

**TO:** PLANNING & REGULATORY COMMITTEE **DATE:** 13 December 2017

**BY:** PLANNING DEVELOPMENT TEAM MANAGER

**DISTRICT(S)** GUILDFORD BOROUGH COUNCIL **ELECTORAL DIVISION(S):** Worplesdon Mr Keith Witham

**PURPOSE:** FOR DECISION **GRID REF:** 494246 153441

**TITLE:** MINERALS/WASTE GU17/P/01585

### SUMMARY REPORT

**Cobbett Hill Earth Station, Cobbett Hill Road, Normandy, Guildford, Surrey GU3 2AA**

**Change of use to waste paper and waste cardboard recovery and transfer facility; overnight HGV parking.**

Cobbett Hill Earth Station (Normandy Business Park) is an active industrial site and is not a waste site identified in the Surrey Waste Plan 2008 (SWP 2008). It lies within the Metropolitan Green Belt and the Site of Scientific Interest (SSSI) Impact Risk Zone. The site is surrounded to the north, north-west and south-east by the Thames Basin Heaths Special Protection Area (SPA), Cobbett Hill Common Special Area of Conservation (SAC) and the Ash to Brookwood Heaths SSSI. The Clasford Bridge Road Site of Nature Conservation Importance (SNCI) is located approximately 160 metres south east of the application site. The application site is within the Cobbett Hill Earth Station, which is a business and technology park.

The planning application is for the proposed development of a waste paper and waste cardboard recovery and transfer facility with overnight HGVs parking for the sorting and bailing treatment of approximately 15,000 tonnes of waste paper and waste cardboard per year, which intends to replace the previous facility at West Horsley Place Estate. Pirbright Parish Council, Worplesdon Parish Council, Ash Parish Council, Friends of Normandy Wildlife and 66 letters of representation all object and raise various concerns with this application, in respect of: planning policy, natural environment, pollution, traffic and Green Belt.

Given that the site is within the Green Belt and is immediately adjacent to the sensitive natural protection areas, Officers consider that a condition should be imposed to restrict the future use of permitted development rights and to secure that the County Planning Authority has adequate control on the proposed development and to minimise its impact on the amenities in accordance with both national and local development policies. Officers consider following advice from technical consultees and

subject to the imposition of conditions, the proposed facility would not result in unacceptable impacts on the amenity. Officers also consider that the applicant has provided sufficient information to demonstrate that very special circumstances exist clearly that outweigh the harm to the Green Belt, which include: the lack of suitable alternative non-Green Belt sites by undertaking an alternative site assessment; the characteristics of the application site; need to be located within the catchment area to enhance a sustainable waste management practice and the wider environmental and economic benefits of the sustainable waste management in accordance with the Waste Hierarchy.

**The recommendation is to PERMIT subject to conditions.**

---

## **APPLICATION DETAILS**

### ***Applicant***

TGM Environmental

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

7 July 2017

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

22 December 2017

### ***Amending Documents***

- Email dated 04 October 2017 with the letter dated 04 October 2017 regarding the further details on ecology, the drawing no: LAY/01 (Rev. A) 'Site Layout' dated 20 September 2017 and the letter dated 10 March 2017 regarding the West Horsley Place Estate
- Email dated 05 October 2017 with the letter dated 05 October 2016 regarding the comments of the County Transport Consultant and the drawing no: 160524-TK13 (Rev. B) 'Swept Path Analysis 16.2m Drawbar Truck'
- Email dated 17 October 2017 regarding the addition information on the proposed operating hours at the Cobbett Hill Earth Station
- Email dated 25 October 2017 with the Noise Assessment dated October 2017
- Email dated 14 November 2017 with letter dated 14 November 2017 entitled 'Response to comments received from Surrey County Council dated 3 November 2017' (Ref: A0099676)

---

## **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>
Waste Management Issues	Yes	37 – 55
Environment and Amenity	Yes	56 – 108

Traffic and Highways	Yes	109 – 120
Metropolitan Green Belt	No	121 – 142

---

## ILLUSTRATIVE MATERIAL

### Site Plan

Drawing Ref. LOC/01 Site Location dated 10 March 2017  
Drawing Ref. APP/01 Application Boundary dated 10 March 2017  
Drawing Ref. LAY/01 (Rev. A) Site Layout dated 20 September 2017

### Aerial Photographs

Aerial 1        Cobbett Hill Earth Station  
Aerial 2        Cobbett Hill Earth Station

### Site Photographs

Figure 1        Main entrance of the Cobbett Hill Earth Station  
Figure 2        Existing fencing and site entrance  
Figure 3        Northern boundary of the application site  
Figure 4        Southern eastern boundary of the application site  
Figure 5        Western boundary of the application site  
Figure 6        Applicant's HGV

---

## BACKGROUND

### *Site Description*

1. Cobbett Hill Earth Station (Normandy Business Park) is located approximately 6 kilometres (km) north west of Guildford and approximately 2.3km north east of Normandy. Access into the business park is gained from Cobbett Hill Road, which joins the A324 to the north and the A323 to the south. It lies within the Metropolitan Green Belt and the Site of Scientific Interest (SSSI) Impact Risk Zone.
2. Cobbett Hill Earth Station is surrounded to the north, north-west and south-east by the Thames Basin Heaths Special Protection Area (SPA), Cobbett Hill Common Special Area of Conservation (SAC) and the Ash to Brookwood Heaths Special Site of Scientific Interest (SSSI). The Clasford Bridge Road Site of Nature Conservation Importance (SNCI) is located approximately 160 metres south east of the Cobbett Hill Earth Station.
3. The application site lies within the north western part of the Cobbett Hill Earth Station, which is approximately 0.42 hectares in size and it is currently used for the storage of various vehicles and machinery.

### *Planning History*

4. There is no recent case history with regards to minerals and waste development for the Cobbett Hill Earth Station.

5. In May 2003, a Certificate of Lawfulness to establish the existing uses and buildings in order that the site may continue to be used for offices, research and light industrial (B1 use class) with ancillary storage (B8 use class) was granted by the Guildford Borough Council.
6. In July 2007, a planning application (Ref. GU07/1029) for the retention and redesign of existing bunds adjacent to Cobbett Hill Road was refused by the Surrey County Council.
7. The most recent being a planning permission (Ref. 15/P/00183) granted by the Guildford Borough Council in September 2015 was the extension to Building A and redevelopment of the remainder of the site to provide a business/technology park.

## THE PROPOSAL

8. The applicant is seeking permission for the proposed development of a waste paper and waste cardboard recovery and transfer facility including overnight HGVs parking, which intends to replace the previous facility at West Horsley Place Estate. The proposed development will be laid entirely to concrete. The new surfacing will also allow for the installation of a site drainage system. The 3 metres in height steel palisade / chain link perimeter boundary fencing will be fitted with a screening mesh. The existing fencing at the eastern part of the site will be reconstructed along the eastern boundary of the site. The proposed development will include the following:
  - A weighbridge
  - A Portakabin site office approximately 6.1 metres x 3.2 metres x 2.4 metres
  - A waste reception area
  - An operation area including a baling plant and conveyor
  - A storage bay for bales
  - 10 No. lighting units
  - Staff parking area
  - Parking area for lorries
9. The proposed waste paper and waste cardboard recovery and transfer facility will process approximately 275-300 tonnes per week of waste paper (10,000 tonnes per annum) and waste cardboard (5,000 tonnes per annum), which equates to approximately 15,000 tonnes per annum.

### Hours of Operation

10. The applicant initially proposed that the facility would operate between the hours 0600 to 1800 Monday to Saturday and no operations on Sundays, Bank Holidays and Public Holidays. Following the comments from Officers, statutory and non-statutory consultees, the applicant agreed to revise the hours and proposed the following:

Monday to Friday	:	0600-1800
Saturday	:	0700-1300

Sunday, Bank Holidays and Public Holidays : No operations

- No use of plant and machinery on site and deliveries are allowed between the hours 0600 to 0700 and 1730 to 1800 Monday to Friday
- 4 vehicles from the site for collecting purposes only may depart the site between the hours 0600 and 0700 Monday to Saturday

**Vehicle Routing**

11. The applicant states that the anticipated heavy goods vehicle (HGV) movement is approximately 174 movements per week, which is based on the operational experience from the former facility at West Horsley. The applicant states that vehicles over 7.5 tonnes will depart from and arrive at the site along Cobbett Hill Road from the north **only** via the A324 to the north instead of the A323 to the south.

**CONSULTATIONS AND PUBLICITY**

***District Council***

12. Guildford Borough Council

No objection and make the following comments:

- As the site is located within the Green Belt and the proposal is considered as an inappropriate form of development. The proposal should not be approved except in very special circumstances.
- Views of Natural England should be sought as the site is surrounded by the Thames Basin Heaths SPA and the Ash to Brookwood Heaths SSSI.
- Views of the County Highway Authority should be sought due to the constrained nature of Cobbett Hill Road and the surrounding road network.

13. Environmental Health Officer

- No objection and make the recommendations on the operating hours.

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

14. County Landscape Architect

No objection.

15. County Lighting Consultant

No objection.

16. County Air Quality Consultant

No objection.

17. SuDS & Consenting Team

No objection subject to conditions.

18. Environment Agency

No comments to make.

