with *Whitehall Farm* would make a significant contribution to meeting the provision for concreting aggregate set out in the plan. She concluded that any possible concerns about traffic, unneighbourly impact, harm to the environment or hydrology are capable of being satisfactorily addressed through good site design, appropriate mitigation and the use of planning conditions and

obligations. She found the site both justified, effective and sound. These conclusions were reached in the context of the Key Development Requirements (KDR) for the site identified in the PADPD: access; local amenity; biodiversity; heritage; hydrology; infrastructure; landscape; air quality; aerodrome safeguarding and restoration.

88. Of these, I consider that AR processing has the potential to raise additional issues in relation to the potential for increased traffic; air quality (including dust); and local amenity (including noise and impact on Manorcroft School).
89. With respect to the remainder, the AR facility would take up only a small proportion of the overall site, in close proximity to the minerals processing plant, on land which otherwise would be affected by the extraction. I do not believe there would be any significant effect on biodiversity. The plant and stockpiles would increase the amount of above-ground evidence of activity on the site and would be visible from certain viewpoints. But they would be seen in the context of and appear very similar to the primary minerals processing activities. They would not, to my mind, affect the landscape to a substantial extent.
90. With respect to heritage matters, I fully acknowledge the concerns expressed on behalf of the Great Fosters Hotel, a fine Listed Building. But although this is located close to the eastern boundary of the allocated minerals site, it is well away from where the processing and AR would take place. I do not believe there would be any additional visual or other impact that would detract from the sensitive use of the building.
91. I am aware that aspects of hydrology, both dewatering and the potential for flooding have been the cause of some delay in determining the planning application for extraction. The topic has clearly given rise to widespread concern. But I have seen no evidence to show that the addition of AR processing would have the potential to harm the water environment. There would be no need for extra dewatering nor any additional impediment to underground water flows; and the operator will in any case be expected as part of any planning submission to prepare a project-level FRA covering all sources of flood risk deriving from both the extraction and recycling activities. Similarly, I am not aware of any potential for additional impacts by reference to infrastructure or aerodrome safeguarding.
92. But the effect on amenity, relating principally to the effects of noise and dust, encompassing air quality, is of greater concern. I fully acknowledge the strength of feeling on behalf of local residents on these subjects and particularly amongst those concerned with the welfare of children at the Manorcroft School. I also recognise that the area already suffers from poor air quality and noise, principally by reason of the proximity of the M25.
93. Manorcroft School lies directly adjoining the northern boundary of the allocated minerals site. It is within this area, bounded by the M25, New Wickham Lane, Stroude Road, Manorcroft Road and the school itself, that the the KDR of the PADPD directs the processing plant, albeit saying that it should be located adjacent to the M25, away from the school and toward New Wickham Lane. The AR plant would have the potential to produce noise and dust. Given the nature of the process, some emissions would be unavoidable

if the operations were to be carried out in the open air, as is commonplace. Both are best limited at source by careful siting, design and control, and by physical barriers such as bunds in the event that the distance to sensitive receptors, including to the school, proves not to provide adequate attenuation. The noise assessment background report [CDSCC35] assumes that the mineral extraction and processing activities would in any event require a site edge bund of 3 metres. It concludes that this would probably need to be increased to 4 metres to take account of AR, but that the resultant noise levels would not rise significantly. Subject to detailed assessment being made at the time of any planning application, I have seen no evidence to show that additional material harm would be caused.

94. With respect to dust, the background report [CDSCC33] is not site specific. It acknowledges the likelihood of dust generation from aggregates recycling and the potential for nuisance, even at some distance in the case of small particles. It outlines the mitigation measures which may be employed to prevent or minimise its escape from a site and the controls which the planning authority may use to enforce suppression. It indicates that a dust assessment plan would normally be required identifying sources of dust and the methodology to address potential nuisances. The Inspector who conducted the PADPD Examination took the view that for permission to be granted for the mineral extraction it would have to be shown that the site could be developed and operated without causing harm by reason of dust. I make the same assumption and that a dust assessment plan would have to be submitted, approved and implemented, with SCC monitoring and enforcing its requirements. I have no basis on which to conclude that the type of dust generated by AR would be significantly different to that caused by the winning, working and transporting of the natural mineral, or that it would not be capable of mitigation in the same way. It follows that, if the one is capable of control, then so should the other.
95. The background report mainly concentrates on the potential for dust to affect amenity, though it does accept that small (PM10) particles are associated with effects on human health. At the Hearings, I was told about the potential for harm to health from very small air-borne particles which can be carried long distances. It is right to be concerned about the risk to health, particularly in relation to children. But the evidence which I have seen is at best inconclusive. The learned paper (*Scarlett, Abbott, Peacock, Strachan & Henderson – Acute effects of summer air pollution on respiratory function in primary school children in southern England – 1996* [CD0th16] reviewed the effects of PM10s, concluding that there is evidence for a very small adverse effect. But the emissions studied appear not to have been characteristic of the kind of dusts that would be generated from a recycling plant. A more recent paper (*Kumar, Mulheron & Som – Release of ultrafine particles from 3 simulated building processes 2012*), although related to the crushing of concrete, acknowledged the limitations of a laboratory exercise. It could not conclude that the simulations or the generalisation of results represented real operational conditions, to the extent that it was unclear whether such activities produce ultrafine particles or, if so, the proportion of particle sizes.
96. Having considered all of the evidence, I take the view that there is no substantial basis on which to conclude that air-borne particles would be incapable of control by conventional means or that there would be material

harm to health.

97. The Environmental Statement submitted with the planning application for minerals extraction and restoration sets out anticipated HGV trip generation for the site. This shows that for 275 working days each year an average of 140 (2-way) trips per day could be expected, with 18 in the peak hour. No estimate has been made of the likely additional trips that would be generated by an AR facility. On the assumption that the plant would have an output of some 50,000 tpa, and lorries would carry 15 tonne payload, about 12 trips could be generated each day. However, it may reasonably be assumed that a very large proportion of the material would be "back-hauled", using the same vehicles that import the waste. SCC confirm that maximum numbers of vehicle movements, including at peak hours, would be sought as a condition of any permission granted.
98. Against that background, the Highways Authority is confident that the number and pattern of movements associated with the extraction could be accommodated on the local road network. In reaching these conclusions it took account of the necessity for the majority of the vehicles to use the Vicarage Road level crossing to the north of the site, which is an acknowledged impediment to traffic flow, but also the "airtrack" proposal, which has now been abandoned. The authority recognises the problems associated with the level crossing, but takes the view that as the number of vehicles associated with recycling would not be great, the situation would not be made significantly worse by their addition.
99. I appreciate the concerns of residents that even one extra lorry could add to traffic congestion and loss of amenity to those living along the routes and around certain pinch points. But I have been given little reason to believe that the planning application will be opposed by SCC by reference to traffic impact. If that is the case, then there is similarly no basis on which to oppose the aggregates recycling on traffic grounds.
100. I cannot conclude absolutely that the mineral extraction and the AR activities taken together would be devoid of any effect on local amenity. It would be unrealistic to expect it. It is possible that some sensitive receptors could, on occasion, be subject to noise and dust that may well be regarded as undesirable irritants to everyday living and to the work of the school. The already congested roads could from time to time be made more overcrowded. But I am not convinced that the introduction of an AR facility would significantly increase the likelihood of harm. To the extent that it may, then any such effects will have to be balanced against the benefits of recycling and the contribution that it would make to sustainable development.
101. It has been put to me that the allocation of Milton Park Farm for an AR facility would be at odds with the proposed new Policy AR1 [MM1] and the sustainability principles of the NPPF, in particular that the Council should seek to secure development that improves the economic, social and environmental conditions of the area. However, as with many planning decisions, it is clear that this involves weighing conflicting benefits and disadvantages. It does not mean that all development must have a direct local social and environment benefit. It is the net benefit, taking into account economic and sustainability benefits of recycling and minimising the disposal of waste that must also be

weighed in the balance.

