

To: Planning & Regulatory Committee

Date: 23 March 2022

By: Planning Development Manager

District(s) Waverley Borough Council

Electoral Division(s):
Waverley Eastern Villages
Mr Deanus

Case Officer:
David Maxwell

Purpose: For Decision

Grid Ref: 499088 135449

Title: Minerals and Waste Application WA/2021/0286

Summary Report

Land at Chiddingfold Storage Depot, Chiddingfold Road, Dunsfold, Surrey GU8 4PB

Change of use of north-western end of Building A from document storage (Class B8) to storage of automotive parts, processing of catalytic converters and clutches and the creation of extended hardstanding area and erection of retaining wall (part retrospective).

Chiddingfold Storage Depot is situated in countryside beyond the Green Belt around 2.9km east of Chiddingfold and 1.7km south-west of Dunsfold in south-west Surrey. It is made up of two separate planning units each accessed independently off Chiddingfold Road. The north-western third of the storage depot falls within Use Class B8 (storage and distribution) and comprises the application site which extends to 0.42 hectares. The south-eastern two-thirds of the storage depot measure some 0.68 hectares and are in active waste management use (sui generis).

The applicant is seeking to create a new single planning unit for the site for waste development. To achieve this, the application proposes the change of use of the north-western third of Building A from document storage to provide an additional storage and processing area for the storage of automotive parts and the processing of catalytic converters and clutches. Processing activities will involve the operation of 3 x de-canning machines and one 1 x ball mill.

In addition, retrospective permission is sought for operational development carried out between August and October 2019 comprising the laying of 1,000 square m of concrete hardstanding and the development of approximately 70 m of retaining wall up to 4.2 feet in height. The hardstanding was constructed to improve the operational efficiency of the site and the retaining wall was developed on the north-west and south-western edge of the hardstanding to retain the soil levels within the adjoining woodland. Part of the drainage system has already been installed in the form of a piped network beneath the new area of hardstanding.

The area is semi-rural in character and contains a scattering of residential dwellings, the nearest being 50 and 110 m to the north of the application site respectively. A small-scale wood and green waste processing and storage facility is being developed to the east of the application site on land adjacent to Wetwood Cottage which is on the opposite side of Chiddingfold Road.

The application site lies within an Area of Great Landscape Value (AGLV) and 560 m to the east of the Surrey Hills Area of Outstanding Natural Beauty. Except for the north-east boundary fronting Chiddingfold Road, which is partly screened by a line of deciduous trees (subject to Tree Preservation Orders) and hedgerow, the application site is surrounded by woodland. The north-west boundary of the application site abuts an area of woodland, beyond which, around 10 m from the site boundary, is the Birchen Copes Ancient Semi Natural Woodland. This includes the Chiddingfold Forest Site of Special Scientific Interest (SSSI) which is situated 25 m from the north-west boundary of the application site. The application site does not lie within or adjacent to an Air Quality Management Area and is situated within Flood Zone 1 which has a low probability of flooding.

The hours of operation would be the same as those that currently apply to the existing waste facility. No changes are proposed to the site access arrangements. The number of employees would increase from 8 to 10 following the proposed change of use resulting in a daily increase in the number of cars from 8 to 9 with one employee arriving by motor bike. The change of use would result in an increase in the number of HGV movements from 4 to 12 per month.

Waverley Borough Council has raised no objection to the application and has drawn attention to Dunsfold Parish Council's suggestion of a condition to restrict the permitted number of tips of metallic waste into the waste recycling skips. Six objections have been received from local residents with the impact on noise being the primary matter of concern. These concerns have been addressed by the applicant following amendments made to the application which have removed the proposals to relocate the metallic waste tipping operation into the application site, add an additional waste recycling skip, increase the number of daily tips currently permitted and amend the hours when tipping can take place. Subsequently, one local resident and the local county councillor have written in to express their support for these changes.

Having assessed the application, Officers consider that the proposal is in accordance with the principles of sustainable waste management. It would support the achievement of net-self sufficiency in the management of Surrey's waste by increasing waste management capacity within the county. It would facilitate the recycling, recovery and preparation for reuse of automotive parts in accordance with the objectives of the waste hierarchy. The proposal would also help an existing rural business to expand in accordance with the National Planning Policy Framework 2021. The County Highway Authority (CHA) has assessed the application on highway safety, capacity and policy grounds and advised that the proposal is unlikely to have a material impact on highway safety issues subject to a condition to ensure that maximum visibility splays are achieved at all times.

The application has been reviewed by a number of consultees including those providing specialist environmental technical advice including in respect of noise, the water environment, landscape and visual impact, ecology and biodiversity. These consultees have all found the application to be acceptable subject to the imposition of planning conditions where necessary.

Taking the above considerations into account, Officers are satisfied that the proposed development is acceptable and complies with national planning policy and local development

plan policy requirements subject to the imposition of conditions to control the impact of the development on local amenity and the environment.

The recommendation is to PERMIT subject to conditions.

Application details

Applicant

2RB Limited

Date application valid

23 February 2021

Period for Determination

25 May 2021 (Extension of time agreed until 6 April 2022)

Amending Documents

- Email dated 7 September 2021 entitled, "SCC Ref 2020/0154 - Land at Chiddingfold Storage Depot, Chiddingfold Road, Dunsfold, Surrey GU8 4PB"
- Industrial Noise Impact Assessment Ref SA - 6377/2 dated July 2020, submitted 7 September 2021
- Email dated 8 October 2021 entitled, "RE: Land at Chiddingfold Storage Depot - SCC Noise Consultants Response"
- Email dated 20 October 2021 entitled, "RE: Land at Chiddingfold Storage Depot - SCC Noise Consultants Response"
- Industrial Noise Impact Assessment, Ref: SA - 6377/3 dated October 2020, submitted 20 October 2021
- Email dated 29 October 2021 entitled, "RE: Tipping Method Demonstration"
- Email dated 2 December 2021 entitled "SCC Ref 2020/0154 - Land at Chiddingfold Storage Depot, Chiddingfold Road, Dunsfold, Surrey GU8 4PB"
- Email dated 20 December 2021 entitled, "RE: SCC Ref 2020/0154 - Land at Chiddingfold Storage Depot, Chiddingfold Road, Dunsfold, Surrey GU8 4PB"
- Drawing No: 0801 - SK20-01 Rev D Proposed Retaining Wall and Hard Standing Dated December 2021
- Email dated 10 January 2022 entitled, "RE: SCC Ref 2020/0154 - Land at Chiddingfold Storage Depot, Chiddingfold Road, Dunsfold, Surrey GU8 4PB"
- Email dated 09 February 2022 entitled, "RE: QUESTIONS Re Chiddingfold Storage Depot;
- Email dated 09 February 2022 entitled, "RE: Chiddingfold Storage Depot – Noise Comments"

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.

	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the report where this has been discussed
Waste Management	Yes	50-66
Highways, Traffic and Access	Yes	67-77
Noise	Yes	78-89

Water Environment	Yes	90-103
Landscape and Visual Impact	Yes	104-118
Ecology and Biodiversity	Yes	119-143
Public Amenity	Yes	144-145
Community Engagement	Yes	146-148

Illustrative material

Site Plan

Plan 1 - Site Location and Application Site Area

Aerial Photographs

Aerial 1 - Surrounding Area

Aerial 2 - Application Site

Plans and Drawings

Drawing ref: 0801 - SK20-01 Rev D Proposed Retaining Wall and Hardstanding December 2021

Site Photographs

Figure 1 - Main Site Entrance off Chiddingfold Road Looking North-West

Figure 2 - Secondary Entrance off Chiddingfold Road Serving Existing Document Storage Area

Figure 3 - View of North-Western Façade of Building A from Secondary Entrance

Figure 4 - View of Extended Yard Area Looking South-East

Figure 5 - View of Extended Yard Area Looking North-West

Figure 6 - View of Retaining Wall along South-West Boundary

Figure 7 - Storage of Automotive Vehicle Parts within Building A

Figure 8 - Skips for Tipping of Metallic Waste to the Rear of Building B

Background

Site Description

1. Chiddingfold Storage Depot is situated in countryside beyond the Green Belt approximately 2.9km east of Chiddingfold and around 1.7km south-west of Dunsfold. It lies on the south-west side of Chiddingfold Road which connects Dunsfold to the north-east with Chiddingfold to the west.
2. The wider site includes a larger building (Building A), which has been extended to the rear along part of its south-western elevation, a smaller building (Building B), an open concreted yard area, four external storage containers and three roll-on roll-off waste recycling skips. Apart from some extensions to Building A, the depot has been in existence in its current form for many decades. It has previously been used to house munitions during World War II, and subsequently for storage and distribution purposes up until 2013 when the larger part of the site was granted planning permission for waste related development.
3. Building A, including its rear extension, occupies an area of approximately 3,550 square m (sq m). The original building has a flat roof and is around 7.5m in height, 84m in length and 32m wide. The walls are 400mm solid brick, the roof is 400 to 500mm solid concrete and the doors are 400mm solid steel rail operated. There are some high-level windows which face away from residents. The north-west third of

Building A is used for document storage (Class B8) by Formex Archive Services Limited. This occupies an area of 207 sq m of floorspace and is unconnected to the waste use taking place elsewhere within the building and the wider site.

4. The south-eastern two-thirds of Building A are used to sort, catalogue and store discarded and refurbished automotive parts such as clutches, turbo chargers, air conditioning units, steering racks / pumps, electronic components and gear boxes. These parts are received, catalogued, stored and then distributed to customers who re-manufacture the parts for re-use. The building houses a number of ancillary offices, technical, and staff-welfare facilities. It also contains 179 sq m of internal mezzanine flooring and a small converted two-storey boiler room measuring 68 sq m. This room protrudes from the south-eastern façade of the building and is used for ancillary office accommodation.
5. The rear extension to the south-west of Building A is 48m long, 17m wide and 8.58m in height. It is used for the storage and processing of catalytic converters. It includes a two-storey element measuring 7.26m in and 3.89m wide. This provides additional office accommodation and a platform from which to oversee activities in the open yard. A single storey extension to the south-western façade of the office extension to Building A has also been developed measuring 5m in width by 7m in length. This building is used to accommodate a landscape maintenance store. Building B is situated to the south-east of Building A. It occupies an area of 220 sq m and is dedicated to clutch reprocessing activities.
6. The storage depot comprises two separate planning units each accessed independently from gated entrances off Chiddingfold Road. This first comprises the south-eastern two-thirds of the site which is used for the importation, deposit and storage of discarded automotive parts and the processing of discarded catalytic converters and clutches. This use is served by the main gated access to the site from Chiddingfold Road which is positioned between Buildings A and B. The second planning unit comprises the north-western third of the site which is used for document storage. This use is served by a secondary gated access off Chiddingfold Road situated around 120m to the north-west of the main access point.
7. The large open concrete yard areas are used for vehicle parking, the turning of heavy goods vehicles (HGVs), waste storage in skips and ancillary storage in the open. Four existing storage containers are situated along the south-east boundary of the depot. Three waste recycling skips are situated to the rear of Building B and are used for the tipping of metallic waste.
8. The application site primarily comprises the north-western third of the storage depot and covers an area of 0.42 hectares. The site area comprises: the north-western third of Building A currently used for document storage as well as the yard area that surrounds this part of the building; a very narrow strip of land which runs parallel and along the length of the south-western façade of the office extension to Building A; and part of the adjoining woodland. A small area of the application site overlaps with the permitted waste use. A soil embankment is situated along the south-west boundary of the application site beyond which lies an area of woodland.
9. Surrounding woodland effectively screens the wider site from views from the south, west, north-west and south-east. Views are available from Chiddingfold Road. This boundary is formed of palisade fencing, security access gates and mature hedgerows and deciduous trees. These mainly broadleaved trees are protected by Tree Preservation Orders (TPO) and partly screen views of Building A, particularly when they are in full leaf.