19. County Ecologist  
No objection subject to conditions.
20. County Noise Consultant  
Not satisfied with the submitted noise assessment.
21. County Highway Authority  
No objection subject to conditions.
22. Natural England  
No objection subject to mitigation being secured by conditions.
23. Thames Water  
No comments received.
24. Central Licensing Office  
The applicant has a valid licence subject to conditions.
25. Surrey Wildlife Trust  
No objection and make the following comments:
- As the proposed development is immediately adjacent important designated habitat, part of the Thames Basin Heaths SPA, Thursley Ash, Pirbright and Chobham Commons SAC and Ash to Brookwood Heaths SSSI, the Trust would advise the County Planning Authority to consult with the Natural England for such designated habitat.
  - Sufficient robust mechanisms should be in place to prevent pollution and disturbance of the habitats and the import species. Issues of concern include pollution from water flow off the site, contaminated liquid spill, fuel spill, dust, fumes, noise, light, rubbish, additional vehicle movements and disturbance from human and vehicular activity.
  - A Construction and Environmental Management Plan for the development process should be approved
  - A regular monitoring scheme should be put in place to monitor the effectiveness of pollution and disturbance control mechanisms and have the ability to enforce corrective measures.

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

26. Normandy Parish Council  
No comments received.
27. Pirbright Parish Council  
Object to the proposal and make the following comments:
- Unsuitable location of the site. The site should be located in Guildford or established industrial area.
  - Concerns regarding the windblown litter on the adjoining heathland.

***Green Belt***

- The development is considered to be inappropriate in the Green Belt, which is contrary to national and local policy.
- The development also harms the openness and increase the impact on the Green Belt as it involves further urbanisation of the

site, including a large area of new concrete hardstanding, 3 metres high palisade fencing, a new plant and buildings.

- No very special circumstances have been shown to justify inappropriate development in the Green Belt.
- Concerns regarding the alternative site assessment

#### *Traffic*

- The site access onto the Cobbett Hill has a HGV restriction and is not suitable to have additional HGV traffic
- HGV traffic will increase the traffic pressure in Pirbright
- Danger to other road users, such as cyclists and horse riders
- Unenforceable issues on the proposed use of a HGV routing agreement
- The proposed weekly 260 vehicle movement will cause significant additional noise and disturbance in Pirbright and Fox Corner
- Incorrect assumptions are made in the Transport Assessment, including the HGV component of traffic is not identified as a percentage of traffic on Cobbett Hill

#### 28. Worplesdon Parish Council

Object to the proposal and make the following comments:

- The proposed development is inappropriate within the Green Belt and it does not comply with any of the exceptions within the NPPF and is contrary to the Design Statement.
- Parking bays for staff and visitors should be clearly laid out and in 5 metres x 2.5 metres.
- Concern regarding the traffic counts, the forecast trips generated from the site and also the calculation method of the trips.
- The submitted swept path analysis is not clear from the diagram whether or not the egress is shown.
- Cycle parking should be in a secure, sheltered and accessible location close to the entrance to the site office.
- A construction method statement is required.
- If planning permission is granted, the following conditions should be imposed, including the restriction of all HGVs to access via A324; deliveries should be made weekdays from 0800 to 1700 only to protect the amenities of local residents.

#### 29. Ash Parish Council

Object to the proposed development and make the following comments:

- The proposed use with its generation of noise, dust and fumes will be detrimental to other current and potential non-waste uses at the Normandy business Park and to the wider environment.
- The proposed site is within the sensitive countryside location, including the Green Belt and abuts the SPA, SAC, SSSI designated area and ancient woodland immediately to the south.
- The very special circumstances case has not been sufficiently demonstrated.
- The site is poorly related to the main road network.
- Cobbett Hill is a country lane with no pavements and no street lighting and the crossroads at Pirbright Road is unsuited to HGVs having to turn out into fast moving traffic.

- A condition should be imposed to require signage at the exit prohibiting HGVs from using the southern part of the Cobbett Hill Road as no physical measures are proposed to reinforce the proposed commitment.
- The proposed lighting will be detrimental to the countryside location and in an area of such darkness be visible for a considerable distance with an urbanising impact.

Remains objection to the proposal after considering the further information submitted and makes the following comments:

- Vehicles of up to 7.5 tonnes using the A323 Aldershot Road have an impact on the schools

### 30. Friends of Normandy Wildlife

Object to the proposal and make the following comments:

- The twelve hours of noise pollution from 6am to 6pm will affect the neighbouring land and have an impact on the '*noise resistant birds*', such as Dartford Warbler, Nightjar, Tree Pipit, Woodlark, etc.
- Light pollution causes disorientation and changes to feeding patterns of animals.
- Paper litter, particularly on very windy days, would disturb birds as the site is near the top of a hill.

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

31. The application was publicised by the posting of 2 site notices and an advert was placed in the local newspaper. A total of 10 of owner/occupiers of neighbouring properties were directly notified by letter. 66 letters of representation have been received, all letters object to the development. These letters raise the following comments:

#### *Planning Policy*

- Not in line with both national and local planning policy
- Not a designated waste site at the Surrey Waste Plan 2008
- A recycling station is already located within half a mile (John Gunner)

#### *Natural Environment*

- Threat to the natural environment
- Threat to the Thames Basin Heaths SPA / SSSI
- Threat to the rare species of birds, such as Dartford warbler, Nightjar and Woodlark
- Habitat Regulations Assessment should be conducted by an impartial company
- Increase in fire risk

#### *Green Belt*

- Inappropriate within the Green Belt

#### *Pollution*

- Lighting
- Noise
- Groundwater



- Chemical
- Visual
- Litter / wind-blown litter on the adjoining heathland

#### *Traffic*

- Cobbett Hill Road is too narrow / in a poor condition / imposes a weight restriction
- Turning from Cobbett Hill Road to A324 Aldershot Road is dangerous
- Air pollutants from the HGVs
- Threat to the cyclists
- Threat to the horse riders
- Threat to the Army Cadets
- Threat to the pedestrians as there are no pavements along the Cobbett Hill Road
- Threat to the surrounding village settlements (i.e. Pirbright, Normandy and Ash)
- Threat to the Bullswater Bridge
- Ash Road is unsuitable
- Impossible for HGVs to have a 90 degree bend at Fox Corner
- Increase in lorries at the A323 / A324 Aldershot Road
- Incorrect assumptions on the submitted Transport Assessment
- Enforcement concerns in controlling lorries to turn right towards A324 out of the Station

#### *Consultation*

- Natural England has never been consulted (Officers comment that Natural England has been consulted in this application)

---

## **PLANNING CONSIDERATIONS**

### **Introduction**

32. The guidance on the determination of planning applications contained in the Preamble/Agenda frontsheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs.
33. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations. In this case the statutory development plan for consideration of the application consists of the Surrey Waste Plan 2008, Guildford Borough Local Plan 2003 and Guildford Borough Submission Local Plan: strategy and sites December 2017.
34. Guildford Borough Council is now preparing a new Local Plan, to be known as Guildford Borough Submission Local Plan: strategy and sites December 2017 (GBLP 2017) and it will eventually replace the current Guildford Borough Local Plan 2003 as the principal guide to future development in Guildford up until 2034. The consultation closed on 24 July 2017 and Guildford Borough Council is now collating and analysing all the comments received and producing a Consultation Statement, which will be passed on to the Secretary of State for examination by an independent Planning Inspector. Officers consider that this local plan carries some weight in the consideration of this planning application.

35. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. In this case the main planning considerations are: Waste Management Issues, Environment and Amenity, Traffic and Highways and Green Belt.

### **EIA Screening**

36. The proposed development was evaluated by the County Planning Authority in line with the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 and the advice set out in the National Planning Practice Guidance on Environmental Impact Assessment (EIA). On 16 May 2017 the County Planning Authority adopted a screening opinion under Regulation 7 of the above EIA Regulations, where it considered the proposed development in the context of Schedule 2, and based on the information submitted, is of the opinion that there are not likely to be any significant environmental effects (in terms of the meaning of significant in the EIA Regulations) and therefore it was recommended that the proposed development would not be EIA development.

### **WASTE MANAGEMENT ISSUES**

#### **Surrey Waste Plan 2008 (SWP 2008)**

Policy WD2 – Recycling, Storage, Transfer, Materials Recovery and Processing Facilities (Excluding Thermal Treatment)

Policy CW4 – Waste Management Capacity

Policy CW5 – Location of Waste Facilities

#### **Guildford Borough Submission Local Plan: strategy and sites**

**December 2017 (GBLP 2017)** Policy S1 – Presumption in favour of sustainable development

37. In England, the waste hierarchy is both a guide to sustainable waste management and a legal requirement, enshrined in law through the Waste (England and Wales) Regulations 2011. The hierarchy gives top priority to waste prevention, followed by preparing for re-use, then recycling, other types of recovery (including energy recovery), and last of all disposal (e.g. landfill).
38. The National Planning Policy Framework 2012 (NPPF) does not contain policies relating to waste management. Instead national waste management policies are contained within the National Planning Policy for Waste 2014 (NPPW) and Waste Management Plan for England 2013 (WMP).
39. The WMP argues that the dividends of applying the waste hierarchy will not just be environmental. The costs of waste treatment and disposal can be reduced and we can save money by making products with fewer natural resources. It also advocates that the benefits of sustainable waste management will be realised in a healthier natural environment and reduced impacts on climate change as well as in the competitiveness of our business through better resource efficiency and innovation – a truly sustainable economy. In this context the NPPF, at paragraph 19, states that significant weight should be placed on the need to support economic growth through the planning system.

