

**TO:** PLANNING & REGULATORY COMMITTEE **DATE:** 3 August 2016  
**BY:** PLANNING DEVELOPMENT TEAM MANAGER  
**DISTRICT(S)** SPELTHORNE BOROUGH COUNCIL **ELECTORAL DIVISION(S):**  
**Laleham & Shepperton**  
**Mr Walsh**  
**Staines South & Ashford West**  
**Ms Turner-Stewart**  
**Ashford**  
**Mrs Coleman**  
**PURPOSE:** FOR DECISION **GRID REF:** 505414 169922

**TITLE: MINERALS/WASTE SP12/01132/SCD2**

## SUMMARY REPORT

### **Manor Farm, Ashford Road and land west of Queen Mary Reservoir, Laleham, Surrey**

Details of archaeology submitted pursuant to Condition 35 of planning permission ref: SP/2012/01132 dated 23 October 2015.

The Manor Farm and Queen Mary Quarry (QMQ) (land west of Queen Mary Reservoir) site, some 43.9 hectares (ha) in total, is in two parts. It comprises land at Manor Farm (some 33.4 ha), situated to the east of Staines Road (B376) and Worple Road and west of Ashford Road (B377), Laleham; and land at Queen Mary Quarry (QMQ) (including part of the existing lake and existing processing plant site) to the east of Ashford Road and west of Queen Mary Reservoir, Laleham, Staines upon Thames.

Planning permission ref SP2012/01132 was granted subject to planning conditions in October 2015 for the extraction of sand and gravel from land at Manor Farm, construction of a tunnel under the Ashford Road and a causeway across the lake at QMQ for the conveyor belt system, transport of the extracted mineral by conveyor to QMQ for processing in the existing processing plant, erection of a concrete batching plant and an aggregate bagging plant within the QMQ aggregate processing and stockpiling areas, restoration of the land at Manor Farm to landscaped lakes and a nature conservation afteruse. Some conditions require the submission and approval of more details on a range of matters; to date eight submissions have been made.

The area in which the application site at Manor Farm and QMQ is situated is rich in archaeological and cultural heritage terms. This report deals with the details of a written scheme of investigation (WSI) for the implementation of a programme of archaeological work submitted to comply with the requirements of Condition 35. The WSI is required to set out how the further archaeological work detailed in the Environmental Statement for the development permitted under ref SP2012/01132 would be carried out.

The programme in the WSI includes for: the phased archaeological strip, map and record investigative fieldwork; post archaeological excavation/fieldwork assessment work and reporting; further post excavation analysis and assessment and final reporting arising out of the field work; and archiving. In determining the application it is necessary to be satisfied that the proposals are acceptable from an archaeological point of view and provide for the necessary programme of archaeological work to mitigate the impact on the archaeological interest and resource in the site.

Objections have been raised by local residents relating to the process for the archaeological investigation (who does the work and funds it), monitoring of the work and quality control, and arrangements for publication and reporting of the findings. All are matters addressed in the WSI.

The County Archaeological Officer and Spelthorne Borough Council both consider the submitted scheme to be acceptable and raise no objection to the details of the WSI being approved. Officers consider the submission meets the required professional standards and is acceptable and complies with the relevant policy in the National Planning Policy Framework (NPPF) and relevant development plan policies, such that the details submitted pursuant to Condition 35 can be approved

The recommendation is to **APPROVE** the submitted details.

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## APPLICATION DETAILS

### ***Applicant***

Brett Aggregates Ltd

### ***Date application valid***

6 April 2016

### ***Period for Determination***

1 June 2016

### ***Amending Documents***

Email dated 2 June 2016 from Agent (Mike Davies, Davies Planning).