102. For the purposes of estimating future output from these facilities, SCC assumes that this site will come into production during the Plan period, and continue beyond its end. Consequently, I am satisfied that reliance on this site is justified. Its allocation is sound.

Overall production from existing and "operator interest" sites

103. On the basis of the foregoing the following table shows anticipated production capacity (rounded) taking into account existing capacity and the anticipated operator sites.

Table B

Source	2016	2026
In situ recycling, existing permanent and temporary sites (from table A above)	785,000	544,000
AR1 [allocations] site: SALFORDS DEPOT	100,000	100,000
AR3 [mineral] site: MILTON PARK FARM	50,000	50,000
Total of existing provision & allocations	935,000	694,000
Excess (+) or shortfall (-) compared to targets	+135,000	-206,000

All quantities in tonnes per annum

104. If both the *Salfords Depot* and *Milton Park Farm* sites are brought forward, overall output could be maintained at or well above the 2016 target of 800,000 tpa until 2022 while several temporary sites are operating. But as these fall out of the equation, a considerable shortfall of over 200,000 tpa would arise by 2026. More detailed analysis of the figures (presented in revised Chart 8 [MM8]) shows that production capacity is likely to start falling below the 2016 target by around 2022 – 2024.
105. However, this analysis assumes that the sites will commence and cease operating as presently predicted. Experience suggests that this is rarely the case, particularly where the operation is linked to the working and restoration of a minerals site. Both to a large extent are dependent on economic factors, presently subject to great uncertainty, which affects the demand for mineral and the availability of suitable fill. In the event that commencement and / or cessation of some of the temporary facilities is delayed, then the shortfall may not be as great as these figures suggest.
106. SCC predicts that sustaining production at the 2016 target level beyond 2022 and increasing it to the 2026 target of 0.9 mtpa is challenging. If it is assumed that a permanent recycling plant would commonly produce around 70,000 tpa (the underlying assumption in the Plan) it seems likely that the equivalent of 3 new facilities would be required at that time. I conclude that the Plan should make provision for additional capacity of that order towards the end of the Plan period.
107. I now move on to consider the potential sources of recycling capacity from amongst the sites in which SCC has less confidence, by reference to the 3

main categories of site.

Other sites allocated under Policy WD2 of the Surrey Waste Plan, with potential for the development of aggregate recycling facilities

108. Policy WD2 of the SWP lists 13 sites on which permission will be granted for a variety of waste-related development including recycling, storage, transfer, materials recovery and processing facilities, excluding thermal treatment, subject to meeting their KDC. The sites therefore already have "in-principle" policy support for waste-related development, subject to consideration at the planning application stage of the effects of specific proposals. 3 of them: *Weylands Treatment Works, Hersham, Oak Leaf Farm, Stanwell Moor and Reigate Road Quarry, Betchworth* are already listed as existing permanent sites. 6 more are identified in the AR Plan: *Charlton Lane, Shepperton; Copyhold Works, Redhill; Lyne Lane, Chertsey; Martyrs Lane, Woking; land adjacent to Trumps Farm, Longcross; and land at former airfield, Wisley.*
109. Of the remainder some, such as *Heather Farm, Horsell*, are no longer available [CDNat57]. 2 found their way into the Short List [CDSCC31], but were considered unsuitable. None of them were put forward for allocation in representations.
110. It is important to note that the 6 sites identified in the Plan are not new allocations, simply existing allocations on which the present plan relies to make sufficient AR provision. All of the policies and the KDC in the SWP continue to apply and do not need to be repeated in the present plan. Against that background, my approach is to take as the starting point the conclusions of the Inspectors who conducted the Examination into the SWP. As that plan was found sound and the sites are formally allocated, I would only have reason to find their inclusion in the present plan unsound if new evidence calls into question those conclusions with respect to AR.
111. The fact that the SWP was successfully challenged in relation to an allocation for a thermal treatment facility at *Clockhouse Brickworks, Capel*, subsequently deleted on the Order of the High Court, does not undermine the validity of the remaining allocations which were not challenged, the soundness of the Plan as now adopted or the conclusions of the SWP Inspectors [CDOth18]. It may disappoint some representors, but it is not the purpose of this Examination to re-open debate into the suitability in principle of the sites for waste-related development. I address the sites in turn:

Charlton Lane, Shepperton

112. Following discussion at the Hearings, SCC is seeking to delete this allocation from the Plan [MM8]. Most of the SWP allocation area has received permission for the construction of an "Eco Park", incorporating a range of waste management facilities, though not aggregates recycling. Should this project go ahead - and I have no reason to suppose that it will not - the amount of land remaining for AR would be far smaller than SCC estimates as being necessary for such facilities, and probably inadequate. Indeed, notwithstanding that there could be some synergy between the uses, the Plan as submitted acknowledges that the development of the site as proposed would make it less likely to be available for AR. Moreover, most of the land identified is presently required to accommodate landscaping, including that

needed to help screen the Eco Park from the adjacent M3 motorway. Even if an AR plant could physically be accommodated, much of the potential for screening would be lost, either directly or because of the need to access the site. In conclusion, I have no confidence that this site would be either suitable or available. Its identification would be unsound; and I therefore agree that it should be deleted from the Plan.

Copyhold Works, Redhill

113. This site, located just to the east of the urban area of Redhill, is occupied by a derelict works and adjoins the large active Patteson Court Landfill site. The KDC in the SWP relate to visual impact, the Green Belt, design and access.
114. The Inspectors who conducted the Examination into the SWP concluded that, subject to access being achieved via Cormongers Lane and a building design sensitive to and informed by the outcome of visual impact assessment, there would be no harm additional to that arising from inappropriate development in the Green Belt. They believed that there was a reasonable prospect of very special circumstances being shown for development up to the full extent of the 5.5ha allocation. There is considerable potential to carry out visual improvements, and the synergy that is potentially achievable with the landfill could amount to the site specific material consideration necessary to accord with SWP Policy CW6.
115. With respect to its identification in the present Plan, most concern locally relates to the effect of traffic on Nutfield Road and on settlements to the east, through which heavy vehicles may pass. The need for a transport impact assessment at the planning application stage is identified in the Plan as a KDC. Of the 2 direct accesses shown on the allocation plan, the one to the west is in close proximity to dwellings. That to the east has poor visibility. Neither is likely to be acceptable. Rather, as the SWP states, consideration should be given to link with the landfill to minimise overall traffic, and to share the access to Cormongers Lane.
116. The junction of that road with Nutfield Road (A25) is not ideal. The latter is heavily trafficked, there is limited visibility and another smaller junction opposite. Nonetheless, it is already used extensively by lorries accessing the landfill. There is a legally enforceable cap on the use of the landfill access (presently 600 movements per day, reducing to 400 in 2015). This takes account of the cumulative impact on the road network of projected movements related to mineral working at *Mercers Farm* and *Chilmead*.
117. I understand the concern of local people: there are narrow sections of road, particularly in some of the villages including Nutfield through which a proportion of the heavy vehicles may be expected to pass. Although the A25 has sufficient theoretical capacity, it is heavily trafficked and I do not doubt that heavy vehicles add to congestion and contribute to the loss of amenity and at least the perception of hazard. I recognise that there have been times when the cap on vehicle movements to and from the landfill has been exceeded. Nonetheless, on the basis of present information, I have no basis on which to conclude that the amount of vehicular traffic would be any greater than that which could arise in any event from the use of the landfill, or if the site were to be developed for one of the other types of waste processing for

which it has been identified in the SWP.

118. Overall, I have been given no convincing reasons to depart from the view of the SWP Inspectors that, subject to applying the KDC of that plan, this site is suitable for an AR facility. The allocation is sound.

Lyne Lane, Chertsey

119. This land is also allocated under SWP Policy WD1 for use as a Civic Amenity (CA) site. It has been in waste use before, including landfill and for open windrow composting, though it is presently unused. Although outside the urban area, it is in a location heavily affected by infrastructure development, including the junction of the M3 and M25 motorways, an adjacent railway line and a sewage treatment works opposite. The KDC in the SWP relate to the Green Belt, visual impact, traffic impact, scale, air quality and flood risk.