40. The NPPW also sets out that the Government's ambition of working towards more sustainable and efficient approaches to resource use and management by driving waste management up the waste hierarchy and helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment.
41. The NPPF sets out that a presumption in favour of sustainable development should be seen as a golden thread when taking decisions by approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or specific policies in the NPPF indicate development should be restricted.
42. SWP 2008 Policy CW4 states that planning permissions will be granted to enable sufficient waste management capacity to be provided to:
- manage the equivalent of the waste arising in Surrey, together with a contribution to meeting the declining landfill needs of residual wastes arising in and exported from London; and
  - achieve the regional targets for recycling, composting, recovery and diversion from landfill by ensuring a range of facilities is permitted.
43. SWP 2008 Policy CW5 states that sites will be allocated, and proposals for waste facilities on unallocated sites will be considered in accordance with the following principles:
- priority will be given to industrial/ employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network;
  - priority will be given over greenfield land to previously developed land, contaminated, derelict or disturbed land, redundant agricultural buildings and their curtilages, mineral workings and land in waste management use;
  - Areas of Outstanding Natural Beauty, Areas of Great Landscape Value, and sites with or close to international and national nature conservation designations should be avoided; and
  - the larger the scale of development and traffic generation, the more important is a location well served by the strategic road network or accessible by alternative means of transport.
44. SWP 2008 Policy WD2 states that planning permissions for development involving the recycling, storage, transfer, materials recovery and processing (including in-vessel composting but excluding thermal treatment) of waste will be granted on land that is, or has been used or has planning permission for industrial or storage purposes, provided that the proposed development does not have any significant impacts and where very special circumstances can be demonstrated in accordance with the provisions of Policy CW6 for Development in the Green Belt.

45. GBLP 2017 Policy S1 states that planning applications will take into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or Specific policies in that Framework indicate that development should be restricted.

### **Need for the Waste Paper and Waste Cardboard Recycling Facility**

46. Pirbright Parish Council and 6 letters of representation have raised objections to the development as Cobbett Hill Earth Station is not suitable for waste facilities as it is not a designated waste site in the SWP 2008. 4 letters of representation have commented that the development is not in line with current planning policies. 1 letter of representation also points out that there is already a recycling facility along the A323 Aldershot Road which is located within half a mile of the site.
47. The applicant states that the proposed development is to replace the former facility at West Horsley Place Estate as the site at West Horsley is no longer available due to the redevelopment project of the West Horsley Place Estate. They have already established a customer base within the Guildford and Farnham area, however they currently have to serve their customers from their main site in Charlton, south east London. The applicant sets out that it is not a sustainable solution given that the additional distance required to transport the collected waste paper and waste cardboard and therefore they intend to establish a new facility within the catchment area. The applicant has also submitted a letter from the West Horsley Place Estate to demonstrate that the applicant was in harmony with the adjoining sites without causing any undue aggravation or difficulty.
48. The proposed facility will process approximately 275-300 tonnes per week of waste paper and waste cardboard, which equates to approximately 15,000 tonnes per year and has two major functions:
- waste paper and waste cardboard sorting, and
  - bailing of recovered paper and cardboard for transfer to a recycling facility

The applicant argues that the proposed facility plays an important role in sustainable waste management in Surrey as their provision of waste paper and waste cardboard recovery service can help collect the waste paper and waste cardboard so as to prevent them to become a refuse derived fuel (RDF) product or to be sent to landfill, which is not in line with the waste hierarchy.

49. Officers agree with the Pirbright Parish Council and residents that Cobbett Hill Earth Station is not an allocated site of the SWP 2008. However, Cobbett Hill Earth Station is an active industrial site and has a planning permission for general industrial or storage purposes<sup>1</sup>. Paragraph B12 and B36 of the SWP 2008 both advocate

---

<sup>1</sup> In May 2003, Certificate of Lawfulness to establish the existing uses and buildings in order that the site may continue to be used for offices, research and

that waste management facilities should be suited to development on industrial sites and in urban areas. Furthermore, Paragraph C7 also recognises that bulking up waste is necessary as it can reduce the overall impact from transport movements. Paragraph C8 continues to state that recycling, recovery and processing facilities are expected to enable and to encourage waste to be used as a resource, and to recover materials that will be put to beneficial use.

50. Officers do not consider that there are similar waste facilities handling waste paper and waste cardboard within the area as the waste facility located along the A323 Aldershot Road to handles topsoil, composts, aggregate and bark, whilst the proposed development is to provide a waste paper and waste cardboard recycling and transfer facility.
51. Officers consider the applicant has fully demonstrated the need for the proposed development and the proposed facility can support the sustainable waste management policy for Surrey. In England, the NPPW and WMP both seek to reduce dependence on landfill and give priority to move sustainable forms of waste management by moving waste management up the waste hierarchy with prevention at the top followed by preparing for reuse, recycling, recovery and last of all disposal. Therefore, Officers consider that the proposed development is in accordance with policies CW3, CW4, CW5 and WD2 of the Surrey Waste Plan 2008.

### Hours of Operation

52. Friends of Normandy Wildlife has commented that the twelve hours of noise pollution from 0600 to 1800 will affect the neighbouring land and have an impact on the '*noise resistant birds*', such as Dartford Warbler, Nightjar, Tree Pipit, Woodlark, etc. Worplesdon Parish Council has also commented that a condition should be imposed to restrict the deliveries so as to protect the local amenities.
53. The applicant has provided additional information on the proposed operating hours for the development. The applicant points out that the proposed operating hours as stated in the Planning Statement are consistent with the vehicle operators' licence granted by the Central Licensing Office<sup>2</sup>. There are also no restrictions on operating hours for the existing lawful and consented industrial use of the site.
54. However, the applicant has agreed to the following restrictions on operating hours. The reason for the 0600 start is to allow the 4 HGVs based at the application site to depart the site in order to arrive at their first collection points by the times agreed. It is expected that these vehicles are unlikely to return to the application site until 0930 to 1000 after they have completed the collection. The

---

light industrial (B1 use class) with ancillary storage (B8 use class) was granted by the Guildford Borough Council.

<sup>2</sup> The Central Licensing Office confirmed that the applicant has a valid licence subject to the following conditions: (1) The six vehicles and one trailer authorised under this licence will enter and exit the operating centre in forward gear only; and (2) There will be no operation, movement, loading or unloading of the authorised vehicle and trailer at the operating centre before 08:00 and after 12:00 on Saturdays; and there shall be no operation, movement, loading or unloading of the authorised vehicle or trailer on Sundays and Public Holidays.

applicant also states that there will be no waste operations, such as sorting and baling of waste paper or cardboard from 0600 to 0700 and there will be no use of plant and machinery on site from 0600 to 0700 and 1730 to 1800 Monday to Friday. Subject to the request from Officers, the applicant also agrees to have the operating hours from 0700 to 1300 on Saturdays. The Environmental Health Officer has no objections to the proposed operating hours.

55. Officers consider that the applicant has provided sufficient information to demonstrate the need for the proposed operating hours. The applicant has also provided a reasonable justification to illustrate that there is an operational need for the application site to be opened at 0600 from Monday to Friday because of the departure of the 4 HGVs from the application site. No vehicles will use the southern section of the Cobbett Hill Road towards A323 to leave the application site due to the road restriction. As all residential properties along the Cobbett Hill Road are located at the said section of the road, Officers consider that the departure of the 4 vehicles from the application site between 0600 and 0700 Mondays would not give rise to significant adverse impacts on local amenity. Should planning permission be granted, planning conditions are imposed on the relevant permission: to restrict the deliveries and allow only 4 vehicles based at the application site to depart the site; operating hours of the application site and the use of plant and machinery onsite, within permitted hours.

## **ENVIRONMENT AND AMENITY**

### **Surrey Waste Plan 2008 (SWP 2008)**

Policy DC2 – Planning Designations

Policy DC3 – General Considerations

### **Guildford Borough Local Plan 2003 (GBLP 2003)**

Policy G1 (3) – Protection of Amenities enjoyed by Occupants of Buildings

Policy G1 (7) – Land Drainage and Public Utility Infrastructure

Policy G1 (8) – Light Pollution

Policy G5 (2) – Scale, Proportion and Form

Policy NE1 – Potential Special Protection Areas (pSPA) and Candidate Special Areas of Conservation (cSAC)

Policy NE2 – Sites of Special Scientific Interest

Policy NE3 – Local and Non-statutory Sites

### **Guildford Borough Submission Local Plan: strategy and sites December 2017 (GBLP 2017)**

Policy D4 – Character and design of new development

Policy P4 – Flooding, Flood risk and groundwater protection zones

Policy P5 – Thames Basin Heaths Special Protection Area

56. NPPW requires waste planning authorities, in determining planning applications, should work on the assumption that the relevant pollution control regime will be properly applied and enforced, ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located, and consider the likely impacts on the local environment and amenities against the criteria set out in Appendix B (Locational Criteria), which include the following factors:

- protection of water quality and resources and flood risk management
  - land instability
  - landscape and visual impacts
  - nature conservation
  - conserving the historic environment
  - traffic and access
  - air emissions, including dust
  - odours
  - vermin and birds
  - noise, light and vibration
  - litter
  - potential land use conflict
57. Conserving and enhancing the natural environment is one of the key principles of the NPPF, paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by:
- protecting and enhancing valued landscapes, geological conservation interests and soils;
  - recognising the wider benefits of ecosystem services;
  - minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
  - preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
  - Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
58. Paragraph 122 of the NPPF also advocates that local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regime, Local planning authorities should assume that these regimes will operate effectively.
59. SWP 2008 Policy DC2 states that planning permission will not be granted for waste related development where this would endanger, or have a significant adverse impact on Special Areas of Conservation (SAC), candidate Special Areas of Conservation (cSPA), Special Protection Area (SPA), potential Special Protection Area (pSPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Importance (SNCI), unless the development can demonstrate that any significant adverse impacts identified could be controlled to acceptable level in accordance with prevailing national policy and guidance. The assessment will also take into account whether any significant adverse impacts identified could be controlled to acceptable levels.
60. SMP 2008 Policy DC3 states that planning permissions for waste related development will be granted provided it can be

demonstrated by the provision of appropriate information to support a planning application that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land infrastructure and resources. Relevant assessments and appropriate mitigation should be identified so as to minimize or avoid any material adverse impact and compensate for any loss.