10. The surrounding area comprises woodland, open countryside and isolated dwelling houses. The closest residential receptors to the application site boundary comprise Woodside Cottage (designated by Waverley Borough Council as a building of Local Merit) and Wetwood Rough located around 50 and 110m to the north respectively. Larchwood is situated approximately 115m to the south-east on the same side of Chiddingfold Road as the storage depot and is separated from the application site by a block of woodland, and a yard area at the south-eastern end of the storage depot. Wetwood Cottage and Millmead Cottage are located around 120 and 127m to the south-east respectively on the opposite side of Chiddingfold Road. There are further residential properties clustered around the junction of Chiddingfold Road with Plaistow Road and Wrotham Hill / Dunsfold Common Road some 1km towards the east.
11. To the east of the application site on the opposite side of Chiddingfold Road, a small-scale wood and green waste processing and storage facility is being developed on land adjacent to Wetwood Cottage. Several large agricultural sheds associated with Wetwood Farm are situated about 140m to the east of the application site beyond Wetwood and Millmead cottages.
12. The application site is located within an Area of Great Landscape Value (AGLV) and around 560m west of the boundary of the Surrey Hills Area of Outstanding Beauty (AONB). The site is not located within or adjacent to an Air Quality Management Area (AQMA) with the nearest AQMA being located 5.3 miles to the north in Godalming. The proposed development abuts an area of woodland to the north-west, beyond which is the Birchen Copse Ancient Semi Natural Woodland. Birchen Copse includes the Chiddingfold Forest Site of Special Scientific Interest (SSSI) which lies 25m from the application site boundary.
13. The closest Site of Nature Conservation Importance (SNCI), Botany Bay to Durfold Wood SNCI is situated around 505m to the south. The nearest Listed Building is Redwood House which is Grade II listed and located approximately 470m to the west. An Area of High Archaeological Potential (AHAP) and a County Site of Archaeological Importance (CSAI) are located 400 and 440m to the south-east respectively.

Planning History

14. On 10 January 1980, planning permission ref: WA/79/1960 was granted for the use of the site for the storage of fertilisers and animal feed stuffs. Due to the description of the development permitted, Officers considered that this allow the land to be used for Use Class B8 (storage or distribution).
15. Planning permission ref: WA/2013/1223 was granted in October 2013 for the importation, deposit, storage and transfer of discarded automotive parts (class B8), the importation, deposit, storage and processing of discarded catalytic converters, external alterations to the former boiler room, additional vehicle parking spaces and the installation of passive infrared lighting.
16. In April 2014, the County Planning Authority (CPA) approved details (ref: WA/2014/0056) of a scheme for the parking and turning of vehicles, a delivery management plan and a scheme for the repair and maintenance of the concrete yard surface.
17. Planning permission ref: WA/2014/0939 was granted in March 2015 for the retention of 4 containers for storage purposes in connection with the existing waste facility.

18. In March 2015, planning permission ref: WA/2014/0863 was granted for an amendment to Condition 3 and the removal of Condition 8 of planning permission ref: WA/2013/1223.
 19. Planning permission ref: WA/2017/2144 was granted in May 2018 for an extension to the principal building (Building A) to provide additional storage and processing areas, the change of use of the site to include the reprocessing of clutches in Building B, the re-siting of 4 containers and the erection of a landscape machinery store.
 20. In September 2018, a non-material amendment (ref: WA/2018/1393) to planning permission ref: WA/2017/2144 was approved to narrow the width of the two-storey office extension to Building A from 4.65 to 3.89m and to increase its length from 4.65 to 7.26m.
 21. A further non-material amendment (ref: WA/2018/1865) to planning permission ref: WA/2017/ 2144 was approved in November 2018 for the removal of the landscape maintenance store from the site and the development of a single storey extension to the approved two storey office extension to Building A measuring 5m by 7m.
 22. Planning permission ref: WA/2019/0155 was granted in May 2019 for the provision of a package treatment plant to facilitate the management of sewage at the waste facility.
 23. Details were approved for a Scheme of Bat and Bird Box Provision and Maintenance (ref: WA/2018/1878), a Noise Monitoring Scheme (ref: WA/2019/0368) a Drainage Strategy (ref: WA/2019/1501) and a SuDS Verification Report (ref: WA/2021/0277) in December 2018, July 2019, November 2019 and August 2021 respectively.
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The Proposal

24. The applicant is seeking to create a new single planning unit for the site for waste development. In order to achieve this, the proposal is seeking to change the use of the north-western third of the site, including the north-western third of Building A, from document storage (Class B8) to provide an additional storage and processing area for the storage of automotive parts and the processing of catalytic convertors and clutches. This involves a total of 207 sq m of floorspace within Building A being repurposed from document storage to the processing of catalytic convertors and clutches. Processing activities will involve the operation of 3 x de-canning machines and one 1 x ball mill. In addition, retrospective permission is sought for operational development comprising the erection of an external hardstanding area and retaining wall. As these were installed between August and October 2019, this proposal is therefore part retrospective.
25. The new area of concrete hardstanding extends to approximately 1,000 sq m between the south-western facade of Building A and the south-west boundary of the application site. Part of the drainage system has already been installed in the form of a piped network beneath the concrete hardstanding. The extended area of hardstanding was developed to improve the operational efficiency of the site and is used for the outdoor storage of items including boxes of waste prior to distribution. For security reasons, waste material delivered for processing will be unloaded and stored inside as soon as delivered.
26. The retaining wall is needed to retain the soil levels within the adjoining woodland. It comprises sectional concrete blocks stacked on a concrete foundation. It has been

sited along the south-west, west and north-western perimeter of the new area of concrete hardstanding. The retaining wall is approximately 70m in length and up to 1.28m in height. It slopes downwards from 1.28 to 0.96m along the north-western perimeter.

27. The hours of operation would be the same as those that currently apply to the existing waste facility. The application includes proposals to manage the adjoining woodland to secure the natural regeneration of trees, enhance and strengthen the tree stock and provide for biodiversity improvements. No additional external lighting is proposed.
28. Following an amendment to the application in December 2021, the new hardstanding area is no longer proposed to be used to accommodate the 3 existing roll-on roll-off waste recycling skips, used for the tipping of metallic waste and which were to be relocated from the rear of Building B to the rear of Building A, or for the siting of a 4th additional roll-on roll-off waste recycling skip. However, this still remains an aspiration of the operator. The amendment also removes the original proposal to increase the permitted number of tips of metallic waste from 3 between 1600 and 1700 hours Monday to Friday to 4 tips in any one hour between 1000 and 1600 hours Monday to Friday. The applicant has explained that this amendment was intended to simplify the planning considerations and to achieve the principal objective which is the change of use of the north-western end of Building A.

Consultations and Publicity

District Council

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| 29. | Waverley Borough Council | No objection and draw attention to the Parish Council's suggestion of a condition in relation to limiting tipping. |
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Consultees (Statutory and Non-Statutory)

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| 30. | County Highway Authority | Proposal is unlikely to have a material impact on highway safety issues subject to condition and recommends further conditions to encourage more sustainable transport choices. |
| 31. | County Noise Consultant | Recommend that the existing planning conditions are brought forward. |
| 32. | Lead Local Flood Authority | Content with the development proposed subject to conditions. |
| 33. | Thames Water | No views received. |
| 34. | County Landscape Officer | Supports a landscape condition requiring submission and approval of a landscape plan with aftercare regime including landscape enhancements and enhanced management of existing woodland if deemed necessary to achieve a biodiversity net-gain. |

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| 35. | County Ecologist | No objection. A landscaping condition should be sufficient to provide some biodiversity net-gain. |
| 36. | County Arboriculturalist | No views received. |
| 37. | Health and Safety Executive | Development does not intersect a pipeline or hazard zone so do not have an interest in the development. |
| 38. | UK Power Networks | Infrastructure plans provided do not identify any electrical utility infrastructure within the application site. |
| 39. | SGN | Infrastructure plans provided do not identify the presence of any gas utility infrastructure within the vicinity of the application site. |

Parish/Town Council and Amenity Groups

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| 40. | Dunsfold Parish Council | The number of tips into the roll on/roll off skips should only be increased from 3 to 4 per day between 1600 and 1700 hours Mondays to Fridays and from 15 to a maximum of 20 tips per week due to residents' concerns about the additional noise impact envisaged by the proposal. |
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Summary of publicity undertaken and key issues raised by public

41. The application was publicised by the posting of two site notices and an advert was placed in the local newspaper. A total of 13 owner/occupiers of neighbouring properties were directly notified by letter.
42. Six letters of representation have been received objecting to the application. A summary of the reasons provided are set out below.
- Heard from a reliable authority that Hensel Recycling are no longer relocating to the north-western end of Building A and the document storage company (Formex) are remaining in situ although the terms of their lease are not known.
 - Proposed increase in heavy goods vehicle (HGV) movements from 2 to 6 per week is excessive and any increase should be minimal.
 - Unwarranted noise impact from the proposal to increase the timing of the noisy tipping of metallic waste from 3 tips an hour between 1600 and 1700 hours to a maximum of four tips in any one hour between 1000 and 1600 hours increasing the number of tips from 15 to 120 per week and resulting in unwelcome sporadic noise throughout the day.
 - Increase in the number of tips should be limited to a maximum of 20 per week.
 - Request for a quieter method of tipping metallic waste to be found.
 - There appears to be a change of use from storage to processing.
 - Request for new drainage pipe placed on woodland adjoining Barn Cottage to be redirected as potentially toxic metals are being processed in the plant.
 - The increased need for water use at the site.
 - The recent felling of the copse on the site which appeared to be a large number of trees.

- Photograph contained in paragraph 2.01 of the Planning, Design and Access Statement is not up to date and does not show the amount of building work that has since taken place.
 - Have had formal dialogue with the operator but feel that this must be backed up formally by conditions so that any future owners have to abide by them.
43. A representation was received from a local resident, who had written in previously to object to the application, commenting that they were delighted with the favourable and very good result in respect of the amendments to the application.