120. The SWP Inspectors concluded that subject to satisfactory outcomes from the various project specific assessments required by the KDC, it is unlikely that there would be other planning harm in addition to that from inappropriate development in the Green Belt; and there is potential for synergies by co-location of several types of facility covered by Policy WD2. They believed that there was a realistic prospect that very special circumstances could be shown in relation to the Green Belt and supported the allocation of the full 2.7 ha site within Policies WD1 and WD2.

121. I have been given no convincing reasons to depart from those views. Subject to applying the key development criteria of the SWP, this site is suitable for AR. The allocation is sound.

Martyrs Lane, Woking

122. This site comprises disused filled land, poorly restored and partly naturally regenerated. It is located to the north of urban development at Sheerwater and lies to the rear of a modern recycling centre. The KDC in the SWP relate to the Green Belt, access, contaminated land, landscaping, restoration, the requirement to extend the existing CA site, emissions to air and flood risk.

123. It is not intended that the present access to the CA site would be shared. The SWP Inspectors concluded that the highway works required to provide acceptable access from the A320 raise ecological and land ownership issues, the resolution of which are uncertain. This potential harm must be added to harm by reason of inappropriate development in the Green Belt.

124. Amongst other things, the KDC for this site say that, for Green Belt reasons, built development may have to be restricted to the western end of the site – adjacent to the CA site. This would then provide an opportunity to restore the remainder properly, with a view to creating a nature conservation area, public access and long-term management. These benefits would be a requirement of any permission granted.

125. I recognise that the presence of an AR facility may not be welcomed by users of the nearby New Zealand Golf Course. Golf is generally a rural activity for which attractive surroundings and peace and quiet are important. Some of the fairways are close to the boundary of the site, but screened by trees.

Although these matters are not addressed in the KDC, SCC envisages that, as the facility would be permanent, it would be likely to be enclosed, thereby minimising the potential for noise and disturbance to golfers.

126. I am aware of the planning application for an applied technology centre for McLaren on land to the east of the A320. Present information does not suggest that the 2 uses would be incompatible. Nonetheless, any planning application would have to take account of the combined traffic generation, together with any potential for additional noise and disturbance to the golf club.
127. I have been informed that the owners of the site are aware of the proposed allocation in the Plan, but have not indicated whether they would be interested in pursuing development. This is clearly not a site on which SCC can rely. However, the SWP Inspectors considered that the level of uncertainty was not so great as to exclude the site from the allocations of that plan; and I have been given no convincing reasons to depart from their view. Subject to applying the KDC of that plan, this site is suitable in principle for AR. It is sound.

Land adjacent to Trumps Farm, Longcross

128. This disused site is allocated under SWP Policies WD2 and WD5 (thermal treatment facilities). It lies adjacent to the M3, from which it is partly screened by naturally regenerated vegetation, and a former landfill. It was once used in connection with the construction of the motorway but has never been properly restored.
129. The Inspectors who examined the SWP observed that, at that time (December 2007), SCC preferred this site to Charlton Lane, Shepperton for an Energy-from-Waste plant. However, as indicated above, permission has now been granted for such a plant at Charlton Lane as part of the Eco-Park proposals. The site may therefore be available for other waste-related facilities.
130. As the site has the advantage of being in the ownership of SCC, the SWP Inspectors concluded that its most significant feature was its availability and the likelihood of it being brought forward by the County Council itself. They identified the difficult access to the site as a significant constraint and also acknowledged that reliance would have to be placed on the general factors of Policy CW6 to demonstrate very special circumstances in the Green Belt. However, they considered overall that all potential planning impacts could properly be left to project level assessments.
131. Though I am not aware of any immediate intention of SCC to develop the site, I have been given no convincing reasons to depart from the view of the SWP Inspectors. Subject to applying the KDC of that plan, this site is suitable for AR. The allocation is sound.

Land at former airfield, Wisley

132. This disused land comprises the north-western corner of the former airfield and extends to nearly 17 ha. It has partly regenerated, though some old hardstandings and roadways still remain. Permission was granted in 2010 for an in-vessel composting (IVC) plant on part of the site, mostly on the old

hard-surfaced area. The land within the site further to the east is required as a stand-off from the dwellings at Elm Corner. More to the west is required for a new access road taken from a point close to the grade-separated junction on the Portsmouth Road at Stratford Bridge; and some of the remainder would be required for ecological improvement and landscaping. This would leave only in the region of 3ha of land available for an AR plant to be situated to the north of the access road. All of that is vegetated, and all is within an area defined as a Site of Nature Conservation Interest (SNCI).

133. To date, the IVC plant has not been built, though I have been given no reason to believe that it will not be in due course. I understand that the owners of the site are aware of the proposed allocation for an AR facility, but have not given any specific indication of their support for it. If the facility is built, I share the doubts of those who argue that there could in practice be insufficient land available for an AR plant without compromising the SNCI and the intended landscaped setting of the IVC plant. This leads me to conclude that there must be considerable uncertainty that it will be available for AR. Much might depend on the particular nature conservation interest of the available land and the practical opportunities to provide sufficient landscaping. I do not have sufficient information on those matters. However, if the plant is not built, I am satisfied that the site is suitable for a stand-alone AR facility. The HRA demonstrates no likely effect on the Thames Basin Heaths SPA, the boundary of which is close by; and impact on the Royal Horticultural Society Land is unproven.

134. There are clear parallels with the position of the site at *Charlton Lane, Shepperton*, which SCC proposes to withdraw from the Plan on the grounds that there is insufficient land available for both the proposed Eco Park and an AR facility. However, I consider the situation at Wisley to be less clear cut. While acknowledging the doubts over land availability, and subject to applying the key development criteria of the SWP, I am content on balance, for the allocation to remain in the Plan.

135. Overall, I am satisfied that, apart from *Charlton Lane, Shepperton*, it is reasonable for the other 5 sites to be identified as being suitable in principle for AR development.

Sites allocated under Policy AR1

136. In addition to the "operator interest sites", Policy AR1 allocates 2 more temporary sites at *Alton Road, Farnham*, and *Stanwell Quarry, Stanwell*. As I indicated earlier in the report, the second of these is proposed to be moved from this policy to the list of existing temporary sites, as planning permission has now been granted for an AR facility there [MM9].

Alton Road, Farnham

137. As a disused sand quarry, SWP Policy WD3 lends support to this site in principle. It was partly filled with non-inert waste some time ago, but has a fairly large void remaining unrestored. There is an extant planning permission for sand extraction which includes a requirement for restoration, but little if any sand has been taken from it recently, and no restoration scheme is in place. The permission is due to expire next year. Though there has been a

degree of natural regeneration of vegetation, the site has clearly been left unfinished. It is not attractive and in its present state has little value for any purpose. Although it is not visually prominent, I agree with SCC that it would be beneficial for restoration to be completed, not least because of its location in an Area of Great Landscape Value.