61. GBLP 2003 Policy G1(3) states that the amenities should be protected from unneighbourly development in terms of privacy, access to sunlight and daylight, noise, vibration, pollution, dust and smell. Policy G1 (7) states that adequate land drainage and public utility infrastructure is in place to meet the needs of the development. Policy G1 (8) states that external lighting is designed to minimise glare and the spillage of light from the site. Policy G5 (2) also states that development should respect the scale, height, and proportions and materials of the surrounding environment.
62. GBLP 2003 Policy NE1 states that planning permission will not be granted for proposals which are likely to destroy or have an adverse effect directly or indirectly on the nature conservation value of pSPA and cSAC. Policy NE2 goes on to state that development which would harm SSSI will not be permitted unless the reasons for development clearly outweigh the intrinsic value of the site itself and the national policy to safeguard the nature conservation value of such sites. Policy NE3 states that planning permission will not be granted for proposals which are likely to materially harm the Nature Conservation Interest, directly or indirectly, local or non-statutory sites, including Local Nature Reserves and SNCI, unless clear justification is provided that the reasons for the development outweigh the value of the site in its local or regional context.
63. GBLP 2017 Policy D4 states that high quality design is expected. In this case, all developments should have the followings:
  - integrate well with the natural, built and historic environment,
  - ensure appropriate density to make the most efficient use of the land whilst responding to local character and context, and
  - have no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight
64. GBLP 2017 Policy P4 states that all development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Priority will be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it can be demonstrated that they are not appropriate.
65. GBLP 2017 Policy P5 states that permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths SPA, whether alone or in combination with other development. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity. There measures must be agreed with Natural England.

## **Removal of Permitted Development Rights**



66. According to paragraph 017 of the Planning Practice Guidance (PPG)<sup>3</sup>, conditions restricting the future use of permitted development rights or changes of use will rarely pass the test of necessity and should only be used in exceptional circumstances. The scope of such conditions needs to be precisely defined, by reference to the relevant provisions in the Town and Country Planning (General Permitted Development) (England) Order 2015, so that it is clear exactly which rights have been limited or withdrawn.
67. The application site is within the Green Belt and is immediately adjacent to the Thames Basin Heaths Special Protection Area (SPA), Cobbett Hill Common Special Area of Conservation (SAC) and the Ash to Brookwood Heaths SSSI. The Clasford Bridge Road Site of Nature Conservation Importance (SNCI) is also located approximately 160 metres south east of the application site. Officers consider that a condition should be imposed to secure that the County Planning Authority has adequate control on the proposed development and to minimise its impact on the amenities of the local area in accordance with the Policy DC2 of the SWP 2008.

### **Ecology and Biodiversity**

68. Paragraph 118 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
  - proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSI;
  - development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;
  - opportunities to incorporate biodiversity in and around developments should be encouraged;
  - planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and
  - pSPA and possible SAC; listed or proposed Ramsar sites<sup>4</sup>; and sites identified, or required, as compensatory measures for

<sup>3</sup> Reference ID: 21a-017-20140306

<sup>4</sup> Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public

adverse effects on European sites should be given the same protection as European sites

69. Section 40 of the Natural Environment and Rural Communities Act 2006 clearly illustrates that the County Planning Authority is responsible to consider biodiversity in the full range of their activities including determining planning applications. Although the application site is not covered by any nature conservation designations, it is immediately adjacent to the Thames Basin Heaths SPA, Cobbett Hill Common SAC and the Ash to Brookwood Heaths Special SSSI. The Clasford Bridge Road SNCI is also located approximately 160 metres south east of the application site.
70. Friends of Normandy Wildlife and 4 letters of representations have raised objections to this application as it is threat to the rare species of birds, such as Dartford Warbler, Nightjar and Woodlark. 7 letters of representations have also commented that the proposed development will increase the fire risk. Ash Parish Council and 38 letters of representations also have raised objections to this application as it is threat to the natural environment, SPA and SSSI. 1 letter of representation also comments that the proposed development will cause chemical pollution.
71. The applicant undertook an ecological walkover survey of the application site on 14 December 2016. However, Natural England was not satisfied with the initial survey and requested that additional information in the form of a Habit Regulations Assessment Screening should be provided. The Report should also include a set of information to justify the conclusions. In response, the applicant submitted a 'Report to Inform Habitats Regulations Assessment Screening' dated July 2017 which concluded that there will be no likely significant effects on the qualifying features of European designated sites.
72. According to the submitted Report to Inform Habitats Regulations Assessment Screening dated July 2017, it states that the application site is subject to existing human disturbance and is unlikely to be used by any ground nesting bird species. Although it recognises that it has potential to impinge on adjacent habitats, a protective fencing is erected to mark the site boundary clearly and prevent any ingress over the designated sites. Regarding the potential fire risk, the applicant states that appropriate fire prevention measures will be adopted to reduce the risk of fire.
73. The application site is within the existing Cobbett Hill Earth Station, comprising an area of open hardstanding and with no existing vegetation. Therefore, it is considered that no vegetation will be removed from the application site.
74. Surrey Wildlife Trust has raised no objection to the proposed development on nature conservation or ecological grounds. As the proposed development is immediately adjacent to an important designated habitat, part of the Thames Basin Heaths SPA, Thursley Ash, Pirbright and Chobham Commons SAC and Ash to Brookwood Heaths SSSI, the Trust recommends that sufficient robust

---

consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

mechanisms should be in place to prevent pollution and disturbance of the habitats and the import species. A Construction and Environmental Management Plan (CEMP) for the development process should also be approved to provide adequate controls on environmental management.

75. Natural England has raised no objection to the proposed development subject to the following appropriate mitigation measures. It is recommended that no storage of materials is allowed within 5 metres of the fence lines. Any toxic or otherwise environmentally damaging materials such as hydrocarbons, concrete or acids should be contained within an impermeable bund which will contain any accidental spillages or leakages. Natural England also recommends that this application should be accompanied by a Section 106 planning obligation, which guarantees the inclusion of barriers or gates that will be closed and locked outside of operational hours, identification access is required and signage should also be erected at the sites entrance to deter people from using the site as easy access to the SPA, SSSI and SAC.
76. Regarding the requirement for a Section 106 planning obligation to ensure barriers and signage are erected at the site entrance to prevent public access to the SPA, SSSI and SAC, the applicant states that the application site is within the Cobbett Hill Earth Station, which already has secure fencing on all boundaries and benefits from security gates at the main entrance. Therefore, sufficient measures are already in place to prevent any public access to the SPA, SSSI and SAC.
77. According to paragraph 204 of the NPPF, it states that planning obligations should only be sought where they meet all of the following tests, including necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.
78. The County Ecologist agrees with the applicant that it is not necessary to have a Section 106 planning obligation regarding the site security and has no objections to the proposed development subject to an imposition of conditions suggested by the Surrey Wildlife Trust and Natural England to submit a CEMP. Natural England is satisfied with this approach and agrees that the Section 106 planning obligation is not required in this case. As the existing secure fencing of the Cobbett Hill Earth Station has provided sufficient measures to prevent any public access to the SPA, SSSI and SAC, Officers therefore agree that the test fails in this case, and a planning obligation is considered not to be necessary.
79. According to paragraph 003 of the PPG<sup>5</sup> and paragraph 206 of the NPPF, both documents state that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Paragraph 004<sup>6</sup> and 005<sup>7</sup> of the

---

<sup>5</sup> Reference ID: 21a-003-20140306

<sup>6</sup> Reference ID: 21a-004-20140306

<sup>7</sup> Reference ID: 21a-005-20140306

PPG continues to state that whether it is appropriate for the County Planning Authority to impose a condition on a grant of planning permission will depend on the specifics of the case. Conditions should help to deliver development plan policy and accord with the requirements of the NPPF, including satisfying the 6 tests for conditions. The 6 tests must all be satisfied each time a decision to grant planning permission subject to conditions is made. Any proposed conditions that fail to meet any of the 6 tests should not be used.