Planning considerations

44. The guidance on the determination of planning applications contained in the Preamble/Agenda front sheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs.
45. In this case the statutory development plan for consideration of the application consists of the Surrey Waste Local Plan 2020 (SWLP), the Waverley Borough Local Plan Part 1: Strategic Policies and Sites 2018 (LPP1) and the 'saved' policies contained within the Waverley Borough Local Plan 2002 (WBLP). The County Planning Authority (CPA) are in the process of preparing a new Minerals and Waste Local Plan (MWLP) for Surrey which will replace the existing Surrey Minerals Plan 2011 and SWLP 2020. The MWLP remains at an early stage of preparation and the Issues and Options document was published for consultation between 15 November 2021 and 7 March 2022.
46. The Borough Council are in the process of preparing the Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies (LPP2). The LPP2 was submitted to the Secretary of State for Examination in December 2021. As the plan has not been subject to public examination, it is considered that limited weight can be attributed to the draft policies contained within the emerging plan. Once the LPP2 has been adopted, the WBLP will be replaced by the LPP1 and LPP2.
47. Dunsfold Parish Council have commenced work on the preparation of a Neighbourhood Plan after their application to designate the parish of Dunsfold as a Neighbourhood Area was approved by the Borough Council on 2 August 2017. The application site is located within this Neighbourhood Area in its entirety. Work on the preparation of a draft plan for consultation remains ongoing.
48. The CPA has considered the need for the application to be supported by an Environmental Impact Assessment (EIA) and has adopted an EIA Screening Opinion. This concluded that given the scale and nature of the application, the proposed development does not require an EIA.
49. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations which include the National Planning Policy Framework 2021 (NPPF), National Planning Policy for Waste 2014 (NPPW) and National Planning Policy Guidance (nPPG) last updated in June 2021. 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 sustainable waste management, highways, traffic and access, noise, water environment, landscape and visual impact, ecology and biodiversity, amenity and public engagement.

Waste Management

Surrey Waste Local Plan 2020

Policy 1: Need for Waste Development

Policy 2: Recycling and Recovery (other than inert C,D&E waste and soil recycling facilities)

Policy 8: Improvement or Extension of Existing Facilities

Policy 10: Areas Suitable for Development of Waste Management Facilities

50. NPPF paragraph 7 explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 sets out that there are three dimensions to sustainable development which the planning system can help to achieve: economic, social and environmental. The economic objective includes the need to help build a strong, responsive and competitive economy and the environmental objective involves the prudent use of natural resources and the minimisation of waste and pollution. NPPF paragraph 84 promotes the sustainable growth and expansion of all types of business in rural areas, and the development and diversification of agricultural and other land-based rural businesses in order to support a prosperous rural economy.
51. Paragraph 1 of the NPPW states that positive planning plays a pivotal role in delivering this country's waste ambitions including through: delivery of sustainable development and resource efficiency, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy; and, helping to secure waste re-use, recovery or disposal without endangering human health or harming the environment.
52. NPPW paragraph 4 promotes the identification of sites for waste development in local plans which: provide opportunities to co-locate waste facilities together and with complementary activities; and give priority to the re-use of previously developed land and sites identified for employment uses. Paragraph 7 states that when determining planning applications, waste planning authorities should, amongst other matters, only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan.
53. The Waste Framework Directive (WFD), as amended, sets requirements for the collection, transport, recovery and disposal of waste. The WFD includes a requirement to apply the 'waste hierarchy' when planning for waste management. The waste hierarchy is a system of prioritising the different ways in which waste can be managed with the most sustainable method, prevention, at the top of the hierarchy followed by preparing for reuse, recycling, other recovery¹, with the least sustainable method, disposal, at the bottom. In terms of targets, page 35 of the Waste Management Plan for England (January 2021) states that for end-of-life vehicles (ELVs), there is a 95% reuse, recycling and recovery requirement.
54. The vision for the SWLP is composed of 5 key elements that reflect national planning policy. These elements include net self-sufficiency and sustainable waste management (waste hierarchy). The SWLP Spatial Strategy states that Surrey has a need for additional waste management capacity. It explains that factors that can

¹ Processing of wastes into materials to be used as fuels or for backfilling.

provide for this need include appropriate extensions and enhancements to existing facilities. Sites identified for employment uses and industrial and storage purposes are seen as areas potentially suitable for waste development. Previously developed land and sites identified for employment uses are included amongst the types of land uses prioritised for waste use as well as land not in the Green Belt.

55. SWLP Policy 1 states that planning permission will be granted for the development of new waste facilities that contribute to achieving targets for recycling, recovery and the diversion of waste from disposal in a manner that does not prevent management of the waste at the highest point practical in the waste hierarchy. Policy 2 states that planning permission for the development of recycling or recovery facilities will be granted where the site is suitable when assessed against Policy 10 and other policies in the Plan. The policy also supports the co-location of such activities with other waste and non-waste development where it can be demonstrated that there are benefits from the co-location which may include more efficient production, in terms of quantity or quality, of recyclate and waste derived fuels and fewer lorry movements.
56. Policy 8 of the SWLP states that planning permission for the improvement or extension of existing waste management facilities will be granted where: any change to the type and/or quantity of waste managed is consistent with the Plan's requirements for the management of waste and that the quantity of waste to be managed is equal to or greater than the quantity of waste currently managed on site; benefits to the environment and local amenity will result; and the improvement or extension of a recycling and recovery facility is consistent with Policy 2. SWLP Policy 10 states that planning permission will be granted for the development of waste facilities on land identified for employment uses or industrial and storage purposes, land considered to be previously developed and land otherwise suitable for waste development when assessed against other policies in the Plan.
57. The Planning, Design and Access Statement (Planning Statement) sets out that the applicants, 2RB Ltd (formerly Refine Metals Ltd) are the leaders in purchasing and processing of catalytic converters. Their business also includes Auto Parts UK Limited who specialise in the supply of automotive parts used in remanufacturing processes off-site and Fleetway Clutches Limited who are leading experts in clutch reprocessing. The application is intended to enable Hensel Recycling, who are currently based in Slinfold (west of Horsham), to relocate into the north-western third of Building A for the purposes of the processing of catalytic converters.
58. The applicant states that the proposal would enable the company to continue to provide a much needed source of local employment in this rural area and help an existing business to expand. In terms of the number of employees, the Transport Statement explains that 8 staff are employed by the existing document storage company and 10 staff members will be employed as a result of the proposed change of use. Officers consider that the proposal would make a small contribution towards the economic dimension of sustainable development set out in the NPPF.
59. The application would provide an additional storage and processing area for the storage of automotive parts and the processing of catalytic converters and clutches. These activities involve the cataloguing and transfer of tens of thousands of discarded automotive parts for reconditioning / re-use or disposal off-site every year, the recovery of precious metals from some 500 tonnes of discarded catalytic converters per annum and the reprocessing of worn-out clutches prior to dispatch. As discarded automotive parts comprise scrap metal, it is considered likely that a significant proportion would be likely to be recycled with only a small fraction being disposed.

60. Officers accept that the application accords with the NPPF in respect of supporting the environmental dimension of sustainable development and promoting a prosperous rural economy. The application would comply with the NPPW by supporting the principle of positive planning and contribute to the target for the reuse, recycling and recovery of ELVs contained in the Waste Management Plan for England.
61. In accordance with the SWLP Vision and Spatial Strategy, the application would support the achievement of net self-sufficiency in the management of Surrey's waste. It would also result in the provision of additional waste management capacity on previously developed land in accordance with NPPW and SWLP Policy 10.
62. The application comprises an extension to an existing waste facility. It would promote the re-use, recycling and recovery of waste and the diversion of waste from disposal at the highest point practical in the waste hierarchy by supporting the preparation of materials for reuse in accordance with SWLP Policy 1. The relocation of Hensel Recycling's catalytic converter processing business to Chiddingfold Storage Depot would result in the co-location of the company with other similar specialist waste management facilities. This is considered likely to result in a more efficient operation and increase the quantity of recycled materials produced at the site in accordance with SWLP Policy 2. In accordance with SWLP Policy 8, the proposal would extend an existing waste facility and increase the quantity of waste managed at the site in accordance with the SWLP's requirements for waste management.
63. Officers accept that the extended area of hardstanding would improve the operational efficiency of the site. It is considered that the smoother surface would be easier to clean, reduce any limited potential for dust during periods of warm dry weather and reduce noise from vehicles traversing over the surface.
64. The Borough Council has raised no objection to the application. A representation has been received claiming that Hensel Recycling are no longer proposing to relocate to the application site although no evidence has been provided to support this. In response to this claim, the applicant has clarified that it is still proposed that Hensel Recycling relocates to Building A.
65. In view of the above assessment, it is considered that the proposed change of use would enable a local business to expand helping to improve the efficiency of the business, support the local economy, make effective use of previously developed land and increase waste management capacity at the site in a manner consistent with national policy requirements and the local development plan.

Conclusion

66. In view of the above considerations, the application is considered to be consistent with the principles of positive planning and sustainable waste management and supports the objectives of the waste hierarchy and the achievement of net self-sufficiency in the management of Surrey's waste in accordance with the requirements of the NPPF, NPPW, WFD and SWLP Policies 1, 2, 8 and 10.

Highways, Traffic and Access

Surrey Waste Local Plan 2020

Policy 14: Protecting Communities and the Environment

Policy 15: Transport and Connectivity

Waverley Local Plan Part 1 2018

Policy ST1: Sustainable Transport

Waverley Local Plan 2002

'Saved' Policy D1: Environmental Implications of Development

'Saved' Policy M5: Provision for Cyclists

'Saved' Policy M13: Heavy Goods Vehicles

67. NPPF paragraph 110 seeks to ensure that: appropriate opportunities to promote sustainable transport modes have been taken; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Paragraph 112 sets out that development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. Paragraph 108 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
68. SWLP Policy 15 promotes waste development where transport links are adequate to serve the development or can be improved to an appropriate standard. Where the need for road transport has been demonstrated, the policy seeks to ensure: waste is transported using the best roads available; the distance and number of movements are minimised; cumulative impacts on the road network will not be severe; there is safe and adequate means of access and vehicle movements will not have an unacceptable impact on highway safety; satisfactory provision is made to allow for safe vehicle turning and parking, manoeuvring, loading, and electric charging; and low or zero emission vehicles are used. Policy 14 of the SWLP supports development that will not result in unacceptable impacts on communities and the environment in respect of public amenity and safety including impacts caused by noise, dust, fumes and vibration.
69. LPP1 Policy ST1 states, relevant to this proposal, that the Council will work to ensure that development schemes: are located where opportunities for sustainable transport modes can be maximised reflecting the amount of movement generated, the nature and location of the site and recognising that solutions and measures will vary from urban to rural locations; give priority to the needs of pedestrians, cyclists, public transport users, car sharers and users of low and ultra-low emission vehicles; and include measures to encourage non-car use such as on-site cycle parking.
70. 'Saved' WBLP Policy D1 states that development will not be permitted where it would result in levels of traffic which are incompatible with the local highway network or cause significant environmental harm by virtue of noise and disturbance. 'Saved' Policy M5 requires new development to provide cycle parking facilities and 'saved' Policy M13 seek to minimise the adverse impact of lorry traffic.
71. The application site would be accessed off Chiddingfold Road via the secondary access to the storage depot. Chiddingfold Road is a 'C' classified two-way single carriageway road with a 60mph speed limit. It provides access to Dunsfold village to the north-east of the site via Wrotham Hill, and to Chiddingfold village to the west via High Street Green. More widely, the site is located between the A283 to the west and the A281 to the east which in turn connect to the wider strategic road network. No changes are proposed to existing site access arrangements.
72. The applicant has submitted a Transport Statement in support of the development. This explains that the current occupier, Formex Archive Services Limited, operate with four vans providing deliveries to the site 10 times per month, with two HGV collections a month. This equates to 24 movements per month comprising 20 light van

movements and 4 HGV movements. The proposed change of use will attract around 10 customer deliveries per month using small transit vehicles and six HGVs. This equates to 32 movements per month comprising 20 small transit vehicle movements and 12 HGV movements. The proposal would therefore result in an additional 8 HGV movements per month. The applicant argues that this would not result in a significant difference to the existing operation.