138. I also accept that, because it is not well located in terms of Surrey's waste arisings, as things stand there is little likelihood of it attracting sufficient suitable waste to achieve restoration within the foreseeable future. This is particularly so as it is located within a few miles of *Homefield Sandpit*. Lack of sufficient suitable fill to restore mineral workings to their pre-existing levels is highlighted in SCC's adopted Minerals Site Restoration Supplementary Planning Document [CDSCC7]. Consequently, low level restoration is recommended for some of the sites for which indicative schemes are included in that document. The Alton Road site is not amongst those, but nonetheless is referenced as one of a number of existing workings in the Farnham area whose restoration would provide considerable benefit for landscape, recreational and biodiversity reasons, as well as increasing certainty for local residents.
139. The importation of unrecycled inert wastes as fill would in any case be inherently unsustainable. On the other hand, the installation of a temporary aggregates recycling facility as envisaged in the Plan could provide the necessary opportunity for a more sustainable option. The operators estimate that a plant with an output of 100,000 tpa could be installed, but SCC cautiously estimate that a figure of about half that may be more realistic in view of the location and other local recycling opportunities. Consequently the amount of residual waste available for fill would be limited. The final landform would have to be drawn up taking account of this in order to achieve completion of restoration within a reasonable timescale. However, presently there appears to be no alternative means of securing it.
140. Access is by way of an existing trackway from the A31. It is not ideal, as it passes under a narrow railway bridge. But I understand that it has been used successfully in connection with the sand pit and I have no reason to believe it would not be suitable to serve an AR plant.
141. Concern has been expressed by some local residents, based on their previous experience of work at the site, that a recycling plant and restoration would give rise to unacceptable noise and disturbance, especially to those living on the north-western side of Wrecclesham Hill. But I am reasonably satisfied that, provided the plant were to be located away from the housing in the lower part of the site, it would be possible for it to be operated without undue harm to amenity. Some noise attenuation barriers are already in position, but the KDC for the site set out in the Plan acknowledges that further mitigation may be necessary.
142. The vegetation which has naturally grown up on the site in the 20 or so years that it has remained largely idle doubtless provides a habitat for wildlife. I am told that it is used by foraging bats and that otters have been seen within a mile. Schedule 1 birds have been recorded breeding there, and there are reports of common lizards and badgers on or near it. However, I do not know the provenance of this information.

143. My attention has been drawn to a legal judgment (*Woolley vs Cheshire East Borough Council & Millenium Estates Ltd*) concerning the need to comply with the requirements of the EC Habitats Directive before planning permission is granted where there is a reasonable likelihood of a European protected species being present. However, this does not apply directly to plan-making. Nonetheless, an Appropriate Assessment [CDSCC26], required by the Conservation of Habitats and Species Regulations, 2010 has been undertaken for the Plan with respect to the potential for its policies and site-specific proposals to have significant effects on SPAs, SACs and Ramsar sites in Surrey and within 10 kilometres of its boundary. An assessment of no significant impact was found for all. Even so, that does not remove the need for any future planning application to be assessed under the requirements of the Regulations.
144. It was not necessary for SCC to undertake a detailed environmental survey of the site prior to allocating it. If, when considering a planning application, it is found that a protected species would be affected, then that could mean that permission would be refused, or mitigation of effects required. It is not appropriate, or indeed always possible, to settle all detailed matters at the plan-making stage which should properly be addressed in the light of detailed proposals. For now, I have no detailed evidence of the wildlife value of the site. I acknowledge that a full restoration would result in the loss of much of the natural regenerated vegetation. Any harm identified would have to be balanced against the benefits which a comprehensive restoration could provide.
145. That said, I have some sympathy with the views of some local residents that the overall assessment process undertaken by SCC which has led to the allocation of this site was in some respects opaque. For example, it is unclear why it was not recommended for inclusion in the "long list" of sites [CDSCC30], but later included in the short list [CDSCC31]. However, its shortcomings are not so great as to warrant a finding of unsoundness.
146. The operators of the site already run a recycling plant (at *Stanwell Quarry*) and though not actively pursuing a planning application at the Alton Road site must be aware of the likely viability of running a similar plant there. Unlike with some other sites, no indication has been given by them that they would not be interested. While I recognise that that is far from providing certainty of their intentions, it would be premature to reject the site outright on grounds of non-availability. The economic situation could be very different towards the end of the Plan period when several existing temporary sites fall out of the equation and greater capacity is required.
147. To conclude, I take the view that there must be uncertainty over the deliverability of this site. The desirability of achieving its restoration is the main factor in its favour. But it is an important factor that amongst other things distinguishes it from the *Homefield* site, which already has a viable scheme for restoration in place. Notwithstanding the uncertainty, I conclude on balance that it adds flexibility to the Plan, which is not made unsound by its inclusion.

Sites allocated under Policy AR3

148. Policy AR3 identifies 5 further sites for aggregates recycling facilities, each of which is allocated as a preferred area for the extraction of concreting aggregates under Policy MA2 of the PADPD. All are within the North West Surrey sector.
149. Following consideration at the Hearings, SCC proposes to delete 2 of the sites from the policy because the owners / operators have indicated that they have no intention of developing them for the purpose: *Homers Farm, Bedfont and Watersplash Farm, Halliford*. They are therefore undeliverable, and their inclusion would render the Plan unsound as it would be ineffective. As previously indicated, SCC also propose to delete *Whitehall Farm, Egham*, because that site would only be developed as a continuation of *Milton Park Farm*, beyond the Plan period. I support the deletion of these sites. A main modification is proposed **[MM16]**.
150. I consider the remaining sites : *Addlestone Quarry Extension, Addlestone and Hamm Court Farm, Chertsey* together, as they share a number of characteristics. Though both benefit from the conditional presumption in favour of recycling of C, D & E wastes at mineral sites contained in Policy WD3 of the SWP, neither will contribute to AR provision in 2026 because, on present expectations, both quarries would be complete before then. Only if extraction or, more likely, restoration were to be delayed would there be the opportunity for them to contribute to the AR provision in 2026.
151. Both sites are situated within land subject to flood risk including Flood Zone 3. Consequently, the Council's *Strategic Flood Risk Assessment Report* [CDSCC53] says that detailed, site-specific FRA would be needed at an early stage in order to determine whether there are sufficient areas of land within the sites to accommodate recycling facilities that are subject to no greater than Zone 3a fluvial flood risk. The KDR set out in the Plan make the need for FRA explicit. It would have to demonstrate that the sequential approach had been applied to the selection of the location of the recycling plants. Though this presents a constraint, I have been given no evidence to suggest that suitable locations could not be found within the sites.
152. Both sites are also in the Green Belt. At the time of any application, the developer would have to demonstrate compliance with SWP Policy CW6. It is possible that a good argument could be put forward under the heading of *wider environmental and economic benefits of sustainable waste management* by reference to making a contribution to the supply of recycled aggregates and reducing landfill. But it would be premature to reach a firm conclusion as to their acceptability in Green Belt terms ahead of a detailed planning application being made.
153. The planning application for *Addlestone Quarry Extension* allows for infilling with inert materials, but this has not yet been determined. The Inspector who conducted the Examination into the PADPD observed [CD0th18] that the access and processing infrastructure are already in place. She concluded that the KDR and matters of concern, including hydrology, noise, dust, archaeology and restoration, are capable of being satisfactorily addressed through good site design, planning conditions and, if necessary, obligations.

154. This site has not attracted any outright opposition though in the context of its proximity to the River Wey, the Environment Agency (EA) has highlighted the need for ecological and groundwater studies in addition to a FRA. These are included as KDR. The EA considers that other sites with lower constraints may be more appropriate. This calls into question whether the site is deliverable, but does not inevitably lead to a conclusion of unsoundness.
155. The Examination Inspector for the PADPD considered the *Hamm Court Farm* site by reference to several issues, including the potential impacts in terms of noise, dust, traffic, loss of biodiversity, harm to heritage assets, visual disturbance and disruption to local residents, the implications for flood risk and surface water drainage and uncertainty about the estimated yield as well as the fear that pressure would be brought for the release of adjoining land at Chertsey Mead. But she concluded that any concerns about unneighbourly impact or harm to habitats and the environment could be satisfactorily addressed through good site design and planning conditions.
156. Representations to the present Plan rehearsed similar concerns and to some extent may be seen as objecting to the minerals extraction as well as AR. But I have seen no evidence to show that the AR processing would give rise to any significant additional harm or that any such harm could not be similarly mitigated.
157. Overall, I conclude with respect to these 2 sites that, subject to the KDR being met, they may have the potential to contribute to recycled aggregates production and reduction in landfill. However, if the associated mineral extraction and restoration is complete in the earlier part of the Plan period, there may not be a pressing need for AR facilities at them. They are not essential to meeting the production target for 2016 but could provide some flexibility to the Plan in the event that some existing sites cease operating or those with "operator interest" do not come on stream or are delayed. With those caveats, I am content that the allocations are sound.