80. Officers consider that an informative shall be imposed to remind the applicant that any toxic or otherwise environmentally damaging materials such as hydrocarbons, concrete or acids must be contained within an impermeable bund which will contain any accidental spillages or leakages to prevent chemical pollution.
81. Both statutory and non-statutory consultees are satisfied with the details provided, Officers therefore consider that the proposed development is acceptable subject to a pre-commencement condition to secure that a CEMP is submitted. Conditions should also be imposed to restrict the storage of materials within 5 metres of the fence lines from the site boundaries with the SPA, SSSI and SAC and any access onto the SPA, SSSI and SAC.

#### **Air Quality and Dust Control**

82. Ash Parish Council, Pirbright Parish Council, Friends of Normandy Wildlife and 16 letters of representations have raised objections to the development as the wind-blown litter will have an impact on the adjoining heathland. 7 letters of representation have also commented that air pollutants from the HGVs will also have a negative impact on the environment.
83. The applicant submitted a Litter and Dust Management Plan dated June 2017 in order to address the litter and dust management issues. The Plan also outlines the appropriate measures to control litter and dust for each specific operation, including: delivery & collection, reception area, storage, stockpiling, monitoring, recovery & transfer site and site haul road. The submitted Planning Statement dated July 2017 also states that the 3 metres in height steel palisade / chain link perimeter boundary fencing will be fitted with a screening mesh to ensure any loose windblown material is captured on site.
84. Both the County Air Quality Consultant and Natural England have raised no objections to the proposed development. Surrey Wildlife Trust also has no objections to the development subject to sufficient robust mechanisms being in place to prevent dust pollution, disturbance from human and vehicular activity.
85. The County Ecologist has raised concerns about the windblown issues and the uncovered waste recycling and transfer facility immediately adjacent to Ash to Brookwood Heaths SSSI, a component site of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.
86. Further to correspondence from the comments from the statutory and non-statutory consultees and the public, the applicant submitted

a letter to provide further details on ecology. The applicant amended the operational layout of the site by relocating the waste reception area and bailing operation away from the site boundary with the SPA, SSSI and SAC areas so as to reduce the potential for any windblown litter impacting on the designated land. Both the County Ecologist and Natural England welcomed the amended layout and consider that the submitted Litter and Dust Management Plan is sufficient in managing air quality and dust control on the application site.

87. Officers consider that the 3 metres in height steel palisade / chain link perimeter boundary fencing including a screening mesh and the amended operational layout can reduce the potential for any windblown litter. Officers therefore consider that the details submitted are acceptable subject to a condition which will be imposed to secure that the submitted Litter and Dust Management Plan is implemented as approved. The applicant is also required to report to the County Planning Authority within 7 working days if any complaints or concerns relating to air quality and dust arising from the development hereby permitted are received.

### **Noise Control**

88. Paragraph 123 of the NPPF states that planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions; recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established;<sup>8</sup> and identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.
89. Ash Parish Council, Friends of Normandy Wildlife and 30 letters of representations have raised objections to the proposed development as the operation of the proposed waste paper and waste cardboard facility and the HGVs movements would cause noise pollution. County Noise Consultant is not satisfied with the submitted noise assessments<sup>9</sup> and comments that they are inadequate and unclear. The applicant has also submitted a Report to Inform Habitats Regulations Assessment Screening dated July 2017. In the Report, section 5.2 has comprehensively assessed the

---

<sup>8</sup> Subject to the provisions of the Environmental Protection Act 1990 and other relevant law.

<sup>9</sup> The applicant has submitted a Noise Assessment Report dated July 2017 and the Report concludes that proposed development will not have a significant adverse noise impact on the amenity. However, the County Noise Consultant (CNC) is not satisfied with the submission. Subject to the requirement of the CNC, the applicant submitted two Noise Assessment Reports dated August 2017 and October 2017. The applicant also submitted a letter dated 14 November 2017 to respond to comments received from the CNC. The CNC is still not satisfied with the submissions and requires the applicant to re-submit a noise assessment.

potential impacts on the Thames Basin Health SPA and Thursley, Ash, Pirbright and Chobham SAC.

90. During the construction phase, it is considered that there will be no severe noise impacts affecting the species within the SPA and SAC as there will be no significant noise effects as a result of construction operations such as piling. During the operation of the proposed development, the noise levels are also not anticipated to have a significant noise effect on the surrounding habitats due to ambient noise associated with the existing use of the Cobbett Hill Earth Station and the traffic.
91. Surrey Wildlife Trust has raised no objection to the proposed development subject to sufficient robust mechanisms being in place to prevent noise pollution. The County Ecologist is also satisfied with the Report and considers that the conclusion made is valid subject to a pre-commencement condition should be imposed to secure that the applicant has to submit a Construction and Environmental Management Plan.
92. The NPPF recognises that planning decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, including to mitigate and to reduce the adverse impacts on health and quality of life arising from noise from new development through the use of conditions. Officers consider that the proposed development would not have a significant noise impact on the amenity during the construction and operation phases, subject to conditions. Officers and the County Noise Consultant consider that a pre-commencement condition should be imposed to secure the submission of a detailed noise assessment, including a noise assessment report, a scheme of mitigation and a noise monitoring plan.
93. The application site is within an active industrial site and it is important to assess that the noise level of the proposed development should not create severe impacts on the existing noise level. Officers consider that the details submitted are acceptable and agree with the County Ecologist and Surrey Wildlife Trust that there will be no significant noise impacts on the nearby sensitive area during the construction phase of the proposed development subject to the imposition of conditions to secure that sufficient robust mechanisms being in place to prevent noise pollution. A pre-commencement condition is also required to secure that the applicant has to provide a Construction and Environmental Management Plan prior to the commencement of the development. This will be covered under noise pre-commencement scheme.

### **Lighting and Visual Impact**

94. Paragraph 125 of the NPPF sets out that planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation by encouraging good design.
95. Ash Parish Council, Friends of Normandy Wildlife and 21 letters of representations have raised objections to the proposed development due to their concern in respect of light pollution. The

Friends of Normandy Wildlife also raise their concern that light pollution may also cause disorientation and changes to feeding patterns of animals. Another letter of representation also raises the concern regarding the visual pollution to the local amenities.

### *Lighting*

96. The submitted Planning Statement dated July 2017 states that lighting units are required to permit safe working during the hours of darkness. The applicant also states that a lighting scheme has been designed to avoid light spillage beyond the site boundary. This lighting would not be necessary outside normal working hours. The submitted Lighting Assessment dated July 2017 concluded that the proposed development accords with both national and local policies in respect to lighting and will not have any adverse impacts on the surrounding dark sky landscape. The lighting on the site boundary would also be fitted with light baffles to prevent light spill so as to reduce the impacts on the nearby natural environment. The submitted 'Report to Inform Habitats Regulations Assessment Screening' dated July 2017 states that no new lighting is required during the construction phase of the development as the works will be done in daylight hours.
97. Both the County Lighting Consultant and the Natural England have raised no objection to the proposed development. The County Lighting Consultant considers that the lighting is generally within the site boundary, with minimal spill lighting external to the site boundary and negligible sky glow. Both the County Landscape Architect and the Surrey Wildlife Trust have raised no objection to the development on landscape and visual grounds subject to sufficient robust mechanisms should be in place to prevent pollution from lighting.
98. Given the purposes of operational need, Officers consider that the details submitted are acceptable and the proposed lighting units would not give rise to any adverse impacts on the surrounding environment. However, a condition will be imposed to secure that the submitted Lighting Assessment is implemented as approved. Another condition regarding the restriction on the operations and working hours will be imposed on this application to impose control on the operations, so as to protect local amenity.

### *Fencing*

99. The submitted Planning Statement dated July 2017 states that the 3 metres in height steel palisade / chain link perimeter boundary fencing will be fitted with a screening mesh along the site boundary. The fencing is to ensure any loose windblown material is captured on site and to prevent unauthorised access to the adjoining heathland.
100. Officers consider that the fencing with a screening mesh is for the purpose of windblown prevention and security reasons. The applicant has also provided sufficient information to demonstrate the operational need of the fencing and the proposed fencing would not give rise to any adverse visual impacts on the surrounding environment.

## Groundwater Protection and Flooding Prevention

101. Paragraph 100 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere<sup>10</sup>.
102. Paragraph 4.3.48 of the GBLP 2017 also states that Sustainable Drainage Systems (SuDS) should be provided on all new development unless it can be demonstrated that such measures are inappropriate and suitable alternative drainage mechanisms are proposed.

### *Groundwater Protection*

103. 8 letters of representation have raised objections to the development as it will lead to groundwater pollution. The applicant states that the proposed development would result in the resurfacing of the application site to concrete so as to replace the existing hardstanding.
104. The Environment Agency (EA) has raised no objection to the proposed development. However they do raise issues in respect of the need for adequate protection of the groundwater quality if infiltration drainage is proposed. They commented that all infiltration (SuDS) should not be located greater than 3 metres below ground level to be a deep system and require a minimum of 1 metre clearance between the base and peak seasonal groundwater levels.
105. Officers consider that the application site is not within the groundwater protection zones and the applicant has provided sufficient information to demonstrate the protection of groundwater.