73. The number of employees would increase from 8 to 10 resulting in a daily increase in the number of cars from 8 to 9 with one employee arriving by motor bike. The applicant considers that this small increase in movements associated with the changes in staff would not have a material impact on the site access or surrounding highway network.
74. The proposal has been considered by the County Highway Authority (CHA) who have assessed the application on highway safety, capacity and policy grounds. The CHA consider that the proposal is unlikely to have a material impact on highway safety issues subject to the imposition of a pre-commencement condition to ensure that maximum visibility splays are achieved at all times and any overgrown vegetation is maintained by the applicant. Conditions have also been recommended by the CHA in respect of the provision of facilities for the secure, covered parking for bicycles and at least 10% of available parking spaces being provided with a fast charge socket and a further 10% being provided with a power supply for fast charge sockets for future use.
75. A representation has been received objecting to the application as the increase in HGV movements is considered excessive. Officers are satisfied that eight additional HGV movements per month would be compatible with the local highway network and not have an unacceptable impact on highway safety given that this would equate to around one additional HGV movement every four days on average. Neither is this considered likely to cause significant environmental harm from noise and disturbance, result in unacceptable impacts on public amenity and safety or have a severe cumulative traffic impact. In this respect, Officers have considered the combined impact of 17 vehicular movements per day associated with the small-scale wood and green waste processing and storage facility on land adjacent to Wetwood Cottage situated on the opposite side of Chiddingfold Road. In this respect, Officers are mindful that the green waste facility would only contribute to a slight net-increase in terms of vehicle movements.
76. As the application is part retrospective, the proposed pre-commencement condition recommended by the CHA in relation to the achievement of visibility splays could not be imposed in this case. Consequently, Officers consider that the condition should be reworded to apply prior to the commencement of waste operations associate with the proposed change of use. The proposed conditions requiring the provision of facilities for cyclists and electric car users would help to encourage more sustainable transport choices in accordance with development plan policy.

Conclusion

77. In view of the small number of additional HGV movements that would be generated by the proposal and the advice provided by the CHA, Officers are satisfied that the proposal would not cause significant harm in terms of highways, traffic and access and meets the requirements of national and local plan policies subject to conditions to ensure that visibility splays are achieved and to encourage more sustainable transport choices.

Environment and Amenity

Surrey Waste Local Plan 2020

Policy 13: Sustainable Design

Policy 14: Protecting Communities & the Environment

Policy 16: Community Engagement

Waverley Local Plan Part 1 2018

Policy RE1: Countryside beyond the Green Belt

Policy RE3: Landscape Character

Policy NE1: Biodiversity and Geological Conservation

Policy CC1: Climate Change

Policy CC4: Flood Risk Management

Waverley Local Plan Part 2 Pre-Submission Document 2020

Policy DM1: Environmental Implications of Development

Waverley Borough Local Plan 2002

Policy D1: Environmental Implications of Development

Policy D2: Compatibility of Uses

Policy D7: Trees, Hedgerows and Development

Policy C7: Trees, Woodlands and Hedgerows

Noise

78. NPPF paragraph 174 states that planning decisions should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution. Paragraph 185 adds that planning decisions should ensure that new development is appropriate for its location, mitigate, and reduce to a minimum, potential adverse impacts resulting from noise from new development, and avoid noise giving rise to significant adverse impacts on health and quality of life.
79. SWLP Policy 14 requires that waste development does not result in unacceptable impacts on communities and the environment including in relation to public amenity and safety in respect of impacts caused by noise. 'Saved' WBLP Policy D1 states that development will not be permitted where it would result in material detriment to the environment by virtue of loss of general amenity, including disturbance resulting from the emission of noise or vibration. WBLP 'saved' Policy D2 seeks to ensure that proposed and existing land uses are compatible and that development which may have a materially detrimental impact on sensitive uses with regard to environmental disturbance or pollution will not be permitted. Draft LPP2 Policy DM1 states that development should avoid harm to the health or amenity of occupants of nearby land and buildings, and future occupants of the development, including by way of an unacceptable increase in noise.
80. An Industrial Noise Impact Assessment was submitted in support of the application. This assesses whether the proposals, in combination with existing waste activities outside the application site boundary, would have a demonstrable adverse effect in terms of noise that outweigh the benefits of the development. The assessment is based on a worst case scenario. It takes into account noise levels associated with the initial proposal to relocate the metallic waste tipping operation into the application site although this no longer forms part of the proposal.
81. Background noise levels of 44dB were derived from an earlier survey undertaken by the applicant's acoustic consultants in April 2018. These were considered by the applicant to be more representative of the actual level of background noise levels in the immediate vicinity of the site. This was because a COVID-19 lockdown was in place in April 2020 when the acoustic consultants undertook their noise survey and recorded a lowest background noise level of 40dB between 0700 and 2300 hours.

Consequently, a background noise level of 44dB at the nearest sensitive receptor was seen as being more representative for the local area between 0700 and 2300 hours for the purposes of the assessment.

82. The assessment found that the proposed development would result in a noise level of 43dB at the nearest sensitive receptor following the inclusion of a plus 3dB penalty to allow for any tonal elements and a further plus 3dB penalty to allow for any impulsive elements that may be present from the proposed plant. This indicates that a low impact could be expected from the proposed development. The assessment therefore concludes that any noise generated by the development will be below background levels at the main sensitive receptor points, will have a low impact on existing residents and will not result in unacceptable disturbance.
83. Following the amendments to the application, the applicant has confirmed that the technical content of the noise assessment remains accurate in respect of the new proposed changes, the conclusions contained within the report continue to reflect the acoustic environment that the proposal will have on the local residents, and the conclusion that the development will have a low impact at the nearest noise sensitive premises remains unchanged.
84. To reduce the noise impact of waste processing operations in the north-west third of Building A, the noise assessment recommends the imposition of a condition requiring that the high levels windows in Building A are either secondary glazed with 10mm laminated glass set back at least 100mm or bricked up. This recommendation is accepted by Officers as the noise assessment takes this attenuation measure into account as part of its noise calculations. In the interests of protecting the amenity of local residents, Officer also consider it necessary to impose a condition requiring the doors on the north-western façade of Building A to be kept closed at all times when waste processing operations are taken place within the north-west third of the building. This would mirror an existing condition relating to Building B to the south-east of the application site.
85. The County Noise Consultant (CNC) accepts the use of the earlier April 2018 noise survey data to establish background noise levels. The CNC has advised that if the County Council is mindful to grant consent, the whole site should operate under one set of compiled conditions, with an additional condition to control the number of tips permitted per hour, in order to protect residential amenity and other noise sensitive facilities or areas. The CNC has therefore advised that the existing noise conditions under planning permission (ref: WA/2017/2144) can be brought forward.
86. Officers consider that an additional condition to control the number of tips permitted per hour is not required or justifiable in this case. This is because Condition 14 of planning permission ref: WA/2014/0863 already controls the number of tips to no more than 3 per hour between the hours of 1600 and 1700 hours Mondays to Fridays. Further, the tipping operation will remain in its existing location which lies outside the boundary of the application site. Otherwise, Officers accept the CNC's advice to bring the existing noise conditions forward. This will ensure that the whole site operates under one set of noise conditions.
87. The Borough Council has raised no objection to the application. Together with the local county councillor, they have drawn attention to Dunsfold Parish Council's suggestion that a condition should be imposed to limit the tipping of metallic waste. Objections have been received from local residents raising concerns about the proposed increase in the number tips and extension to the time period in which tipping can take place.

88. These responses and representations were made before the application was amended to remove the proposals to relocate the existing tipping operation, add an additional waste recycling skip, increase the number of tips of metallic waste and extend the time periods when tipping can take place. As a consequence, these concerns are no longer relevant as they relate to changes that are no longer proposed by this application. Following the amendments to the application, a representation has been received from a resident expressing their support for the amendments despite having previously objected to the application. Further, the local county councillor has expressed their satisfaction with the amendments to the application.

Conclusion

89. Having taken into consideration the findings of the submitted Noise Assessment, the amendments to the application, the advice received from the County Noise Consultant and the views expressed by consultees and local residents, Officers are satisfied that subject to the imposition of conditions, the proposal would not result in unacceptable levels of noise pollution or significant adverse impacts on the environment, health, quality of life or amenity of the local community. For these reasons, the proposals are considered to comply with national planning policy and local development plan policy requirements in respect of noise.

Water Environment

90. With regard to planning and flood risk, NPPF paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime. Paragraph 167 sets out that when determining planning applications, local planning authorities should ensure that flood-risk is not increased elsewhere.
91. SWLP Policy 13 requires all proposals for waste development to promote measures to ensure resilience and enable adaptation to a changing climate. SWLP Policy 14 requires that waste development does not result in unacceptable impacts on communities and the environment including in relation to the water environment with respect to: (a) flood risk (arising from all sources), including impacts on, and opportunities to provide and enhance, flood storage and surface water drainage capacity; and (b) water resources, including impacts on the quantity and quality of surface water and ground water resources, taking account of Source Protection Zones, the status of surface watercourses and waterbodies and groundwater bodies.
92. In relation to mitigating and adapting to the impacts of climate change, LPP1 Policy CC1 supports development that includes measures to provide appropriate flood storage capacity, address issues of flood risk and use sustainable drainage systems (SuDS) to help reduce surface water run-off. Policy CC4 of the LPP1 aims to reduce the overall and local risk of flooding by ensuring development is located, designed and laid out to ensure that it is safe, that the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere, and that residual risks are safely managed. The policy requires SuDS for major developments and encourages them for smaller schemes. It also requires no increase in the volume or rate of surface water run-off leaving the site and no property or highway flooding, off-site, for up to the 1 in 100 year storm return period, including an allowance for climate change.
93. 'Saved' WBLP Policy D1 states that development will not be permitted where it would result in material detriment to the environment by virtue of loss or damage to important environmental assets such as local watercourses and potential pollution of water. To

limit environmental impacts, the policy explains that the Council may include the submission of a flood-risk / run-off assessment to determine the potential flood risk to the development, the likely effects of the development on flood risk to others, whether mitigation is necessary, and if so, whether it is likely to be effective and acceptable.