Production from windfalls (unidentified sites)

158. Policy AR2 of the submitted Plan provides a general basis for assessing proposals which may come forward outside allocated or identified areas. The Plan assumes that up to 70,000 tpa of additional "windfall" capacity, equivalent to a single new site, could come forward by this route, but again subjects this figure to the 25%, 50% or 75% range of scenarios.
159. Just 2 additional sites were put forward for allocation by representors. That supports SCC's contention that it has considered all reasonable alternatives; and I consider it unlikely that any more significant sites will emerge during the life of the Plan. Nonetheless, while I do not recommend allocation of the 2 proposed additional sites, I do conclude that they have the potential to make a contribution to windfall capacity. It is equally possible that some other existing temporary sites may have their life extended, or that sites may increase their production capacity. The modest figure suggested by SCC therefore appears realistic. It is sound.
160. Table C below shows additional capacity in 2026 from other identified sites and windfalls under the 3 scenarios.

Table C

Source	Proportion in production	Output 2026
SWP Policy WD2 sites (assumed 70,000 tpa capacity each)	25%	87,500
• Copyhold Works	50%	175,000
• Lyne Lane	75%	262,500
• Martyrs Lane		
• Trumps Farm		
• Former airfield, Wisley		
Policy AR1 [new allocations] site	25%	12,500
• Alton Road Farnham	50%	25,000
(assumed 50,000 tpa capacity)	75%	37,500
WINDFALLS (assumed 70,000 tpa capacity)	25%	17,500
	50%	35,000
	75%	52,500
TOTALS	25%	117,500
	50%	235,000
	75%	352,500

All quantities in tonnes per annum

161. If all of this capacity were to be provided, it would amount to some 470,000 tpa, compared to 206,000 tpa required to meet the SEP target for 2026. As SCC recognise, it seems highly unlikely that all will come forward, particularly in view of the serious uncertainties concerning the *Wisley* and *Alton Road, Farnham* sites. For the target to be met would require a minimum of around 44% of the potential. In practical terms, that would amount to roughly 3 new sites from the 6 allocated, or perhaps 2 together with windfalls.

162. I cannot say which sites may be developed: there are too many variables and unknown influencing factors. So we are left with an element of uncertainty. Plan-making naturally seeks to maximise certainty with respect to the provision of necessary development – indeed, it is one of its primary purposes. However, the ability to predict events inevitably becomes less precise the further into the future one looks. This is particularly so in the present very uncertain economic climate. The NPPF recognises what might be termed this “rule of diminishing certainty” with respect to house building, when it says that a Plan should identify and update annually a supply of specific, developable sites for years 1-5. For years 6-10, a supply of specific developable sites or broad locations should be identified and, where possible, this should also be done for years 11-15. Though house building may be distinguished from aggregates recycling in many ways, the principles of having greater certainty in the early years and regular review, seems equally applicable.

163. In addition to the on-going monitoring of its Plans, as reported in the Annual Monitoring Reports, SCC has committed itself to revising its Minerals and Waste Development Scheme, with a view to committing itself to undertaking a review of the Waste Plan, to include addressing issues surrounding aggregate recycling in the 2020s [CDSCC162]. The 2018 end date of the SWP is well before the time when there may be a risk of provision being inadequate, allowing

remedial action to be taken. A Review at around that time would allow the Council to take account of: progress towards meeting the necessary provision; the need or otherwise for more sites to come forward; the likelihood of the allocated or identified sites fulfilling that requirement; and whether any remedial action is required in the event that the Plan appears to be going off course for any reason. In that way, I consider that the Plan provides an acceptable framework for maintaining the required level of aggregates recycling provision over its lifetime.

164. On that basis, I am reasonably satisfied that the case has not been made out that the Plan (as proposed to be modified, including taking account of the revised predictions) is fundamentally unsound with respect to the level of provision. Consequently, there is no basis on which to recommend any additional sites to be allocated to provide future recycling capacity. Nonetheless, I briefly consider the merits of the 2 sites which have been proposed.

Additional / alternative sites

Homefield Sandpit, Runfold

165. Homefield is an existing well-run and productive aggregates recycling site within a quarry which still produces small quantities of sand. An end-date of 2042 for final restoration was set by conditions approved as part of the Review of Minerals Permissions in 1997. Part has been restored under a scheme approved in 2003, but a significant void, extending to some 1.9 million tonnes, remains. In 2005 and 2009, limited time permissions (ending in 2020) were granted for recycling plant involving the screening and washing of C, D & E waste. A range of high quality recycled aggregate is produced, with the larger material being taken off site for crushing elsewhere. Residual waste is used for restoration purposes. Although the washing plant has the capacity to produce 175,000 tpa of recycled material (of which up to 150,000 tonnes would be of high quality) the recycling permission limits the quantity of material which may be exported to 45,000 tpa of soil and 24,000 tpa of brick and concrete for crushing.

166. It is evident that the recycling operations contribute to the restoration of the site, but that this is very unlikely at present rates of production to be completed by 2020. Although there would be another 22 years before it would have to be finished, infilling with anything other than residual waste would be significantly less sustainable, as would a delay in completion.

167. The operator's intention is to seek an extension of the life of the recycling plant beyond 2020. This would have a number of benefits, including contributing to the earlier restoration of the site and the sustainable use of waste in line with Policy AR4 of the Plan which seeks aggregate recycling facilities to maximise the amount and range of recyclable material that can be recovered. It would also provide a more balanced geographical distribution of AR capacity. The short list site assessment [CDSCC31] indicates that the site has potential for intensification or expansion. Certainly there is plant capacity and there are good practical arguments for allowing an extension of time and / or a greater output, subject to environmental considerations including the effect on nearby residents and on the Area of Outstanding Natural Beauty within

which the site lies.

168. However, there is no advantage to be gained either in relation to the soundness of the Plan or to the operator by allocating the site specifically within the Plan. The Plan makes adequate provision for recycling capacity for most of its term, with a reasonable expectation of meeting the targets for the end of the period. It is therefore sound without the need to allocate additional sites. Moreover, situations such as this are covered exactly by the provisions of Policy AR2 which, subject to the locational and development management policies set out in the SMPCS and the SWP, gives support for (amongst other things) the intensification or extension of existing aggregate recycling facilities outside the preferred areas in the plan, where it can be demonstrated that the development would result in an increase in the recovery of C,D&E waste material suitable for the production of recycled aggregates (my emphases). In short, provided that whatever is proposed for the site can be shown to be environmentally acceptable – a proviso that in any event applies equally to allocated sites – the Plan would provide no less support to this site than to one which is allocated.

169. I conclude that the site has the potential to contribute to the achievement of the targets as a windfall to be considered under Policy AR2, and in that way to contribute to the soundness of the Plan. But it is not necessary in the interests of soundness for it to be specifically allocated under Policy AR1.

Lambs Brickworks

170. The operators of this site propose its allocation either in addition to, or in substitution for *Salfords Depot* allocated under Policy AR1. I have found that allocation sound and also concluded that there is a reasonable expectation of sufficient recycling capacity coming forward from other allocated sites to meet the targets for 2016 and 2026. Consequently, as with *Homefield Sandpit*, there is no pressing need to allocate this site.

171. The site has extant permissions for clay working and infilling of mineral void and for the recycling of rail ballast. Like *Salfords*, it has rail access, which is inherently sustainable. Moreover, there is no doubt that recycling of C, D & E wastes would contribute to restoration of the voids, and this too is a benefit. There is also some potential for synergy with skip-hire operators and a ready-mix plant at the adjacent business park; and it has a willing operator. It was assessed as having potential in the Long List assessment (subject to rail access only or access improvements and movement restrictions being agreed), but excluded in the Short List, principally because a permanent site in the Green Belt was not favoured, and owing to transportation constraints.

172. Against that background, I have some sympathy for the operator's argument that the assessment process for the consideration of alternative sites has not always been entirely consistent. The Green Belt argument is not conclusive as to unacceptability, as the SWP allocates a number of sites for permanent development in the Green Belt, some of which are carried forward in the AR Plan. Similarly, poor proximity to arisings has not been a bar to allocation of some other sites.