### *Flooding Prevention*

106. The application site is located within the Flood Zone 1 which has the lowest risk of flooding. However, the resurfacing of the application site to concrete is considered to potentially increase the surface run-off. As such, the applicant also submitted a surface water drainage scheme according to the sustainable drainage systems (SuDS) principles.
107. The SuDS must also not be constructed in ground affected by contamination. The Local Lead Flood Authority (LLFA) is satisfied with the principles set out in the proposed drainage scheme, subject to a condition requiring the SuDS Scheme should be implemented properly. Surrey Wildlife Trust also has raised no objection to the proposed development subject to sufficient robust mechanisms being in place to prevent pollution from water flow off the site and contaminated liquid spill.
108. Officers consider that the applicant has provided sufficient information subject to a condition recommended by the LLFA to ensure that the SuDS Scheme is properly implemented by

---

<sup>10</sup> Technical guidance on flood risk published alongside this Framework sets out how this policy should be implemented.



submitting a verification report prior to the operation of the proposed facility.

## **TRAFFIC AND HIGHWAYS**

### **Surrey Waste Plan 2008 (SWP 2008)**

Policy CW5 – Location of Waste Facilities

Policy DC3 – General Considerations

109. Paragraph 32 of the NPPF states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvement can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe

110. SWP 2008 Policy CW5 states that priorities will be given to the unallocated sites which are within the industrial/ employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network.

111. SWP 2008 Policy DC3 states that planning permissions for waste related development will be granted provided it can be demonstrated by the provision of appropriate information to support a planning application that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land infrastructure and resources. Relevant assessments and appropriate mitigation of the following matters should be identified so as to minimize or avoid any material adverse impact and compensate for any loss, including the adverse effects on neighbouring amenity including transport impacts and the traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the motorway and the primary route network.

112. Pirbright Parish Council and Ash Parish Council and residents have raised objections to the proposed development due to the following reasons:

- poor condition and weight restriction of Cobbett Hill Road
- an enforcement issue in controlling vehicles from the application site to use the northern section of the Cobbett Hill Road towards A324 Aldershot Road to enter and exit the application site
- turning from Cobbett Hill Road to A324 Aldershot Road is considered to be dangerous and also the additional traffic may increase the traffic pressure in Pirbright and the surrounding areas

- increase in the number of lorry at the A323 / A324 Aldershot Road and have concerns regarding the unsuitability of Ash Road, Fox Corner and Bullswater Bridge

113. Regarding the safety issue, residents also raised concerns regarding the potential threat to other road users, such as horse riders, pedestrians, cyclist and Army Cadets who use Cobbett Hill Road.
114. According to the submitted Planning Statement dated July 2017, the applicant states that vehicles will **only** use the northern section of Cobbett Hill Road as there is a weight restriction on the southern section. Officers have already raised this issue with the applicant and both parties agreed with the suggested routing during the pre-application stage.
115. On 05 October 2017, the applicant submitted a letter regarding the additional information on highways. The letter states that only the northern section of Cobbett Road will be used for access. The authorised HGVs will then turn right out of the application site to Cobbett Hill Road, and they will travel north and reach the A324 junction. The HGVs will turn then left to use the A323 only towards the A331 and the A31 and will not enter the Pirbright area. Therefore, it is considered that there will be no adverse impacts on local amenities, where the nearest public Right of Way (RoW) and residential properties along Cobbett Hill Road are all located at the southern part of Cobbett Hill Road. The applicant also stated that they have been operating their HGVs from the application site since January 2017 in accordance with the Vehicle Operators Licence (VOL) granted by the Central Licensing Office<sup>11</sup>. There have been no complaints or reports of incidents regarding the applicant's operation since the VOL granted. Officers consider that an informative will be imposed to remind the applicant regarding the control on the authorised vehicles under the relevant Licence granted by the Central Licensing Office.
116. The County Highway Authority (CHA) has no objections to the proposed development subject to conditions. Worplesdon Parish Council also recommended a condition to be imposed to secure that all authorised HGVs will use the suggested route. Officers, in conjunction with the CHA, consider that the applicant has provided sufficient information to demonstrate that the proposed development will not adversely affect the existing road network. However, Officers have raised concerns to the suggested conditions regarding the turning arrangement and vehicle routing.
117. With the weight restriction of the southern section of Cobbett Hill Road, it is physically impossible for HGVs to access into the site from the southern section. The condition suggested by the CHA regarding the access into the site is considered to be not necessary and hence it is considered to fail to meet the 6 tests for conditions.

---

<sup>11</sup> OK1047264 TGM Environmental Ltd, six vehicles and one trailer, following conditions attached: The vehicle authorised under this licence will enter and exit the operating centre in forward gear only. There will be no operation, movement, loading or unloading of the authorised vehicle and trailer at the operating centre before 0800 and after 1200 on Saturdays; and there shall be no operation, movement, loading or unloading of the authorised vehicle or trailer on Sundays and Public Holidays.

However, Officers consider that a condition should be imposed to require the applicant to erect a signage within the application site to remind the authorised vehicles can only exit the site by turning right onto Cobbett Hill Road, prior to the operation of the waste paper and waste cardboard recycling and transfer facility. Officers also consider that an informative will be imposed to remind the applicant of the turning arrangement suggested by the CHA.

118. The CHA comments that the submitted Transport Assessment dated July 2017 sets out the proposed vehicular movements for the site, it identifies that there will be 260 vehicle movements per week, the site operates Monday to Saturday but with majority of movement occurring from Monday to Friday. There will be an average of 48 vehicle movements (including HGV, 3.5 tonnes and cars) per weekday, 24 inbound and 24 outbound. Movement on Saturdays will be about 30% of weekday movement. On the Saturday there will be an average of 16 vehicle movements, 8 inbound and 8 outbound. In terms of HGV movements the proposed operation will generate approximately 154 HGV movements per week, 77 inbound and 77 outbound. For daily movement in the weekday this is approximately 14 inbound movements and 14 outbound movements. Taking the operating hours as that set out in the Transport Assessment (06.00-18.00) this results in 2 HGV movements per hour. The CHA therefore concludes that the proposed vehicular movements associated with this application are unlikely to result in a significant difference in vehicular traffic movement when compared with the consented use.
119. Paragraph 009 of the PPG states that conditions requiring works on land that is **NOT** controlled by the applicant, or that requires the consent or authorisation of another person or body often fail the tests of reasonableness and enforceability<sup>12</sup>.
120. Given that the suggested routing will not get access into Pirbright areas and the proposed development will not incur a result in a significant difference in vehicular traffic movement when compared with the consented use, Officers consider that a condition to secure the routing is not enforceable and reasonable. Therefore, it is considered to fail to meet the 6 tests for conditions. However, Officers consider that an informative will be imposed to remind the applicant that the authorised vehicles must access the site via the suggested vehicle routing.

## **METROPOLITAN GREEN BELT**

### **Surrey Waste Plan 2008 (SWP 2008)**

Policy CW6 – Development in the Green Belt

### **Guildford Borough Local Plan 2003 (GBLP 2003)**

Policy E2 – Redevelopment of existing business, industrial and warehousing land in urban areas and within identified settlements in the Green Belt

Policy RE2 – Development within the Green Belt

### **Guildford Borough Submission Local Plan: strategy and sites**

**December 2017 (GBLP 2017)** Policy P2 – Green Belt

<sup>12</sup> Reference ID: 21a-009-20140306

121. The protection of Green Belts around urban areas is one of the key planning principles of the National Planning Policy Framework (NPPF). Paragraph 79 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Paragraph 87 states that *“inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances”* and paragraph 88 goes on to state that when considering *“any planning application”* authorities should ensure that *“substantial weight is given to any harm to the Green Belt”* and that *“very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”*
122. Paragraph 89 and 90 states that what types of developments are “appropriate” in the Green Belt. Waste-related development is not included in paragraphs 89 and 90 and therefore, waste-related development is considered to be an “inappropriate” development in the Green Belt. The construction of new facilities is also “inappropriate” unless they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
123. SWP 2008 Policy CW6 states that *“there will be a presumption against inappropriate waste related development in the Green Belt except in very special circumstances. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”* It goes on to state that the following considerations may contribute to very special circumstances:
- (i) the lack of suitable non-Green Belt sites;
  - (ii) the need to find locations well related to the source of waste arisings;
  - (iii) the characteristics of the site; and
  - (iv) the wider environmental and economic benefits of sustainable waste management, including the need for a range of sites.
124. GBLP 2003 Policy E2 states that planning permission for the re-use of existing business, industrial and warehousing land in the urban areas, or within identified settlements in the Green Belt will be granted for:
- the part or total redevelopment of existing business, industrial and warehousing premises or land;
  - the expansion of an existing firm where it can be satisfactorily accommodated within the existing curtilage of the premises or on immediately adjacent land;
  - changes of use to other business, industrial and warehousing uses. Provided that any development is suitably located in terms of its impact on the environment, levels of traffic movement, its accessibility to public transport and its links with the infrastructure, and its impact on the amenity of the area or adjoining occupiers.
125. GBLP 2003 Policy RE2 states that new building will be deemed inappropriate within the Metropolitan Green Belt unless it is for the following purposes:

- Agriculture and forestry;
- Essential facilities for outdoor sport and outdoor recreation, cemeteries and other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land within it;
- Limited extension, alteration or replacement of existing dwellings

126. GBLP 2017 Policy P2 states that the Metropolitan Green Belt will continue to be protected. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.