Surface Water Flooding

94. The wider site has an existing approved and purpose-built drainage system already in place which collects surface water run-off and directs this into a piped network. The system discharges into a drainage basin located to the south of Building A. Aided by the installation of a flow restriction device, the water in the drainage basin out-falls at an attenuated rate into the adjacent water course. The dimensions of the drainage basin are approximately 10m by 20m, it has an average depth of approximately 1.3m and can hold 306.9 cubic metres of water.
95. The applicant has submitted a Flood Risk Assessment (FRA) and Surface Water Management Strategy (SWMS) in support of the application. This explains that the application site is wholly located in Flood Zone 1 where there is a low probability of flooding (i.e. a less than a 1 in 1000 annual probability of river or sea flooding in any one year). The FRA considers the risk of surface water flooding for a wide range of sources and identifies that the risk to the proposed development is low. The exception is the risk of flooding from surface water which could accumulate in the area of proposed new hardstanding if the surface water drainage system has insufficient capacity and becomes surcharged.
96. As this is a part retrospective application and part of the drainage system has already been installed (i.e. the piped network beneath the concrete hardstanding), it is not possible to change this part of the drainage system. The FRA / SWMS therefore proposes modifications to ensure that the risk of flooding remains low. These modifications comprise a system of swales, installed around the area of hardstanding, designed to channel any surface water into the existing drainage basin from where it will discharge at the restricted rate of 2 litres per second (2l/s) into a watercourse. The FRA / SWMS states that this rate of discharge has been agreed previously by the LPA as part of an approved planning application for the extension of the building.
97. The FRA / SWMS explains that both the existing and proposed drainage systems have been hydraulically modelled and the results of the analysis demonstrate that by enlarging the existing detention basin to provide a minimum of 66.25 cubic m of additional storage capacity, the risk of flooding off-site will not be increased.

Groundwater Flooding

98. In terms of groundwater, the FRA / SWMS identifies that the underlying geology in the area is Weald Clay Formation (mudstone) with no overlying superficial deposits. This bedrock is typically considered impermeable meaning that above ground flooding as a result of groundwater emergence is not expected in this location. This is supported by the detailed mapping on groundwater emergence provided as part of the Defra Groundwater Flood Scoping Study (May 2004) which shows that no groundwater flooding events were recorded during the very wet periods of 2000/01 or 2002/03, and that the site is not located within an area where groundwater emergence is predicted. Further, inspection of the Waverley Strategic Flood Risk Assessment (SFRA) identifies that there are no records of groundwater flooding having occurred at this location in the past. For these reasons, the FRA / SWMS finds that the risk of groundwater flooding is low.

Assessment

- 8
99. The Lead Local Flood Authority (LLFA) has reviewed the surface water drainage strategy for the proposed development and assessed it against the requirements of the NPPF, its accompanying nPPG and the Non-Statutory Technical Standards for Sustainable Drainage Systems. The LLFA has advised that they are satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to the imposition of two planning conditions. These are necessary to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development. The first condition requires details of the design of the surface water drainage scheme to be submitted to the CPA within 3 months for approval in writing. The second condition requires the submission of a verification report upon completion of the surface water swale and extension of the existing attenuation basin for written approval by the CPA.
 100. No views on the application have been received from Thames Water. Representations objecting to the application have been received due to concerns over the increased need for water use at the site and the need for the new drainage pipe placed on woodland adjoining Barn Cottage to be redirected as potentially toxic metals are being processed in the plant.
 101. The application does not set out any proposals for additional water use at the site. Due to the nature of operations taking place on the site, the main pollutants will be hydrocarbon based. The existing attenuation drainage basin inlet pipe contains a screen to capture any debris. Further, an oil / petrol inceptor estimated to be approximately 1.3m deep, 20m long and 10m wide has been installed beneath the area of hardstanding to reduce the risk of any pollutants reaching the detention basin and subsequently the watercourse. A second oil / petrol inceptor tank is proposed to be installed on the south-east boundary of the wider storage depot site beyond the application site boundary.
 102. The proposed measures are therefore considered to satisfactorily demonstrate that surface water will be contained within the site and will be discharged at a restricted rate preventing any increased risk of flooding to the surrounding land. The assessment is also considered to provide sufficient evidence to demonstrate that the risk of groundwater flooding is low.

Conclusion

103. Officers are satisfied that subject to the imposition of conditions requiring the provision of enhanced storage and surface water drainage capacity, and a subsequent verification report to demonstrate that the drainage scheme has been satisfactorily implemented and will be maintained throughout its lifetime, the application site has a low probability of flooding, would not have an unacceptable impact on water resources, including groundwater, or communities and the environment by increasing flood-risk elsewhere and would not result in damage to local water courses or the potential pollution of water. For these reasons, the application is therefore considered to be in accordance with national planning policy and the requirements of the development plan in respect of the impact on the water environment.

Landscape and Visual Impact

104. NPPF paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity or geological value and soils; recognising the intrinsic character

and beauty of the countryside including the benefits of trees and woodland; minimising impacts on and providing net gains for biodiversity; prevent development from contributing to, being put at unacceptable risk from, or being adversely affected by land instability; and remediating and mitigating unstable land, where appropriate.

105. SWLP Policy 13 requires all proposals for waste development to demonstrate that the development is of a scale, form and character appropriate to its location and maximise landscape enhancements and other measures that may contribute to green infrastructure provision. The policy also promotes measures to ensure resilience and enable adaptation to a changing climate. Policy 14 of the SWLP requires waste development to be consistent with national policy with respect to protected landscapes including the Surrey Hills AONB and not to result in unacceptable impacts on the landscape (including impacts on the appearance, quality and character of the landscape and any features that contribute to its distinctiveness, including character areas defined at the national and local levels) and land and soil resources including the need to address existing and potential land stability issues.
106. LPP1 Policy RE1 seeks to recognise and safeguard the intrinsic character and beauty of the countryside. Policy RE3 of the LPP1 requires new development to respect and where appropriate enhance the distinctive character of the landscape in which it is located. The policy states that the setting of the AONB will be protected where development outside its boundaries harm public views from or into the AONB. It also requires the same principles for protecting the AONB to be applied to the AGLV pending a review of the Surrey Hills AONB boundary.
107. 'Saved' WBLP Policy D1 states that development will not be permitted where it would result in material detriment to the environment by virtue of the loss or damage to important environmental assets including landscape and harm to the visual character and distinctiveness of a locality, particularly in respect of the design and scale of the development and its relationship to its surroundings.
108. SCC's Landscape Character Assessment (2015) identifies 21 generic landscape character types across the county. These are split into 140 locally related and named landscape character areas. The application site is located within generic landscape character area WW Wooded Low Weald. This comprises predominantly lowland, undulating between roughly 50m AOD and 100m AOD, and rising up to meet the greensand hills to the north. The area is scattered with woodland blocks and includes significant amounts of tree cover, including ancient woodland, tree belts, shaws, hangers and large mature hedgerow trees such as oaks.
109. The application site lies in local landscape character area WW3: Grafham to Dunsfold Wooded Low Weald. Key characteristics are: that it consists of relatively low lying, gently undulating landform; at least 50% of the character area is covered by ancient woodland; it contains extensive continuous tracts of woodland including semi-natural broadleaved woodland, as well as coniferous plantations with mixed and broadleaved stands; there are occasional wooded gills and hangers; between woodland blocks there are arable fields and smaller areas of pasture, often bounded by hedges and tree belts; and the enclosed nature of the character area limits long distance views.
110. The application site is located within an AGLV at around 55m above ordnance datum (AOD). The AGLV forms a buffer around the edge of the Surrey Hills AONB which is located around 560m to the west of the application site at 70m AOD. In view of the extent of the separation distance between the application site and the AONB, intervening topography, the limited scale of new development proposed and the amount of woodland screening around the north-west and south-west boundaries of

the site, the proposal would not have an adverse impact on the setting of the AONB and would not harm public views from or into the AONB.

111. The change of use of the north-western third of Building A will have no additional visual and landscape impact as the building is already there. The extended area of hardstanding has been laid on previously developed land and is well set back from the site entrance on Chiddingfold Road. The new area of hardstanding and retaining wall are almost entirely hidden from public view being situated towards the rear of the site between the back of Building A and adjoining woodland. In the context of the overall site, these new features are dwarfed by the size of the existing Building A. Further, the surrounding woodland effectively screens the wider site from views from the south, west, north-west and south-east. The trees protected by TPOs alongside the site boundary fronting Chiddingfold Road are not affected by the proposal.
112. The soil embankment along the south-west boundary of the application site slopes towards the storage depot posing a risk of land slippage. The retaining wall has been developed along this boundary to retain the soil levels within the adjoining woodland. This will help to increase the stability of the adjoining land, protect adjoining soils and prevent earth and soil from slipping onto the application site in accordance with national landscape policy and the requirements of SWLP Policy 14.
113. The applicant has submitted a Tree Constraints Plan, Tree Survey and Impact Assessment (TSIA), Arboricultural Method Statement (AMS), Tree Protection Plan and Preliminary Ecological Appraisal (PEA) in support of the application. The details contained in these submissions are considered in the section on Ecology and Biodiversity below.
114. The County Landscape Officer (CLO) has advised that the proposed internal change of use is not relevant to landscape considerations and has raised no concerns over the physical development itself as this is of limited scale and is sited in a discreet location at the rear of the site. The CLO believes that the main issue relevant to landscape is the relationship between the external development and the adjoining woodland as any damage would adversely affect landscape character.
115. As the proposal to construct the retaining wall is retrospective, the CLO points out that it is unclear whether there was any damage to trees during its construction. However, if deemed appropriate to achieve biodiversity net-gain (BNG), the CLO would support the imposition of a landscape condition to secure the management actions for the non-ancient woodland to the south-west of the site as set out in the submitted TSIA, the recommendation in respect of trees and SuDS contained in the submitted PEA, landscape enhancements through new planting around the site boundaries and enhanced management of the existing woodland.
116. Officers consider that it would be appropriate to impose a condition requiring the submission of a Landscape Management Plan incorporating the recommendations for the enhancement of existing woodland set out in the TSIA and new planting around the site boundary. This would help to secure the preservation and enhancement of the local landscape which forms part of the AGLV. The issue of BNG is considered in the section on Ecology and Biodiversity below.
117. A representation has been received stating that the recent felling of the copse on the site appeared to include a large number of trees. In response, the applicant has confirmed that this is as a result of normal woodland management and is not related to this current planning application.