173. Lambs Business Park, covering the adjacent former brickworks site, has been

designated as a Major Developed Site in the Green Belt. A site brief, in the form of Supplementary Planning Guidance (SPG) was prepared in 2004 by Tandridge District Council. This has as a fundamental objective the limitation of traffic generation from the site. It set an overall daily maximum of 632 vehicle movements along Terracotta Road, which forms the access. The business park presently operates close to that limit, but the presently permitted mineral extraction, filling and recycling activities are not covered by it. The anticipated traffic generated by AR would not be significantly different to what is presently allowable under the extraction, infilling and recycling operations.

174. At one point during the Hearings, when it was concerned that insufficient AR capacity would be provided for in the Plan, SCC suggested a Main Modification allocating the site. This was subsequently withdrawn when it was shown that there was a reasonable expectation of the targets being met. It may be concluded that while not actively favouring the site, SCC acknowledge that it is not wholly unacceptable.
175. In the context of my earlier conclusions, it is unnecessary in the interests of soundness for this site to be specifically allocated under Policy AR1. Though I acknowledge that it has a number of undisputed advantages, it would be perverse to promote its development if that could compromise the District Council's objective of limiting traffic generation. That is not to say that the site may not have potential to contribute to provision as a windfall under Policy AR2. However, this may be dependent on a scheme being drawn up that would not materially increase traffic generation from all of the non-business park activities.

Issue 5 - Are the monitoring / implementation arrangements in the Plan fit for purpose?

176. The Plan includes monitoring and implementation frameworks for the policies in the Plan. They are brief and simple, chiefly relating to whether the Plan is being successful in increasing aggregate recycling production in accordance with the requirement. A Main Modification [**MM21**] is proposed to take account of the introduction of a new policy AR1 (Presumption in favour of sustainable development). It is not necessary to include separate monitoring of the environmental effects of aggregates recycling, including on road safety and on communities. These matters are already covered by the framework included in the SMP Core Strategy. The framework is sound as proposed to be modified.

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Assessment of Legal Compliance

177. My examination of the compliance of the DPD with the legal requirements is summarised in the table below. I conclude that it meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Plan is identified within the approved LDS July 2011 which sets out an expected adoption date of July 2012. The Plan's content and timing are broadly compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed Main Modifications.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	An Appropriate Assessment under the Habitats Regulations has been carried out.
National Policy	The Plan complies with national policy.
Regional Strategy (RS)	The Plan is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

178. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

179. The Council has requested that I recommend Main Modifications to make the Plan sound and capable of adoption. I conclude that with the recommended Main Modifications set out in the Appendix, the Aggregates Recycling Joint Development Plan Document for the Minerals and Waste Plans within the Surrey Minerals and Waste Development Framework satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in PPS12.

Jonathan G King

Inspector

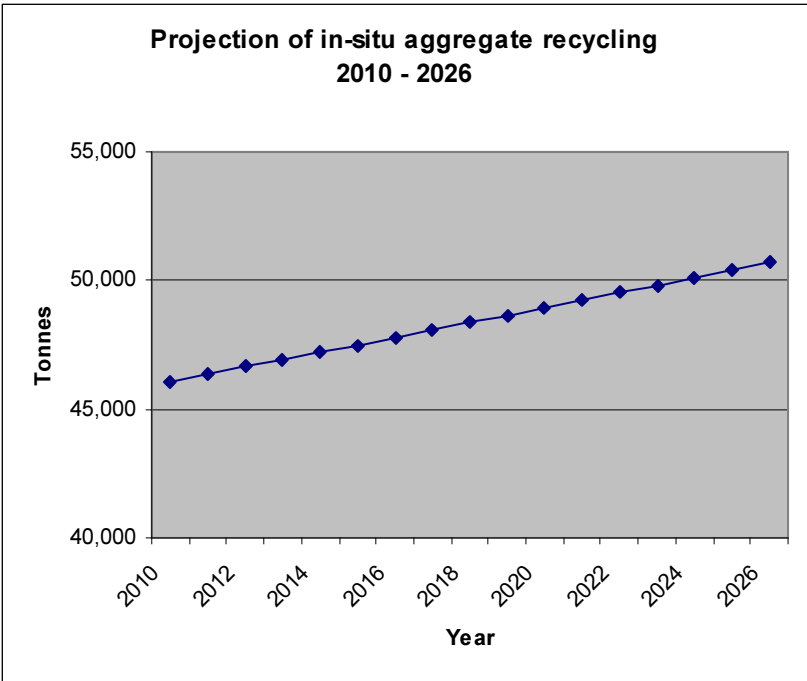
This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The page numbers, policy and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text. Minor and consequential changes are to be found in the County Council's Schedule of Additional Modifications.

Ref	Page	Policy/ Para	Main Modification
MM1	1	Intro	<p><i>Insert new paragraphs following para 1:</i></p> <p>'At the heart of the National Planning Policy Framework introduced in March 2012 is a presumption in favour of sustainable development. This requires local planning authorities to positively seek opportunities to meet the development needs in their area. Policy AR1 takes account of the requirement for all plans to be based upon and reflect the presumption in favour of sustainable development.</p> <p>Policy AR1 – Presumption in favour of sustainable development</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Plan (and, where relevant, with policies in other plans (such as District, minerals and waste plans)) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted.'
MM2	9	para 34	<p><i>After 'Chart 1' insert:</i></p> <p>'based on 2010 sales set out in the Annual Monitoring Report 2010 / 2011'.</p>

Ref	Page	Policy/ Para	Main Modification																																				
MM3	9	para 34 line 4	<p>Replace: '191,500' with '232,000' & '265,000' with '306,000'.</p>																																				
MM4	10	Chart 1	<p>Replace Chart 1 with:</p> <div data-bbox="639 434 1425 1097" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;">Projection of sales from existing permanent sites 2010 - 2026</p> <table border="1" style="display: none;"> <caption>Projection of sales from existing permanent sites 2010 - 2026</caption> <thead> <tr> <th>Year</th> <th>Sales, tonnes</th> </tr> </thead> <tbody> <tr><td>2010</td><td>232,000</td></tr> <tr><td>2011</td><td>255,000</td></tr> <tr><td>2012</td><td>255,000</td></tr> <tr><td>2013</td><td>280,000</td></tr> <tr><td>2014</td><td>285,000</td></tr> <tr><td>2015</td><td>285,000</td></tr> <tr><td>2016</td><td>285,000</td></tr> <tr><td>2017</td><td>285,000</td></tr> <tr><td>2018</td><td>290,000</td></tr> <tr><td>2019</td><td>290,000</td></tr> <tr><td>2020</td><td>295,000</td></tr> <tr><td>2021</td><td>295,000</td></tr> <tr><td>2022</td><td>295,000</td></tr> <tr><td>2023</td><td>295,000</td></tr> <tr><td>2024</td><td>300,000</td></tr> <tr><td>2025</td><td>300,000</td></tr> <tr><td>2026</td><td>306,000</td></tr> </tbody> </table> </div>	Year	Sales, tonnes	2010	232,000	2011	255,000	2012	255,000	2013	280,000	2014	285,000	2015	285,000	2016	285,000	2017	285,000	2018	290,000	2019	290,000	2020	295,000	2021	295,000	2022	295,000	2023	295,000	2024	300,000	2025	300,000	2026	306,000
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2025	300,000																																						
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MM5	11	Chart 2	<p>Replace Chart 2 with:</p> <div data-bbox="639 1189 1441 1883" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;">Projection of sales from existing temporary sites 2010 - 2026</p> <table border="1" style="display: none;"> <caption>Projection of sales from existing temporary sites 2010 - 2026</caption> <thead> <tr> <th>Year</th> <th>Sales, tonnes</th> </tr> </thead> <tbody> <tr><td>2010</td><td>146,100</td></tr> <tr><td>2011</td><td>146,100</td></tr> <tr><td>2012</td><td>346,100</td></tr> <tr><td>2013</td><td>546,100</td></tr> <tr><td>2014</td><td>546,100</td></tr> <tr><td>2015</td><td>446,100</td></tr> <tr><td>2016</td><td>446,100</td></tr> <tr><td>2017</td><td>371,100</td></tr> <tr><td>2018</td><td>361,100</td></tr> <tr><td>2019</td><td>361,100</td></tr> <tr><td>2020</td><td>361,100</td></tr> <tr><td>2021</td><td>361,100</td></tr> <tr><td>2022</td><td>346,100</td></tr> <tr><td>2023</td><td>346,100</td></tr> <tr><td>2024</td><td>186,100</td></tr> <tr><td>2025</td><td>186,100</td></tr> <tr><td>2026</td><td>186,100</td></tr> </tbody> </table> </div>	Year	Sales, tonnes	2010	146,100	2011	146,100	2012	346,100	2013	546,100	2014	546,100	2015	446,100	2016	446,100	2017	371,100	2018	361,100	2019	361,100	2020	361,100	2021	361,100	2022	346,100	2023	346,100	2024	186,100	2025	186,100	2026	186,100
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MM6	11 & 12	para 39 lines 5 & 6	<p>Replace: '53,000' with '46,100'.</p>																																				