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## SUMMARY OF PLANNING ISSUES

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

	<b>Is this aspect of the proposal in accordance with the development plan?</b>	<b>Paragraphs in the report where this has been discussed</b>
Archaeology	Yes	23-31

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## ILLUSTRATIVE MATERIAL

### **Site Plan**

Plan 1- Location Plan

Plan 2 - Extraction phases, site compound, conveyor tunnel and causeway (annotated applicant SP2012/01132 drawing no. EIA9.8 Rev B March 2012)

### **Aerial Photographs**

Aerial 1

Aerial 2

### **Site Photographs**

None

## BACKGROUND

### *Site Description*

- 1 The Manor Farm and Queen Mary Quarry (QMQ) (land west of Queen Mary Reservoir) site, some 43.9 hectares (ha) in total, is in two parts. It comprises land at Manor Farm (some 33.4 ha), situated to the east of Staines Road (B376) and Worple Road, and west of Ashford Road (B377), Laleham; and land at Queen Mary Quarry (QMQ) (including part of the lake and existing processing plant site) to the east of Ashford Road and west of Queen Mary Reservoir, Laleham, Staines upon Thames.

### *Planning History*

- 2 Planning permission ref SP2012/01132 was granted subject to 48 planning conditions on 23 October 2015 for:

*“Extraction of sand and gravel and restoration to landscaped lakes for nature conservation after-use at Manor Farm, Laleham and provision of a dedicated area on land at Manor Farm adjacent to Buckland School for nature conservation study; processing of the sand and gravel in the existing Queen Mary Quarry (QMQ) processing plant and retention of the processing plant for the duration of operations; erection of a concrete batching plant and an aggregate bagging plant within the existing QMQ aggregate processing and stockpiling areas; installation of a field conveyor for the transportation of mineral and use for the transportation of mineral from Manor Farm to the QMQ processing plant; and construction of a tunnel beneath the Ashford Road to accommodate a conveyor link between Manor Farm and QMQ for the transportation of mineral.”*

- 3 The permission is subject to s106 legal agreement (dated 14 October 2015) relating to long term aftercare management, (including bird management) of the land at Manor Farm and to limit the number of HGV movements in combination with planning permission refs SP07/1273 and SP07/1275 at the QMQ site to no more than 300 HGV movements (150 two way HGV movements) on any working day.
- 4 The Environmental Statement (ES) for the SP2012/01132 development assessed the potential impact of the proposed development on archaeology and cultural heritage interests at the site and surrounding area. The assessment established that there was a moderate to high potential for the land within the Manor Farm part of the site to contain archaeological remains and further investigative field work identified a high density of archaeological features and deposits, evidence for settlement activity, dating from the early Neolithic and Middle Bronze Age onwards. (The land within the QMQ part of the application site was not included in the further investigative field work as the land had been previously disturbed by mineral working and processing activity, so destroyed in archaeological terms and excluded from the need for further assessment.)
- 5 The ES concluded the proposed extraction had the potential to impact on buried archaeological remains and required mitigation which would need to be agreed with the Surrey County Council Archaeological Officer. The County Archaeological Officer concluded a programme of archaeological work, secured by planning condition, would be appropriate mitigation. This should comprise a strip, map and sample exercise (encompassing an archaeologically controlled strip with contingent excavation and recording of any assets present) which would preserve by record and advance the understanding of the significance of any heritage asset that would be lost as a result of the development. This led to imposition of condition 35.

- 6 As well as this application seven other applications, listed below, have been made seeking approval of details pursuant to conditions on a range of matters (some applications deal with more than one planning condition).