Conclusion

118. Having assessed the landscape and visual impact of the proposal, Officers are satisfied that subject to the imposition of a landscape condition to protect and enhance the adjoining woodland and enhance planting around the periphery of the site, the application would not have an unacceptable impact on the AGLV or visual amenity and is in accordance with national and local development plan policies relating to landscape protection.

Ecology and Biodiversity

119. NPPF paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by: protecting and enhancing sites of biodiversity and soils; recognising the wider benefits from natural capital and ecosystems including trees and woodland; and minimising impacts on and providing net-gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 179 requires plans to promote the conservation, restoration and enhancement of priority habitats and the protection and recovery of priority species.
120. Paragraph 180 states that planning permission should: be refused if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or, as a last resort, compensated for; not normally be permitted for development located within or outside a SSSI which is likely to have an adverse impact on it unless the benefits of the development in this location clearly outweigh both its likely impact and any broader impacts on the national network of SSSIs; be refused for development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) unless there are wholly exceptional reasons² and a suitable compensation strategy exists; and, be supported for development whose primary objective is to conserve or enhance biodiversity and that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net-gains for biodiversity.
121. Policy 13 of the SWLP requires all proposals for waste development to demonstrate that measures are included to maximise biodiversity gains during its construction and operation. SWLP Policy 14 requires waste development to be consistent with national policy in respect of sites of national importance for biodiversity including SSSIs located within the county or where they could be affected by development located in the county. The policy also requires that waste development does not result in unacceptable impacts on communities and the environment including in relation to the natural environment including biodiversity, sites of local importance for biodiversity such as SNCIs, irreplaceable habitats such as ancient woodland and protected species.
122. LPP1 Policy NE1 seeks to conserve and enhance biodiversity by permitting development that retains, protects and enhances features of biodiversity interest and ensures appropriate management of those features and that adverse impacts are avoided, or if unavoidable, are appropriately mitigated. The policy pays particular regard to designated sites including SSSIs, SNCIs and ancient woodland and does not

² For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

allow development adjacent to these sites where it would have an adverse impact on the integrity of the nature conservation interest. It also requires new development within and adjacent to Biodiversity Opportunity Areas (BOAs) to, where appropriate, contribute to the protection, management and enhancement of biodiversity which may include the restoration and creation of priority habitats and the recovery of priority species populations.

123. Policy NE2 of the LPP1 states that new development should make a positive contribution to biodiversity by creating or reinforcing habitat linkages between designated sites in order to achieve a connected ecological network of wildlife corridors and green infrastructure. The policy also aims to maintain and enhance existing trees, woodland and hedgerows where appropriate. 'Saved' WBLP Policy D1 states that development will not be permitted where it would result in material detriment to the environment by virtue of loss or damage to important environmental assets, such as areas of ecological value.
124. 'Saved' Policy D7 of the WBLP aims to ensure that development proposals on sites which contain, or are close to, important trees, groups of trees or hedgerows provide for their long-term retention and does not permit proposals resulting in a loss of important trees or groups of hedgerows, requires the adequate protection during construction of trees and hedgerows that are to be retained to avoid damage including activities causing soil compaction or severance of roots, requires adequate separation between important trees or hedgerows and the proposed development, and requires the planting of new trees and other vegetation where appropriate.
125. WBLP 'saved' Policy C7 seeks to ensure that the extent of tree cover in the Borough is maintained and resists the loss or seeks the replacement of trees, woodlands and hedgerows in areas which contain features that are characteristic or make a significant contribution to the appearance of the landscape and are of wildlife interest. The policy seeks opportunities for improving hedgerows present on development sites through landscape management.
126. Chiddingfold Forest SSSI is located around 25m to the north-west of the application site which is located within a SSSI Impact Zone. The MAGIC website, which is managed by Natural England, describes the SSSI as being in a favourable condition and confirms that the type of waste use being proposed does not fall within the categories of waste development that Natural England are required to be consulted on. Reflecting on the limited nature of the proposed new development, with waste processing taking place within an enclosed space, the location of the development within an existing industrial site, and the small increase in the number of HGV movements, the proposal is not considered to have an adverse ecological impact on the SSSI.
127. Two SNCIs lie within 1km of the application site, the nearest of which is the Botany Bay to Durfold Wood SNCI being located around 505m to the south. In view of the limited nature of the operational development proposed, the extent of the separation distance between the application site and the nearest SNCIs and the intervening land uses situated in between, the application is considered unlikely to have an unacceptable ecological impact on SNCIs in the vicinity.
128. The application site is located within the Chiddingfold and West Weald Woodlands Biodiversity Opportunity Area (BOA) which has been identified as it contains lowland mixed deciduous woodland, wet woodland, lowland meadows and ancient woodland. It also abuts an area of woodland to the north-west and south-west and the Birchen

Copse Ancient Semi Natural Woodland is situated some 10m from the north-western boundary of the application site.

Trees and Woodland

129. The applicant has submitted a Tree Constraints Plan, Tree Survey and Impact Assessment (TSIA), Arboricultural Method Statement (AMS) and a Tree Protection Plan in support of the application. The Tree Constraints Plan shows the root protection areas (RPAs) of trees located on the woodland edge along the north-west and south-west boundaries of the site. The submitted TSIA explains that the proposed retaining wall has been carefully sited at the edge of the existing concrete and compound area and although the proposed excavation to form the wall is proximate to the trees on the woodland edge, the proposed development results in no direct tree loss, seeks to retain the tree cover and is located remote from RPAs. The AMS adds that no tree removal or pruning work is required to accommodate the retaining wall and that utility provision is not located in an area where it would harm trees.
130. The TSIA sets out mitigation measures necessary to protect trees when development work is taking place and where intrusion within the RPA is unavoidable. The Tree Protection Plan shows a 2m high protective steel mesh barrier located between the retaining wall and the adjoining woodland along the site's south-western boundary. This is used to protect trees and their root protection zones during development. The AMS sets out restrictions within the temporarily barriered areas which include prohibiting the storage of materials and equipment and the exclusion of heavy plant, machinery, cranes and delivery vehicles. The Tree Protection Plan illustrates that the placement of a protective barrier close to the north-west boundary of the site to protect adjoining trees during the construction of the retaining wall was not required due to the extent of the separation distance between the retaining wall and the RPAs of adjacent trees in this location.
131. The Tree Constraints Plan and Tree Protection Plan identify the different tree types located on the woodland edge. They show the results of tree survey work undertaken including the condition of the tree types listed and recommended tree works which form part of a woodland management strategy set out within the TSIA. This strategy involves the selective thinning of at least a 10 metre-wide band of mixed broadleaf woodland adjacent to the south-west boundary of the site. This is intended to remove the ash which are showing advanced signs of ash dieback, the weaker specimens of birch, and goat willow whilst retaining the oak and hawthorn. Specifically, the strategy identifies two goat willows and two aspen trees for coppicing to promote low level regeneration and / or allow adjoining hornbeam saplings to develop more fully. It also identifies the need for selective thinning around a single English oak tree to allow the tree to develop.
132. The strategy aims to leave behind the hawthorn understorey and specimens of English oak and hornbeam. This is intended to enhance the woodland edge, increase light levels, secure the natural regeneration of trees in order to overcome a propensity for edge trees to fail due to extreme weather events, enable a diverse array of species to grow and thrive, encourage the development of a robust woodland edge that will benefit biodiversity, and help the tree stock to be able to withstand climate change.
133. In view of the above, it is considered that the retaining wall will assist in protecting the adjacent woodland and preserve the ecological attributes of the BOA. It will help to retain operations within the application site, prevent soil movement and support the conservation of the adjoining woodland. Further, Officers accept that the woodland management strategy would contribute to the protection, management and

enhancement of biodiversity within the BOA and would not have an unacceptable ecological impact on irreplaceable habitats such as ancient woodland or result in their loss or deterioration.

Habitats and Species

- 8
134. The applicant has submitted a Preliminary Ecological Appraisal (PEA) and Preliminary Inspection for Bats (PIB) in support of the development. The PEA comprises an online data search and Phase 1 habitat survey to assess the baseline ecological conditions of the site and its potential to support protected species and species of conservation concern. The PIB comprises an external and internal inspection for bats of the buildings on site to inform an assessment of the potential for summer roosting and winter hibernating bats being present. It also assesses habitats for their potential to support foraging and commuting bats.
 135. Twenty-eight areas of ancient woodland and ten areas of ancient planted woodland were identified within 1 km of the site which is immediately adjacent to an area of deciduous woodland, which is a Priority Habitat. During the survey, the site was found to comprise scattered scrub, broad-leaved trees, tall ruderal, ephemeral/short perennial, fences, walls, buildings, bare ground, and hard standing. No invasive plant species or protected / notable rare plant species were noted and no priority habitats were found within the application site. In terms of protected species and priority species, the survey found that great crested newts and reptiles were very unlikely to be present on site, and the likelihood of birds and invertebrates of conservation concern, badger, hazel dormouse, brown hare, water vole, European otter and European hedgehog being present was found to be negligible.
 136. The site was found to have potential to support common toads, habitats with potential to support breeding birds and Building B was identified as having low potential to support roosting bats. The applicant's ecological surveys recommend a range of mitigation measures in respect of priority habitats, trees and protected species and species of conservation concern. Some of these measures relate to the construction of development that has already taken place and are therefore no longer considered relevant going forward. Those measures that are still deemed relevant to this proposal include:
 137. Priority habitats
 - There should be no direct access from the development into the adjacent woodland.
 - The removal of trees should be kept to a minimum.
 - Any planting of shrubs and trees should include native species of local provenance, such as guelder-rose (*Viburnum opulus*), field maple (*Acer campestre*), blackthorn (*Prunus spinosa*) and hornbeam (*Carpinus betulus*).
 - A sensitive lighting plan should be adopted, to ensure that outside lighting does not adversely affect adjacent habitats and wildlife, particularly bats when foraging and commuting.
 138. Trees
 - Trees on site should be retained, where possible. Any trees lost as a result of the proposed development, should be replaced with equivalent numbers of native species.
 139. Protected Species and Species of Conservation Concern

- Habitats within the site should be carefully cleared, to ensure that any common toads, if present, can be safely moved away into surrounding habitats of their own accord.
 - Any necessary clearance of trees and scrub should be undertaken outside of the breeding bird season (September to February inclusive). However, if works which are likely to damage bird nests need to be carried out during the nesting period, there is potential that nesting birds could be harmed and disturbed. To ensure legal compliance, a check should be undertaken by an ecologist within 48 hours of works commencing, to confirm the presence/absence of nest sites. If nests sites are identified, works to that feature should be delayed until the nest site becomes inactive (species specific, but approximately 4-6 weeks maximum).
140. In respect of ecological enhancements and the achievement of BNG, the applicant's PEA recommends the following 4 measures that should be included in a Biodiversity Management and Maintenance Scheme covering at least the first 10 years following completion of the development:
- Planting of trees or shrubs should comprise as many native species as possible and should include species known to thrive in the local area.
 - Use of appropriate SuDS.
 - The installation of Schwegler 2F Bat Boxes (or similar) on existing retained trees, would be beneficial to common and widespread bat species that are likely to be present on site.
 - The installation of RSPB Robin and Wren Diamond Nest boxes and Apex Open-Front Nest boxes on buildings/retained trees would be beneficial to garden bird species.
141. The County Ecologist has raised no objection to the application advising that a condition should be sufficient to provide some biodiversity net-gain. This would also reflect the advice provided by the CLO. No views have been received by the County Arboriculturalist and no representations have been received in relation to ecology and biodiversity. Officers consider that the above mitigation measures in respect of priority habitats, trees and protected species and species of conservation concern can be suitably addressed through the inclusion of a suitably worded informative and that the measures recommended to achieve BNG can be secured by condition.