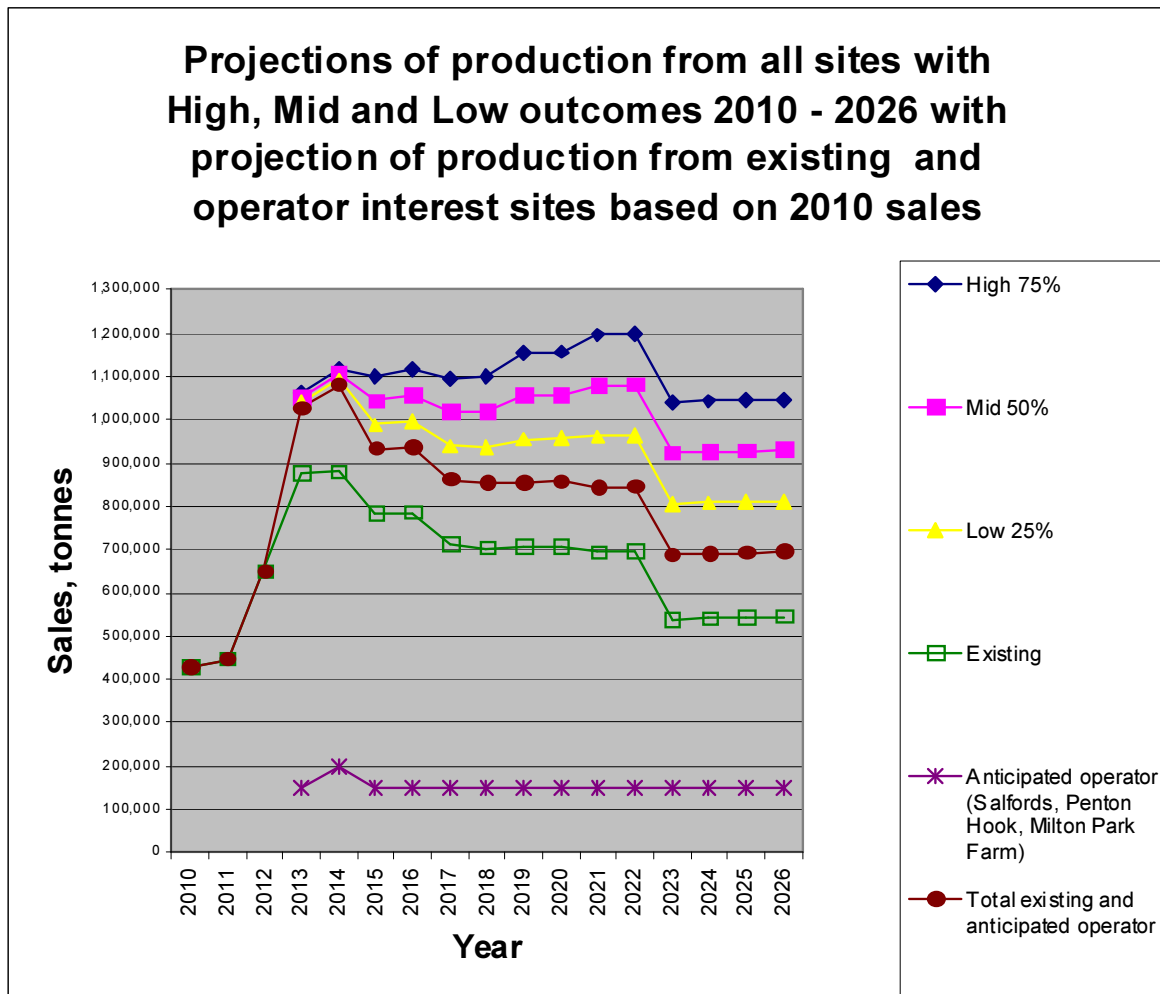
Ref	Page	Policy/ Para	Main Modification																																				
			'58,000' with '51,000'.																																				
MM7	12	Chart 3	<p>Replace Chart 3 with:</p>  <table border="1"> <caption>Projection of in-situ aggregate recycling 2010 - 2026</caption> <thead> <tr> <th>Year</th> <th>Tonnes</th> </tr> </thead> <tbody> <tr><td>2010</td><td>46,000</td></tr> <tr><td>2011</td><td>46,500</td></tr> <tr><td>2012</td><td>47,000</td></tr> <tr><td>2013</td><td>47,500</td></tr> <tr><td>2014</td><td>48,000</td></tr> <tr><td>2015</td><td>48,500</td></tr> <tr><td>2016</td><td>49,000</td></tr> <tr><td>2017</td><td>49,500</td></tr> <tr><td>2018</td><td>50,000</td></tr> <tr><td>2019</td><td>50,500</td></tr> <tr><td>2020</td><td>51,000</td></tr> <tr><td>2021</td><td>51,500</td></tr> <tr><td>2022</td><td>52,000</td></tr> <tr><td>2023</td><td>52,500</td></tr> <tr><td>2024</td><td>53,000</td></tr> <tr><td>2025</td><td>53,500</td></tr> <tr><td>2026</td><td>54,000</td></tr> </tbody> </table>	Year	Tonnes	2010	46,000	2011	46,500	2012	47,000	2013	47,500	2014	48,000	2015	48,500	2016	49,000	2017	49,500	2018	50,000	2019	50,500	2020	51,000	2021	51,500	2022	52,000	2023	52,500	2024	53,000	2025	53,500	2026	54,000
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MM8	15	para 50	<p>Delete:</p> <p>Charlton Lane, Shepperton'.</p>																																				
MM9	15	Policy AR1 & footnote 26	<p>Delete:</p> <p>'Stanwell Quarry, Stanwell'</p>																																				
MM10	17	para 56	<p>Delete:</p> <p>'important as it is, must be viewed from the point of overall provision and the contribution made over the period to 2026. Their contribution would mainly take place over the period 2011 to 2019. There would only be the potential facility at Salfords Depot post 2019.' replace with 'would make a significant contribution over the period of the plan.'</p>																																				
MM11	17	para 57 line 2	<p>After 'recycling at mineral workings' insert:</p> <p>'and would continue beyond the end of the plan period.'</p>																																				
MM12	17	para 57 line 4	<p>Replace 'a maximum 50,000 tonnes' with:</p> <p>'100,000 tonnes'.</p>																																				
MM13	17	para 57 lines 4 & 5	<p>Delete:</p> <p>'in the light of the limited land availability at the site'.</p>																																				