### **Harm to the Green Belt**

127. Worplesdon Parish Council, Pirbright Parish Council and 31 letters of representations have raised objections to the proposed development as it is inappropriate within the Green Belt. Pirbright Parish Council has also raised their concern that the proposed development would have impact on the openness of the Green Belt.
128. The application site is located within the active industrial site, which has a Certificate of Lawfulness granted by the Guildford Borough Council in May 2003 to be used for offices, research and light industry with ancillary storage<sup>13</sup>. The proposed development comprises a range of on-site infrastructures including a weighbridge, a Portakabin site office, a waste reception area, an operation area including a baling plant and conveyor, a storage bay for bales, a staff parking area and lorry parking area, 10 No. lighting units and 3 metres in height steel palisade / chain link perimeter boundary fencing. The applicant states that there is an operational need of the 3 metres in height steel palisade / chain link perimeter boundary fencing and the lighting units. Consequently, the proposed development would introduce structures, works, and activities to land where they would impact the openness of the Green Belt.
129. Nevertheless, Officers consider that the proposed development falls within the category of inappropriate development and would have impact on the openness of the Green Belt. As such, there is presumption against the grant of consent for the proposed development except in very special circumstances. Very special circumstances to justify the development in the Green Belt will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

### **Other Harm**

130. The potential for other harm has been assessed earlier in this report with regard to ecology and biodiversity, air quality and dust control, noise control, lighting and visual impact, groundwater protection and flooding prevention and traffic and highways. Subject to conditions

<sup>13</sup> In May 2003, Certificate of Lawfulness to establish the existing uses and buildings in order that the site may continue to be used for offices, research and light industrial (B1 use class) with ancillary storage (B8 use class) was granted by the Guildford Borough Council.

to be imposed, Officers do not consider that the development would result in any unacceptable impact in these respects. Statutory consultees also have not raised concerns in respect of the proposed development.

### **Very Special Circumstances**

131. Pirbright Parish Council raises their concern regarding the alternative site assessment. Ash Parish Council and Pirbright Parish Council have also raised their concerns in that the applicant has sufficiently demonstrated very special circumstances to justify inappropriate development in the Green Belt.
132. Paragraph B48 of the SWP 2008 outlines that there is an immediate and acute shortfall of waste management facility capacity within the South East Region, including Surrey. It is likely to be necessary to locate some waste management facilities in the Green Belt where non Green Belt sites cannot be found, in order to ensure that the necessary waste management infrastructure can be delivered. Very special circumstances will have to be demonstrated, taking account of the need to make provision for additional waste management capacity and other environmental and economic benefits.
133. The applicant has put forward the following factors which they consider constitute very special circumstances:

#### *The lack of suitable non-Green Belt sites*

134. The applicant has undertaken an alternative site assessment based on the guidance note on Suggested Stages of Alternative Site Assessment and information sources, published by the Surrey County Council<sup>14</sup>. The potential site should allow waste development and be located near to the established customer base, which is within Guildford and Farnham catchment areas. After carrying out an alternative site assessment, 9 sites have been identified, including non-Green Belt sites. However, the applicant has not been able to identify any non-Green Belt sites in the vicinity which would allow waste development. The assessment also identified 4 allocated sites in accordance with the SWP 2008. However, it concluded that these sites are not suitable or available for use by the applicant. The applicant has also contacted Guildford Borough Council, Highways England and other utility providers such as Thames Water regarding the land availability. However, the applicant has received responses confirming that they do not have any land that is currently available for waste development.
135. Paragraph B11 of the SWP 2008 states that there are difficulties of finding sites for waste management as most of the land in Surrey is designated as Green Belt. Officers acknowledge the outcome from the alternative site assessment submitted by the applicant and cannot share the view from Pirbright Parish Council. Officers therefore consider that the applicant has not been able to identify

---

<sup>14</sup> The guidance note on *Suggested Stages of Alternative Site Assessment and information sources* was published on March 2012. For more details, please refer to the following link:  
[https://www.surreycc.gov.uk/\\_\\_data/assets/pdf\\_file/0008/71747/AlternativeSiteAssessmentNote.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0008/71747/AlternativeSiteAssessmentNote.pdf)

any other alternative non-Green Belt sites or other suitable Green Belt sites which would suit the proposed waste use.

*The need to find locations well related to the source of waste arisings*

136. The applicant has established a customer base within Guildford and Farnham catchment areas and therefore the proposed recycling and transfer facility should be located within these areas in order to reduce the distance required to transport the collected waste paper and waste cardboard. The applicant also sets out that they are now operating the recycling and transfer services from their main site in Charlton, which is not considered to be a sustainable practice given that additional distances are required to transport the collected waste paper and waste cardboard.
137. Paragraph A28 of the SWP 2008 states that many waste management facilities will need to be developed, preferably close to the source of waste and generally close to urban areas. Officers consider that the application site is within the applicant's customer catchment areas. The location of the proposed development is particularly important as waste paper and waste cardboard can be brought into without travelling any great distance on the road network.

*The characteristics of the site*

138. The application site is located within the active industrial site and it would not increase the footprint of the industrial site. Furthermore, Cobbett Hill Earth Station has a Certificate of Lawfulness granted by the Guildford Borough Council in May 2003 to be used for offices, research and light industrial with ancillary storage.
139. Paragraph B12 and B36 of the SWP 2008 both advocate that waste management facilities should be suited to development on industrial sites and in urban areas. Given the location of the application site, Officers agree that the proposal also would not result in urban sprawl, lead to the merging of neighbouring towns, or encroach on the countryside.

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

140. The applicant sets out that the proposed development will provide waste paper and waste cardboard recycling and transfer services, thus avoiding the use as refuse derived fuel (RDF) product or disposal at landfill, which is in line with the sustainable waste management policies in Surrey. Officers consider that the provision of waste paper and waste cardboard recycling and transfer facility plays an important role in sustainable waste management in Surrey. The proposed facility will recycle the waste paper and waste cardboard and prevent them from disposal, which accords with the waste hierarchy and the SWP 2008.

**Officers' Assessment**

141. As the development is considered to be an inappropriate development in the Green Belt, it can only be permitted as an exception to policy. Viewed objectively and taken together, Officers

consider that the applicant has provided sufficient information to demonstrate that very special circumstances exist, which include the lack of suitable alternative non-Green Belt sites, the characteristics of the application site, need to be located within the catchment area to enhance a sustainable waste management practice and the wider environmental and economic benefits of the sustainable waste management in accordance with the Waste Hierarchy.

142. As mentioned in the 'Other Harm' section of this section, Officers do not consider that the development would result in any unacceptable impact in these respects. Statutory consultees also have not raised concerns in respect of the development subject to the imposition of conditions. Officers therefore consider that very special circumstances have been demonstrated as required by SWP 2008 Policy CW6 that clearly outweigh the harm to the Green Belt by reason of inappropriateness and other harm, therefore an exception to Green Belt policy in the NPPF, Policy CW6 of the SWP 2008 and Policy P2 of the GBLP 2017 should be made.

---

## **HUMAN RIGHTS IMPLICATIONS**

143. The Human Rights Act Guidance for Interpretation, contained in the Preamble to the Agenda is expressly incorporated into this report and must be read in conjunction with the following paragraph.
144. It is the Officers view that the scale and duration of any potential impacts are not considered sufficient to engage Article 8 or Article 1 and that potential impact can be mitigated by the imposition of planning conditions. As such, this proposal is not considered to interfere with any Convention right.

---

## **CONCLUSION**

145. This planning application is for the proposed development of a waste paper and waste cardboard recovery and transfer facility with overnight HGVs parking for the treatment of approximately 15,000 tonnes of waste paper and waste cardboard per year, which intends to replace the previous facility at West Horsley Estate.
146. The application site is within an active industrial site. Cobbett Hill Earth Station lies within the Metropolitan Green Belt and the Site of Scientific Interest (SSSI) Impact Risk Zone. It is also surrounded to the north, north-west and south-east by the Thames Basin Heaths Special Protection Area (SPA), Cobbett Hill Common Special Area of Conservation (SAC) and the Ash to Brookwood Heaths SSSI. As the site is within the Green Belt and is immediately adjacent to the sensitive natural protection areas, Officers consider that a condition should be imposed to restrict the future use of permitted development rights and to secure that the County Planning Authority has adequate control on the proposed development and to minimise its impact on the amenities in accordance with both national and local development policies.
147. Officers consider that the applicant has provided sufficient information to demonstrate that very special circumstances exist to



outweigh the harm to the Green Belt. Officers also consider following advice from technical consultees and subject to the imposition of planning conditions, the proposed facility would not result in unacceptable ecological, air quality and dust, noise, groundwater protection and flooding prevention, traffic and lighting and visual impacts on the amenity. Officers therefore consider that an exception to Green Belt policy should be made and planning permission should be granted subject to conditions.

**RECOMMENDATION**

The recommendation is to **PERMIT** the application subject to the following conditions.

Conditions:

**-IMPORTANT -**

**CONDITION NO(S) 3 AND 4 MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT.**

**CONDITION NO(S) 5 AND 6 MUST BE DISCHARGED PRIOR TO THE OPERATION OF THE DEVELOPMENT.**

**Approved Documents**

1. The development hereby permitted shall be carried out in all respects in accordance with the following plans/drawings:
  - Drawing Ref. LOC/01 Site Location dated 10 March 2017
  - Drawing Ref. SUR/01 Topographic Survey as at May 2017 dated 13 June 2017
  - Drawing Ref. APP/01 Application Boundary dated 10 March 2017
  - Drawing Ref. ELE/01 Elevations dated 10 March 2017
  - Drawing Ref. LAY/01 (Rev. A) Site Layout dated 20 September 2017
  - Drawing Ref. 160524-TK13 (Rev. B) Swept Path Analysis 16.2m Drawbar Truck

**Commencement**

2. The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission. The applicant shall notify the County Planning Authority in writing seven working days of the commencement of the Development.