Application reference	Proposal
SP12/01132/SCD1	Details of noise barriers for the conveyor switch points submitted pursuant to Conditions 22 and a Bird Hazard Management Plan submitted pursuant to Condition 36 of planning permission ref: SP2012/01132 dated 23 October 2015.
SP12/01132/SCD3	Details of Dust Action Plan and dust monitoring programme submitted pursuant to Condition 24(a) of planning permission reference SP2012/01132 dated 23 October 2015.
SP12/01132/SCD4	Details of a scheme to ensure that the causeway does not form a barrier on the flood plain submitted pursuant to Condition 28 of planning permission reference SP2012/01132 dated 23 October 2015.
SP12/01132/SCD5	Details of measures to be taken and facilities to be provided to keep the public highway clean and prevent creation of a dangerous surface submitted pursuant to Condition 12(a), a Construction Management Plan submitted pursuant to Condition 15 and an updated bat survey and biodiversity mitigation strategy submitted pursuant to Condition 38 of planning permission reference SP2012/01132 dated 23 October 2015.
SP12/01132/SCD6	Details of the current and proposed design of the Worple Road access; tree and hedgerow removal, protection measures and replanting submitted pursuant to Condition 8(b)(i) of planning permission reference SP/2012/01132 dated 23 October 2015.
SP12/01132/SCD7	Details of a Groundwater Monitoring Plan submitted pursuant to Condition 32 of planning permission ref: SP2012/01132 dated 23/10/2015.
SP12/01132/SCD8	Details of the design of the temporary Ashford Road access submitted pursuant to Condition 8 (a) and vegetation survey and tree and hedgerow protection plan submitted pursuant to Condition 47 of planning permission ref: SP2012/01132 dated 23 October 2015.

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## THE PROPOSAL

- 7 Condition 35 of the SP2012/01132 planning permission and the reason for the condition read as follows:

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

*Reason: To afford the County Planning Authority a reasonable opportunity to examine any remains of archaeological interest which are unearthed and decide upon a course of action required for the preservation or recording of such remains in accordance with the Policy MC14 of the Surrey Minerals Plan 2011.*

- 8 The submitted Written Scheme of Investigation (WSI) produced by the applicant's archaeological contractor, AOC Archaeology Group, sets out the methodology for an archaeological strip, map and record (and post archaeological excavation assessment work) investigation of the land with planning permission at Manor Farm. The scope of the works for the WSI had been agreed with the County Archaeological Officer. The investigation would be carried out on all areas to be excavated and other land which would experience disturbance as part of the development. This would include areas for construction of soil bunds stockpiling, site entrances and access roads, the conveyor route etc which have the potential to impact on archaeological assets.
- 9 The submission states that the work will conform to current best archaeological practice and local and national standards and guidelines. The archaeological investigation would be undertaken by a team of professional archaeologists and the site works monitored by a member of the Surrey County Council Heritage Conservation Team. Any significant variations to the methodology proposed in the WSI will be discussed and agreed in advance with the County Archaeological Officer. Implementation of the archaeological programme of works would be paid for by the applicant, Brett Aggregates Limited.
- 10 The WSI details how the phased fieldwork investigation of the site would be undertaken recorded and reported on. On completion of field work and assessment of each phase interim reports will be provided, and within six months of the completion of all the field work on site the results will be presented in a post excavation assessment report.
- 11 The post excavation assessment report will contain an updated post excavation project design for work to be carried out in the analysis stage arising out of the field work and post excavation assessment defining the objectives of the analysis phase, strategies and resources necessary to achieve them. Included will be a detailed methodology, format and timescale for a full report on the work, to be agreed with the applicant and Surrey County Council Heritage Conservation Team Archaeological Officer and made available for publication in a publicly available journal within two years of the completion of any fieldwork. This latter requirement relating to the full report and publication was an amendment to the submitted scheme added at the request of the County Archaeological Officer.
- 12 The final section of the WSI outlines how the site archive which will comprise all excavated material (artefacts, environmental samples) and written and drawn records will be consolidated, collated and ordered so they can be archived as a permanent record. Arrangements for depositing the archive in a local museum will be discussed with the landowner/developer and the museum. If the archive is deposited in a local receiving museum it will be deposited within one year of the completion of the fieldwork (if no further work is required) after which would become publically available.

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## **CONSULTATIONS AND PUBLICITY**

### ***District Council***

- 13 Spelthorne Borough Council: No objection.

### ***Consultees (Statutory and Non-Statutory)***

- 14 County Archaeological Officer: No objection.

### ***Parish/Town Council and Amenity Groups***

- 15 Clag2: No views received.

- 16 Laleham Residents' Association: No views received.
- 17 Manor Farm Residents Association: No views received.
- 18 Spelthorne Natural History Society: No views received.