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MM14	17	para 57 lines 7 - 9	<p>Replace: 'As before, it cannot be assumed that all of the production would come forward. Again it is assumed that 75%, 50% or 25% of the production may come forward.' with:</p> <p>'The operators of two of the sites have indicated their firm intentions to bring forward proposals. The sites are Salfords Depot, Redhill and Penton Hook Marina, Chertsey. The following Chart 5 shows the anticipated production from these two sites.'</p>																												
MM15	17	Chart 5	<p>Replace 'Chart 5: Projections for production from Policy AR1 sites with High, Mid and Low outcomes 2010 - 2026' with:</p> <p>'Chart 5: Projections for production from Policy AR2 sites (excluding Alton Road, Farnham) 2010 - 2026</p> <div style="text-align: center;"> <p>Projections for production from Policy AR2 sites (excluding Alton Road, Farnham) 2010 - 2026</p> <table border="1"> <caption>Data for Chart 5: Projections for production from Policy AR2 sites (excluding Alton Road, Farnham) 2010 - 2026</caption> <thead> <tr> <th>Year</th> <th>Sales, tonnes</th> </tr> </thead> <tbody> <tr><td>2010</td><td>0</td></tr> <tr><td>2013</td><td>150,000</td></tr> <tr><td>2016</td><td>200,000</td></tr> <tr><td>2017</td><td>100,000</td></tr> <tr><td>2018</td><td>100,000</td></tr> <tr><td>2019</td><td>100,000</td></tr> <tr><td>2020</td><td>100,000</td></tr> <tr><td>2021</td><td>100,000</td></tr> <tr><td>2022</td><td>100,000</td></tr> <tr><td>2023</td><td>100,000</td></tr> <tr><td>2024</td><td>100,000</td></tr> <tr><td>2025</td><td>100,000</td></tr> <tr><td>2026</td><td>100,000</td></tr> </tbody> </table> </div>	Year	Sales, tonnes	2010	0	2013	150,000	2016	200,000	2017	100,000	2018	100,000	2019	100,000	2020	100,000	2021	100,000	2022	100,000	2023	100,000	2024	100,000	2025	100,000	2026	100,000
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MM16	21	Policy AR3	<p>Delete: 'Whitehall Farm, Egham' and 'Homers Farm, Bedfont' and 'Watersplash Farm, Halliford'.</p>																												
MM17	21	para 76 line 3	<p>After '2026).' insert: 'The Operator has stated their interest in undertaking aggregate recycling in connection with the Milton Park Farm site. For the remaining sites, '.</p>																												
MM18	22	Chart 7	<p>Replace 'Chart 7' with:</p> <p>'Chart 6: projections for sales from Policy AR3 Milton Park Farm site</p>																												

Ref	Page	Policy/ Para	Main Modification																																																		
			<p>and the remaining Policy AR3 sites with High, Mid and Low outcomes 2010 - 2026</p> <div data-bbox="638 369 1449 1012" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;">Projections of sales from Policy AR3 Milton Park Farm site and the remaining Policy AR3 sites with High, Mid and Low Outcomes 2010 - 2026</p> <table border="1" style="margin-top: 10px;"> <caption>Estimated Sales Data from Chart</caption> <thead> <tr> <th>Year</th> <th>Milton Park Farm</th> <th>High 75%</th> <th>Mid 50%</th> <th>Low 25%</th> </tr> </thead> <tbody> <tr><td>2010</td><td>50,000</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>2012</td><td>50,000</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>2014</td><td>50,000</td><td>35,000</td><td>25,000</td><td>15,000</td></tr> <tr><td>2016</td><td>50,000</td><td>125,000</td><td>100,000</td><td>75,000</td></tr> <tr><td>2018</td><td>50,000</td><td>85,000</td><td>75,000</td><td>65,000</td></tr> <tr><td>2020</td><td>50,000</td><td>50,000</td><td>50,000</td><td>50,000</td></tr> <tr><td>2022</td><td>50,000</td><td>50,000</td><td>50,000</td><td>50,000</td></tr> <tr><td>2024</td><td>50,000</td><td>50,000</td><td>50,000</td><td>50,000</td></tr> <tr><td>2026</td><td>50,000</td><td>50,000</td><td>50,000</td><td>50,000</td></tr> </tbody> </table> </div>	Year	Milton Park Farm	High 75%	Mid 50%	Low 25%	2010	50,000	0	0	0	2012	50,000	0	0	0	2014	50,000	35,000	25,000	15,000	2016	50,000	125,000	100,000	75,000	2018	50,000	85,000	75,000	65,000	2020	50,000	50,000	50,000	50,000	2022	50,000	50,000	50,000	50,000	2024	50,000	50,000	50,000	50,000	2026	50,000	50,000	50,000	50,000
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MM19	22 - 24	paras 78 - 80 Chart 8 Chart 9	<p><i>Replace with:</i></p> <p>'Discussion above has highlighted the uncertainties as to the likelihood of some allocated sites being brought forward to the production stage. As has been referred to, there are three sites where the operators have indicated their firm intentions to bring forward proposals. The sites are Salfords Depot, Redhill, Penton Hook Marina, Chertsey and Milton Park Farm, Egham (referred to as anticipated operator sites). High, Mid and Low outcomes for all the remaining allocated sites have been considered.</p> <p>Taking the same approach as previously for the remainder of the allocated sites where there is uncertainty that sites will come forward and considering the same High, Mid and Low outcomes for these, Chart 8 shows the projected production from the existing permanent and temporary sites and that from in situ recycling. Projected production from the anticipated operator sites is shown. The combined projected production from existing sites and the anticipated operator sites is also shown. The chart shows that production can be reasonably anticipated to be in excess of the 800,000 tpa target until 2022. Sustaining the 800,000 tpa rate beyond 2022 and increasing it to the 2026 rate of 900,000 tpa through development at existing, allocated and / or windfall sites is challenging and will depend partly on the economic conditions towards the end of the plan period.</p> <p>This outcome reflects the findings of the work carried</p>																																																		

Ref	Page	Policy/ Para	Main Modification
			<p>out to provide a sub-regional apportionment for the provision of recycled and secondary aggregates in the South East. This recognised that authorities with a significant proportion of land designated Green Belt might not be able to implement their full apportionment through site allocations in the development plan documents. Having tested the extent to which this applies in Surrey, it is apparent that this may be the case depending on the number of allocated and windfall sites that come forward.</p> <p>Chart 8: Projections of production from all sites with High, Mid and Low outcomes 2010 – 2026 with projection of production from existing and operator interest sites.</p> <p><i>* For Chart 8 see below</i></p>
MM20	29	Table 3	<p><i>Insert new Implementation of Policy AR1:</i></p> <p><i>** For Table 3 see below</i></p>
MM21	31	Table 4	<p><i>Insert new monitoring framework of Policy AR1:</i></p> <p><i>** For table 4 see below</i></p>
MM22	40 & 41		<p><i>Delete all</i></p>
MM23		Proposals Map	<p><i>Delete the preferred areas:</i></p> <p>4 - Stanwell Quarry; E - Whitehall Farm; G - Homers Farm; L - Watersplash Farm and 5 - Charlton Lane.</p>

*** Chart 8**



**** Table 3**

Implementation of Policy AR1	
Relevant SMP Core Strategy objectives	O1.1, O1.2, O1.3
National Planning Policy Framework	Paragraphs 14, 15, 17, 143, 151
Regional policies	W5, W6, W17, M2
Key outcomes	Grant of planning permission on preferred and windfall sites for aggregate recycling facilities
Key agencies	Mineral/Waste planning authority, mineral and waste operators, land owners/developers

*****Table 4
Monitoring framework of Policy AR1**

Policy reference	Nature of target	Type of Indicator	Indicator	Data source	Prompts for consideration of remedial action
AR1 Presumption in favour of sustainable development	Approving proposals for aggregates recycling that are sustainable and without delay	Process Contextual Output	Preparation of <i>Aggregates Recycling DPD</i> in accordance with adopted MWDS. Approval of proposals for aggregates recycling facilities that are sustainable and which increase aggregate recycling production with milestones of 0.8 mtpa by 2016 and 0.9 mtpa by 2026. Proposals for aggregates recycling facilities granted planning permission and the period of time for determination of such proposals.	Surrey CC	Failure to approve proposals for aggregates recycling that are sustainable. Failure to determine without delay proposals for aggregates recycling facilities that accord with the policies of the Plan. Approval of proposals for aggregates recycling facilities where there are no policies relevant or relevant policies are out of date and where material considerations indicate otherwise.