Conclusion

142. Having assessed the implications of the proposed development on ecological and biodiversity interests, Officers consider that subject to the imposition of a planning condition to secure the BNG measures proposed by the applicant, the proposal would not result in the loss or deterioration of irreplaceable habitats, important trees or hedgerows, have an unacceptable ecological impact on the natural environment or sites of national or local importance for biodiversity and would support the conservation and enhancement of biodiversity, provide for the planting of appropriate new trees and vegetation and contribute to the protection, management and improvement of the Chiddingfold and West Weald Woodlands BOA in which the site is situated. For these reasons, Officers are satisfied that the application is in accordance with the requirements of national planning policy and the local development plan in this respect.

Public Amenity

143. Planning controls relating to the existing waste use taking place on the south-eastern two-thirds of the storage depot include a number of conditions intended to protect the amenity of residents. These relate to: controls over the hours of operation; the closure of doors at the rear of Building B when waste processing activities are being undertaken; preventing the sorting of waste materials in the open yard area; preventing the burning of waste or other materials; and ensuring the maintenance of all plant, machinery and vehicles.
144. Officers consider that these conditions are equally relevant to these proposals and should therefore be carried forward with suitable amendments where necessary to tailor them to the circumstances relating to this application. These controls are considered necessary by Officers in the interest of ensuring the continued protection of public amenity in the locality in accordance with SWLP Policy 14 and 'saved' WBLP Policy D1 and D2.

Community Engagement

145. SWLP Policy 16 states that applicants are encouraged to undertake suitable proportionate steps to engage with the local community before submitting their application and ensure that comments from the community have been taken into account. Officers understand that the applicant has a history of engaging with the local community although it is not clear whether engagement took place prior to the submission of the application.
146. In October 2021, the planning agent and site operator met with the local county councillor and local residents on site where four different methods for the tipping of metallic waste into the waste recycling skips were demonstrated in order to ascertain which method was deemed to be the quietest and least intrusive by local residents. This resulted in an amendment to the application to change to the quietest tipping method favoured by the local community.
147. This is considered to demonstrate positive local engagement with the local community in accordance with the spirit of this policy. Despite this engagement, the applicant subsequently amended the application in December 2021 to remove the proposal to relocate the tipping operation into the application site. The applicant explained that this was in order to simplify the planning considerations relating to the application. This amendment was received positively by one local resident and the local county councillor who subsequently wrote in to express their support for the changes proposed by the applicant.

Other Matters

Utility Infrastructure

148. In an automated response to an online query, the Health and Safety Executive (HSE) has advised that the proposed development does not intersect a pipeline or hazard zone and that HSE Planning Advice does not have an interest in the development. Similarly, in further automated responses to an online query, infrastructure plans shared by SGN and UK Power Networks do not identify any gas or electrical utility infrastructure within the application site.
149. However, UK Power Networks have identified the presence of an 11kV underground cable and a low voltage overhead line which terminate at a point a short distance to the north-east of Building B within the wider storage depot site as well as a low voltage overhead line which crosses over Chiddingfold Road at a point just to the south-east of

the main entrance before continuing in both a north-westerly and a south-easterly direction along the opposite site of Chiddingfold Road.

150. To err on the side of caution, the relevant plans, symbols booklet and safety information / guidance documents provided by UK Power Networks have been forwarded to the planning agent to pass on to the site operator so that these can be brought to the attention of contractors in the event that any works are proposed in this part of the wider site in future.

Human Rights Implications

151. 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.
152. Having considered the limited effects of the proposal on noise and public amenity, it is the Officers view that with the imposition of suitable planning conditions, any potential impacts are not considered sufficient to engage any of the articles of the Convention and that the proposal has no Human Rights Implications.

Conclusion

153. The proposal is seeking to extend the existing waste use, which currently occupies the south-eastern two-thirds of Chiddingfold Storage Depot, over the north-western third of the site to create a single planning unit for waste development. It also aims to regularise some operational development which was built without the benefit of planning permission. In order to achieve this objective, the application is seeking the change of use of the north-western end of Building A from document storage (Class B8) to the storage of automotive parts and processing of catalytic converters and clutches. Retrospective planning permission is also being sought for the creation of an extended area of hardstanding and the erection of a retaining wall.
154. The extension of the established waste management facility into the north-west of the site would make effective use of previously developed land and help an existing rural business to expand. The proposal would assist in the achievement of net self-sufficiency in the management of Surrey's waste by increasing waste management capacity within the county. It would also contribute to increased rates of re-use, recycling and recovery of automotive parts including catalytic convertors and clutches in accordance with objectives of the waste hierarchy.
155. Officers consider that the extended area of hardstanding would help to improve the operational efficiency of the site by providing a smoother surface that would be easier to clean, reducing any limited potential for dust during periods of warm dry weather and limiting noise from vehicles traversing over the surface. In respect of the retaining wall, Officers accept that this would provide an effective means of retaining soils within the existing woodland and consider that this will increase the stability of the adjoining land, protect adjoining soils and prevent earth and soil from slipping onto the application site.
156. No changes are proposed to the existing site access arrangements. The application would result in an additional 8 HGV movements per month. The CHA has assessed the application on highway safety, capacity and policy grounds and advised that the

proposal is unlikely to have a material impact on highway safety issues subject to a condition to ensure that maximum visibility splays are achieved at all times and any overgrown vegetation is maintained by the applicant.

157. Subject to the imposition of a condition requiring the high level windows in Building A to be secondary glazed or bricked up, the submitted Noise Assessment finds that any noise generated will be below background levels at the main sensitive receptor points and will have a low impact on residents. The County Noise Consultant has advised that the noise conditions imposed on the existing waste use should be carried forward so that the entire site operates under one set of noise conditions. Subject to the carrying forward of the existing noise conditions and the imposition of a condition in respect of the high-level windows in Building A, Officers are satisfied that the application will not result in unacceptable levels of noise disturbance.
158. The application site is located in Flood Zone 1 and has a low probability of flooding. The risk of groundwater flooding is low. To ensure the risk of surface water flooding remains low, a system of swales is proposed to channel any surface water into the existing drainage basin which is proposed to be enlarged. The LLFA has advised that they are satisfied with the surface water drainage strategy subject to conditions to ensure that the strategy is properly implemented and maintained throughout its lifetime.
159. The site is located within the AGLV and around 560m to the east of the AONB. The CLO has advised that the proposed change of use is not relevant to landscape considerations and has no landscape concerns over the hardstanding and retaining wall in view of their limited scale and discreet location. The CLO would support a landscape condition to secure the management of adjoining woodland and provide for enhanced planting around the periphery of the site. Subject to the imposition of a landscape condition, it is considered that the proposal would not have an unacceptable impact on the AGLV or visual amenity.
160. The assessment finds that the application would not result in an unacceptable ecological impact on either Chiddingfold Forest SSSI, the closest SNCIs or irreplaceable habitats such as ancient woodland or result in their loss or deterioration. The applicant's ecological surveys recommend a range of mitigation measures in respect of priority habitats, trees and protected species and species of conservation concern. The County Ecologist has advised that a condition should be sufficient to provide some BNG. Subject to a condition to secure the BNG measures proposed in the submitted PEA, it is considered that the proposal would contribute to the protection, management and enhancement of biodiversity within the Chiddingfold and West Weald Woodlands BOA where the application site is situated and not have an unacceptable impact on ecological or biodiversity interests.
161. Waverley Borough Council has raised no objection to the application and has drawn attention to the Parish Council's suggestion of a condition to restrict the permitted number of tips of metallic waste into the waste recycling skips. Six objections have been received from local residents with the impact of noise being the primary matter of concern. These concerns have been addressed by the applicant following amendments made to the application which remove the original proposals to make changes to the existing metallic waste tipping operation situated within the wider site including its relocation into the application site.
162. Taking the above findings into consideration, Officers are satisfied that the proposed development is acceptable and complies with national planning policy and local

development plan policy requirements subject to the imposition of conditions to control the impact of the development on local amenity and the environment.

Recommendation

163. The recommendation is to **PERMIT** planning application WA/2021/0286 subject to the following conditions:

Conditions

CONDITIONS 5, 6, 7, 11 and 12 MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF WASTE OPERATIONS.

Approved Plans and Drawings

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

Drawing Ref: 0801 – SK20-04 rev. B Location Plan dated February 2021

Drawing Ref: 0801 – SK20-03 rev. B Existing Site Plan dated February 2021

Drawing Ref: 0801 – SK-01 rev. J Existing and Proposed Floor Plans dated October 2020

Drawing Ref: 0801 – SK20-02 rev. 0 Retaining Wall Elevations Plan and Section dated May 2020

Drawing Ref: 0801 – SK20-01 rev. D Proposed Retaining Wall and Hard Standing dated December 2021

Commencement

2. The operator shall notify the County Planning Authority in writing within seven working days of the completion of the change of use of the north-west of Building A from document storage to waste use.

Hours of Operation

3. With the exception of the carrying out of emergency operations for safety and security purposes which must be notified to the County Planning Authority in writing within 5 working days of those emergency operations taking place, no operations or activities authorised or required by this permission shall take place other than during the hours of:

0800 to 1800 hours Monday to Friday

0800 to 1300 hours on Saturday

No operations or activities shall take place at any time on Sundays, Bank Holidays, Public or National Holidays.

Restriction of Permitted Development Rights

4. Notwithstanding any provision to the contrary under Part 7 (Class L) of the Town and Country Planning (General Permitted Development) (England) Order 2015 or any subsequent Order:

- i) no plant, buildings, structures or machinery whether fixed or moveable, other than those expressly authorised by this permission, shall be stationed, erected or constructed on the application site without the prior written approval of the County Planning Authority in respect of the location, design, measurements, specification and appearance of the installation.
- ii) no external lighting or fencing other than that already permitted shall be installed or erected at the site of the development hereby permitted.

Highways, Traffic and Access

- 5. Prior to commencement of waste operations, the vehicular access to Chiddingfold Road shall be provided with visibility zones in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.0 metre high.
- 6. Prior to commencement of waste operations, facilities for the secure, covered parking of bicycles shall be provided in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority and thereafter retained and maintained to the satisfaction of the County Planning Authority.
- 7. Prior to commencement of waste operations, at least 10% of the available parking spaces shall be provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) and a further 10% of the available spaces shall be provided with power supply for future additional fast charge sockets in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority.