**Summary of publicity undertaken and key issues raised by public**

- 19 The application was publicised by the posting of nine site notices and a total of 281 of people who had made comments on the SP2012/01132 planning application were directly notified by letter. To date written representations have been received from 15 members of the public objecting to the application.
- 20 Issues raised relevant to the submission are queries about the process for archaeological investigation, who will undertake and fund the investigation, the monitoring and quality control over the work and arrangements for publication and reporting of the findings.
- 21 None of the other points raised are considered to be relevant to and impact on the County Planning Authority's determination of this application. The other points raised object to the development permitted under ref SP2012/01132 and potential impact including in terms of traffic, noise, dust/air quality, flood risk, impact on wildlife and visual impact. These were all assessed and considered in the officer report to the 2 September 2015 Planning and Regulatory Committee (Item 7) at which the committee resolved to grant planning permission subject to conditions.

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**PLANNING CONSIDERATIONS**

- 22 The guidance on the determination of planning applications contained in the Preamble/Agenda front sheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs.
- 23 In this case the statutory development plan for consideration of the application consists of the Surrey Minerals Local Plan 2011 (comprised of the Core Strategy and Primary Aggregates Development Plan Documents (DPD) and Spelthorne Borough council Spelthorne Borough Local Plan 2001 Saved Policies And Proposals as at 28 September 2007 (SBLP 2001); and Spelthorne Borough Core Strategy and Policies Development Plan Document February 2009 (SBCS&P DPD 2009).
- 24 The application has been submitted to comply with the requirements of Condition 35 which was imposed to meet the requirements of the County Archaeological Officer to ensure that a Written Scheme of Investigation was submitted setting out how the further archaeological work detailed in the Environmental Statement would be carried out. In considering the application the acceptability of the proposal will be assessed against relevant development plan policies and material considerations.

**ARCHAEOLOGY**

**Surrey Minerals Plan 2011 Core Strategy and Primary Aggregates Development Plan Documents (DPD) (SMP 2011)**

*SMP 2011 Core Strategy DPD*

Policy MC14 Reducing the adverse impacts of mineral development

*SMP 2011 Primary Aggregates DPD*

Policy MA2 Preferred areas for concreting supply (Preferred area J: Land at Manor Farm)

**Spelthorne Borough Core Strategy and Policies Development Plan Document February 2009 (SB Core Strategy and Policies DPD 2009)**