**Pre-Commencement**

3. Prior to the commencement of the development hereby permitted, a Construction and Environmental Management Plan shall be submitted and approved in writing by the County Planning Authority. The Construction and Environmental Management Plan shall be implemented strictly in accordance with the approved Plan.
4. Prior to the commencement of the development hereby permitted, a Noise Assessment shall be submitted to and approved in writing by

the County Planning Authority. The Noise Assessment shall include details of:

- a) An Assessment Report should be carried out in accordance with British Standard 4142:2014 'Methods for rating and assessing industrial and commercial sound' (BS 4142:2014) which has identified:
  - the Noise Sensitive Receptors (NSRs);
  - between 06:00 and 07:00 hours (night-time), the Rating Level, LAr(15min), of the combined noise emissions from all plant and activities associated with the application site shall not exceed the existing representative LA90 background sound level at any time by more than +5 dB(A) at the nearest NSR;
  - between 07:00 and 18:00 hours (daytime), the Rating Level, LAr(1hr), of the combined noise emissions from all plant and activities associated with the application site shall not exceed the existing representative LA90 background sound level at any time by more than +5 dB(A) at the nearest NSR.
- b) Mitigation Scheme to achieve the required Rating Levels at each noise sensitive receptor based on (a).
- c) Noise monitoring plan

The Noise Assessment shall be implemented as approved.

### **Pre-Operation**

5. Prior to the operation of the waste paper and waste cardboard recovery and transfer facility, a verification report demonstrating completion of works as set out in the approved Sustainable Urban Drainage System Scheme, shall be submitted and approved in writing by the County Planning Authority.
6. Prior to the operation of the waste paper and waste cardboard transfer and recycling facility, a design scheme of the signage requiring the authorised vehicles to turn right when leaving the site, shall be submitted and approved in writing by the County Planning Authority. The approved signage shall be erected strictly in accordance with the approved scheme.

### **Removal of Permitted Development Rights**

7. Notwithstanding any provision to the contrary under Part 2, Part 4 and Part 7 (Class L) of the Town and Country Planning (General Permitted Development) (England) Order 2015 or any subsequent Order,
  - No plant, building or machinery whether fixed or moveable shall be erected on the application site without the prior written approval of the County Planning Authority in respect of the location, design, specification and appearance of the installation;
  - No external lighting or fencing other than those permitted by this application shall be installed or erected at the application site

### **Hours of Operation**

- 8. Except in emergencies to maintain safe site operations which shall be notified to the County Planning Authority in writing within 7 working days of those emergency operations take place, no lights shall be illuminated nor shall any operations or activities authorised or required by this permission be carried out except between the following times:

Monday to Friday : 0700-1800  
 Saturday : 0700-1300

There shall be no operations or related activities carried out on Sundays, Bank Holidays, Public or National Holidays.

Notwithstanding the above,

- No use of plant and machinery on site and deliveries are allowed between the hours 1730 to 1800 Monday to Friday
- No operation of the authorised vehicles is allowed at the site after 1200 on Saturdays.
- 4 authorised vehicles from the site for collecting purposes only may depart the site between the hours 0600 and 0700 Monday to Saturdays

**Operation**

- 9. No storage of materials is allowed within five metres of site boundaries adjoining the Thames Basin Heaths Special Protection Area (SPA), Cobbett Hill Common Special Area of Conservation (SAC) and the Ash to Brookwood Heaths Special Site of Scientific Interest (SSSI).
- 10. Except in emergencies to maintain safe site operations, which shall be notified to the County Planning Authority in writing within 7 working days of those emergency operations take place, no access is allowed onto the Thames Basin Heaths Special Protection Area (SPA), Cobbett Hill Common Special Area of Conservation (SAC) and the Ash to Brookwood Heaths Special Site of Scientific Interest (SSSI).

**Traffic and Highways**

- 11. Except in emergencies to maintain safe site operations, which shall be notified to the County Planning Authority in writing within 7 working days of those emergency operations take place, all authorised vehicles required by this permission must be in accordance with the following requirements:
  - All authorised vehicles must enter and exit the site in forward gear only
  - All authorised vehicles must be no more than 16.2 metres in length

**Dust Control**

- 12. The development hereby permitted shall be undertaken in accordance with the Litter and Dust Management Plan dated June 2017.

## Noise Control

13. All plant and machinery shall operate only in the permitted hours, except in emergency, shall be adequately maintained and silenced in accordance with the manufacturers' recommendations at all times.

Reasons:

1. For the avoidance of doubt and in the interests of proper planning.
2. To accord with the provisions of Section 91 (1) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004 and to enable the County Planning Authority to control the development and monitor the site to ensure compliance with the planning permission.
3. The imposition of a pre-commencement condition is recommended by the County Ecologist and the Surrey Wildlife Trust to safeguard the environment and local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008 during the construction phase of the proposed development.
4. The imposition of a pre-commencement condition is to secure that the applicant has to submit a detailed noise assessment, a mitigation scheme and a noise monitoring plan prior to the commencement of the development so as to safeguard the environment and local amenity in terms of noise impact and in accordance with Policy DC3 of the Surrey Waste Plan 2008.
5. The imposition of a pre-occupation operation condition is recommended by the SuDS & Consenting Team to secure that the applicant has to submit a verification report to demonstrate that the completion of works and to safeguard the environment and local amenity in terms of flooding prevention and in accordance with Policy DC3 of the Surrey Waste Plan 2008.
6. The imposition of a pre-occupation operation condition is to secure that the applicant has to provide adequate signage to provide a clear display on the agreed turning arrangement so as to safeguard the environment and local amenity in terms of traffic and in accordance with Policy DC3 of the Surrey Waste Plan 2008.
7. To enable the County Planning Authority to control the development as it is adjacent to the sensitive ecological areas and to ensure that the development is undertaken to safeguard the environment and local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.
8. To enable the County Planning Authority to control the development and to ensure that the development is undertaken in accordance with Policy DC3 of the Surrey Waste Plan 2008 so as to safeguard the environment and local amenity.
9. To enable the County Planning Authority to control the development and to ensure that the development is undertaken in accordance with Policy DC3 of the Surrey Waste Plan 2008 so as to safeguard the environment and local amenity.

10. To enable the County Planning Authority to control the development and to ensure that the development is undertaken in accordance with Policy DC3 of the Surrey Waste Plan 2008 so as to safeguard the environment and local amenity.
11. To enable the County Planning Authority to control the development and to ensure that the development is undertaken to safeguard the environment and local amenity in terms of traffic and in accordance with Policy DC3 of the Surrey Waste Plan 2008.
12. To enable the County Planning Authority to control the development and to ensure that the development is undertaken to safeguard the environment and local amenity in terms of air quality and dust impact and in accordance with Policy DC3 of the Surrey Waste Plan 2008.
13. To enable the County Planning Authority to control the development and to ensure that the development is undertaken to safeguard the environment and local amenity in terms of noise impact and in accordance with Policy DC3 of the Surrey Waste Plan 2008.

Informative:

1. The applicant is reminded that any toxic or otherwise environmentally damaging materials such as hydrocarbons, concrete or acids must be contained within an impermeable bund which will contain any accidental spillages or leakages.
2. The applicant is reminded that all authorised vehicles must enter the site by turning left from Cobbett Hill road and exit by turning right onto Cobbett Hill Road. All authorised vehicle also must access the site via the A323 and A324 only, no vehicles are allowed to use Foreman Road or White Lane to access the site, nor shall any vehicles turn right onto Pirbright Road from Cobbett Hill Road.
3. The applicant is reminded that all authorised vehicles should be fitted with broadband reversing alarms and in accordance with the requirements under the valid Vehicle Operator Licence granted by the Central Licensing Office.
4. In determining this application the County Planning Authority has worked positively and proactively with the applicant by: entering into pre-application discussions; scoping of the application; assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its accompanying technical guidance and European Regulations providing feedback to the applicant where appropriate. Further, the County Planning Authority has: identified all material considerations; forwarded consultation responses to the applicant; considered representations from interested parties; liaised with consultees and the applicant to resolve identified issues; and determined the application within the timeframe agreed with the applicant. Issues of concern have been raised with the applicant including impacts of and on ecology and biodiversity, air quality and dust, noise, lighting, groundwater protection and flooding prevention, traffic and highways and Green Belt and addressed through negotiation and acceptable amendments to the proposals. This approach has been in accordance with the requirements of paragraphs 186-187 of the National Planning Policy Framework 2012.

---

**CONTACT**

Jeffrey Ng

**TEL. NO.**

020 8541 8095

---

**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**

Planning Practice Guidance  
National Planning Policy Framework 2012  
Waste Management Plan for England 2013  
National Planning Policy for Waste 2014  
Natural Environment and Rural Communities Act 2006

**The Development Plan**

Surrey Waste Plan 2008  
Guildford Borough Local Plan 2003  
Guildford Borough Proposed Submission Local Plan 2017: strategy and sites

**Other Documents**

Suggested Stages of Alternative Site Assessment and information sources