Strategic Policy SP6 Maintaining and Improving the Environment

**Spelthorne Borough Local Plan 2001 (saved policies) (SBLP 2011)**

Policy BE 24 Archaeology, Ancient Monuments and Historic Landscapes

- 25 The area in which the application site at Manor Farm and QMQ is situated is rich in archaeological and cultural heritage terms. In determining the application it is necessary to be satisfied that the proposals are acceptable from an archaeological point of view and provide for the necessary programme of archaeological work to mitigate the impact on the archaeological interest and resource in the site.
- 26 One of the core land-use planning principles in the National Planning Policy Framework (NPPF) to underpin planning decisions is to “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*”. National policy on conserving and enhancing the historic environment, including archaeology is set out set out within part 12 (paragraphs 126 to 141) of the NPPF<sup>1</sup>, including information and assessment requirements, and matters local planning authorities should take account of in determining planning applications, with further guidance provided in the National Planning Policy Guidance (nPPG).
- 27 Surrey Minerals Plan 2011 Policy MC14 requires the impacts in relation to the historic landscape, sites or structure of architectural and historic interest and their settings, and sites of existing or potential archaeological interest or their settings to be considered. The policy requires sufficient information and assessment to be submitted on the loss or damage to archaeological resources such that appropriate mitigation measures can be identified so as to minimise or avoid any material adverse impact and compensate for loss. Key development requirements for the Manor Farm preferred area<sup>2</sup> require proposals to demonstrate no unacceptable impacts on the character and setting of Laleham Conservation Area and prior archaeological assessment and evaluation as the site is within an area of high archaeological potential.
- 28 Spelthorne Borough Core Strategy and Policies Development Plan Document February 2009 Strategic Policy SP6 Maintaining and Improving the Environment seeks to preserve and protect the borough’s cultural heritage and architectural and historic heritage including historic buildings and Conservation Areas. Spelthorne Borough Council Local Plan 2001 Policy BE25 states that for development proposals in areas of high archaeological potential a field evaluation should be carried out where an initial assessment has shown that important archaeological remains may exist, and that conditions should be imposed to ensure that damage to any remains is minimal or avoided.
- 29 The County Archaeological Officer has reviewed the submitted WSI, as amended (see paragraph 12 above) and considers the WSI meets the required professional standards and is acceptable. The County Archaeological Officer has also commented that the work detailed in the WSI forms the first stage of the required archaeological programme.
- 30 As such, the condition will need to be maintained and will not be finally discharged until all the fieldwork has been completed and a satisfactory final report on its results has been submitted and approved, or (should significant/ complex archaeological deposits have been revealed) when a satisfactory post-excavation assessment detailing the post-fieldwork analyses needed to arrive at a final publishable report have been agreed and adequately resourced by the applicant. Spelthorne Borough Council considers the submitted scheme to be acceptable and raise no objection to the details being approved.

<sup>1</sup> [Part 12 NPPF \(paragraphs 126 to 141\)](#)

<sup>2</sup> SMP 2011 Primary Aggregates DPD Policy MA2 Preferred areas for concreting supply ([Preferred Area J - Manor Farm](#))

- 31 Issues raised by objectors relating to monitoring of the work and reporting arrangements (see paragraph 20 above) are provided for in the submission. The work specified is the responsibility of the operator to commission and undertake. Site works would be monitored by a member of the Surrey County Council Heritage Conservation Team. Officers are satisfied that the proposals deal adequately with the objectors concerns about quality, publication and reporting of findings. Failure to comply with the condition and implement the approved WSI and archaeological programme of work would mean a breach of Condition 35. Should this arise it is a matter that could be investigated and pursued by the Surrey County Council Planning Enforcement Team.

## HUMAN RIGHTS IMPLICATIONS

- 32 The Human Rights Act Guidance for Interpretation, found at the end of this report, is expressly incorporated into this report and must be read in conjunction with the following paragraph.
- 33 The proposal involves the approval of details of a WSI pursuant to Condition 35 of planning permission ref: SP2012/01132 dated 23 October 2015. It is the Officer's view that the matter covered by the submission and implementation of the archaeological programme of works will not give rise to any potential impacts and therefore would not engage Article 8 or Article 1 of Protocol 1. As such, these details are not considered to interfere with any Convention right.

## CONCLUSION

- 34 The applicant has submitted a WSI which is acceptable and complies with the relevant policy in the NPPF and relevant development plan policies as listed above such that the details submitted pursuant to Condition 35 can be approved.

## RECOMMENDATION

The recommendation is that the details of archaeology pursuant to Condition 35 of planning permission ref: SP/2012/01132 dated 23 October 2015 contained in application ref. SP12/01132/SCD2 **be APPROVED.**

## CONTACT

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## BACKGROUND PAPERS

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

### Government Guidance

[National Planning Policy Framework 2012](#)

[Planning Practice Guidance](#)

### The Development Plan

[Surrey Minerals Plan Core Strategy Development Plan Document \(DPD\) 2011](#)

[Surrey Minerals Plan 2011 Primary Aggregates DPD](#)

[Spelthorne Borough Council Core Strategy and Policies DPD February 2009](#)

### Other documents

- The deposited application documents and plans and Environmental Statement including those amending or clarifying the proposal, responses to consultations and representations received on the application included in the application file for application ref SP2012/01132.



- The officer report and annexes to the 2 September 2015 Planning and Regulatory Committee (Item 7) for application ref SP2012/01132 ([2 September 2015 Planning and Regulatory Committee Agenda](#))

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