Noise

- 8. The Rating Level, $L_{A,Tr}$, of the noise emitted from all plant, equipment and machinery (including on site vehicle movements) associated with the development shall not exceed 42 dB at any time at the nearest noise sensitive receptor. Any assessment carried out in pursuance of this condition shall be undertaken in accordance with British Standard (BS) 4142:2014 'Methods for rating and assessing industrial and commercial sound'.
- 9. Within 3 months of the date of this decision, a Noise Monitoring Scheme shall be submitted to the County Planning Authority for approval in writing. This scheme shall:
 - (a) take account of the noise limit set in Condition 8 above.
 - (b) be consistent with the Noise Monitoring Scheme approved under reference: WA/2019/0368 dated 31 July 2019.
 - (c) specify details of how noise monitoring shall be carried out within 3 months of completion of the development to demonstrate compliance with the noise limit set in Condition 8.
 - (d) specify details of how noise monitoring shall be carried out at the request of the County Planning Authority following receipt of a complaint to demonstrate compliance with the noise limit set in Condition 8.

The results of the noise monitoring (on each occasion) shall be reported in writing to the County Planning Authority within 14 days.

Should the development fail to comply with the noise limits set in Condition 8 the applicant shall:

- a) write to the County Planning Authority within 7 days specifying how working practices are to be amended to comply with the noise limit set in Condition 8 within a specified period, or
 - b) submit a scheme to the County Planning Authority for approval providing details of how the noise levels are to be attenuated to the required limit set in Condition 8 within a specified period.
10. No machinery shall be operated and no processing shall take place unless and until the high levels windows in Building A have been secondary glazed with 10mm laminated glass set back at least 100mm or permanently bricked up in accordance with the recommendation for mitigating the impact of noise outlined in section 6.4 of the submitted Industrial Noise Impact Assessment dated October 2020 (report reference: SA - 6377/3).

Water Environment

11. Within 3 months of the date of this permission, details of the design of a surface water drainage scheme shall be submitted to the County Planning Authority for approval in writing. The design must satisfy the Sustainable Drainage System (SuDS) Hierarchy and be compliant with the national Non-Statutory Technical Standards for Sustainable Drainage Systems, NPPF and Ministerial Statement on Sustainable Drainage Systems. The required drainage details shall include:
- i. Evidence that the proposed solution will effectively manage the 1 in 30 and 1 in 100 (+40% allowance for climate change) storm events during all stages of the development following the principles set out in the approved Flood Risk Assessment and Surface Water Management Strategy dated October 2020.
 - ii. Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of the proposed swale and surface water detention basin extension.
 - iii. A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
 - iv. Details of drainage management responsibilities and maintenance regimes for the drainage system.
12. Following the completion of the surface water swale and extension of the existing attenuation basin and prior to the commencement of waste operations, a verification report carried out by a qualified drainage engineer shall be submitted to the County Planning Authority and approved in writing. The report shall demonstrate that:
- i. the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations).
 - ii. provide the details of any management company.
 - iii. state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).
 - iv. confirm that any defects have been rectified.

Landscape and Visual Impact

13. Within 3 months of the date of this permission, a Landscape Management Plan shall be submitted to the County Planning Authority for approval in writing. The Landscape Management Plan shall include details of:
- i. provision for the enhancement of the existing woodland environment utilising native species based on the recommendations for woodland management contained in paragraphs 4.9, 4.10 and Appendix 3 of the submitted Tree Survey and Impact Assessment dated June 2020;
 - ii. provision for landscape enhancements through new native planting around the site boundary;
 - iii. planting specification including details of species, planting sizes and proposed numbers/quantities/seed mix and application;
 - iv. an aftercare regime including a requirement that all planting implemented pursuant to this permission shall be maintained in good, healthy condition and be protected from damage for a period of five years following the implementation of the new planting scheme and that any trees or shrubs which die, or are severely damaged or diseased during this five year period, shall be replaced in the next available planting season with others of a similar size and species.

The Landscape Management Plan shall be implemented in accordance with the approved details.

14. The areas of concrete hardstanding within the application site and the retaining wall shall be suitably maintained and kept in a good state of repair at all times.

Ecology and Biodiversity

15. Within 3 months of the date of this permission, a Biodiversity Management and Maintenance Scheme based on the recommendations contained in Section 7 of the submitted Preliminary Ecological Appraisal and Preliminary Inspection for Bats dated 19 November 2020 in respect of priority habitats, trees, protected species and species of conservation concern, and biodiversity net-gain covering a period of 10 years from the completion of the change of use of the north-west of Building A from document storage to waste use shall be submitted to the County Planning Authority for approval in writing.

Public Amenity

16. The doors situated on the north-west façade of Building A shall be kept closed at all times when processing activities are undertaken within this building.
17. All sorting of waste materials or any other materials shall take place within Building A. No sorting of waste materials or any other materials shall take place in the open yard area of the application site.
18. All plant, machinery and vehicles associated with the development hereby permitted shall be suitably maintained to the manufacturers' specifications for the duration of the development hereby permitted.
19. No burning of waste materials or any other materials shall take place on the application site.

Reasons

1. For the avoidance of doubt and in the interests of proper planning and to ensure the permission is implemented in accordance with the terms of the application and to enable the County Planning Authority to exercise planning control over the development so as to minimise its impact on the local community, public amenity and the local environment in accordance with the terms of Policy 14 of the Surrey Waste Local Plan 2020, Policies RE1, RE3 and NE1 of the Waverley Borough Local Plan Part 1 2018 and 'saved' Policies D1 and D4 of the Waverley Borough Local Plan 2002.
2. To enable the County Planning Authority to exercise planning control over the development so as to minimise the impact on local amenity to comply with Surrey Waste Local Plan 2020 Policy 14.
3. To enable the County Planning Authority to exercise planning control over the development so as to minimise the impact on local amenity to comply with Surrey Waste Local Plan 2020 Policy 14.
4. To enable the County Planning Authority to exercise control over the development in the interests of the landscape character of the area, the local community and to protect public amenity in accordance with Policy 14 of the Surrey Waste Local Plan 2020, Policy RE1 and RE3 of the Waverley Borough Local Plan Part 1 2018 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.
5. In the interests of ensuring safe and suitable means of access to the highway network and improving highway safety in accordance with paragraph 110 of the National Planning Policy Framework 2021 and Policy 15 of the Surrey Waste Local Plan 2020.
6. To minimise the number of vehicle movements, encourage non-car use, promote sustainable transport modes and improve conditions for cyclists in accordance with paragraphs 110 and 112 of the National Planning Policy Framework 2021, Policy 15 of the Surrey Waste Local Plan 2020, Policy ST1 of the Waverley Borough Local Plan Part 1 2018 and 'saved' Policy M5 of the Waverley Borough Local Plan 2002.
7. To promote sustainable transport modes and the use of low or zero emission vehicles in accordance with paragraphs 110 and 112 of the National Planning Policy Framework 2021, Policy 15 of the Surrey Waste Local Plan 2020 and Policy ST1 of the Waverley Borough Local Plan Part 1 2018.
8. To mitigate noise emissions in the interests of the local community and public amenity in accordance with Policy 14 of the Surrey Waste Local Plan 2020 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.
9. To mitigate noise emissions in the interests of the local community and public amenity in accordance with Policy 14 of the Surrey Waste Local Plan 2020 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.
10. To comply with the terms of the application and to mitigate noise emissions in the interests of the local community and public amenity in accordance with Policy D14 of the Surrey Waste Local Plan 2020 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.
11. To ensure the detailed design of the surface water drainage scheme is consistent with the national Non-Statutory Technical Standards for Sustainable Drainage System and that the final drainage design does not increase flood risk on or off site in accordance with paragraph 167 of the National Planning Policy Framework 2021, Policy 14 of the

Surrey Waste Local Plan 2020, Policy CC1 and CC4 of the Waverley Borough Local Plan Part 1 2018 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.

12. To enable the County Planning Authority to exercise planning control over the development and to minimise the impact of the development on the local community and the local environment in terms of preventing the risk of flooding in accordance with Policy 14 of the Surrey Waste Local Plan 2020 and Policy CC4 of the Waverley Borough Local Plan Part 1 2018.
13. To contribute to the natural and local environment, maximise landscape enhancements and safeguard the intrinsic character and beauty of the countryside in accordance with paragraph 174 of the National Planning Policy Framework 2021, Policy 13 of the Surrey Waste Local Plan 2020 and Policy RE1 of the Waverley Borough Local Plan Part 1 2018.
14. In the interests of the local community, public amenity and the local landscape in accordance with Policy 14 of the Surrey Waste Local Plan 2020 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.
15. To minimise the impact on and protect, enhance, and improve the resilience of sites of biodiversity value, maximise net-gains for biodiversity and safeguard the natural environment in accordance with paragraph 174 of the National Planning Policy Framework 2021, Policy 13 and 14 of the Surrey Waste Local Plan 2020, Policy NE1 and NE2 of the Waverley Borough Local Plan Part 1 2018 and 'saved' Policy D7 of the Waverley Borough Local Plan 2002.
16. To mitigate noise emissions in the interests of the local community and public amenity in accordance with Policy 14 of the Surrey Waste Local Plan 2020 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.
17. In the interests of public amenity and to protect the amenities of the local community in accordance with Policy 14 of the Surrey Waste Local Plan 2020.
18. In the interests of the local community and public amenity in accordance with Policy 14 of the Surrey Waste Local Plan 2020 and 'saved' Policy D1 of the Waverley Borough Local Plan 2002.
19. In the interests of the local community and public amenity in accordance with Policy 14 of the Surrey Waste Local Plan 2020 and 'saved' Policy D2 of the Waverley Borough Local Plan 2002.

Informatives

1. The applicant is advised to contact the Lead Local Flood Authority via SUDS@surreycc.gov.uk and obtain prior written consent if proposed works affect an Ordinary Watercourse.
2. If the proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.
(www.gov.uk/government/organisations/environmentagency)
3. The applicant's attention is drawn to paragraph 5.1 of the submitted Flood Risk Assessment and Surface Water Management Strategy which advises the

owners/manager of the site to regularly check local weather forecasts and the Met Office weather warnings (<https://www.metoffice.gov.uk/weather/warnings-and-advice>) during times of heightened flood risk to ensure they are aware of the potential for an extreme rainfall event which could result in the shallow accumulation of floodwater across the areas of hardstanding.

4. The applicant's attention is drawn to the recommendations contained in Chapter 7 of the submitted Preliminary Ecological Appraisal and Preliminary Inspection for Bats dated 19 November 2020 including the mitigation and avoidance measures necessary to ensure Priority Habitats should not be negatively impacted upon, the advice in relation to trees and the recommendations made in respect of protected species and species of conservation concern including common toads and breeding birds.
5. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (Section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or is being built. Planning consent for a development does not provide a defence against prosecution under this Act. Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site, and on land adjacent to the site where woodland management is proposed and are assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity during this period, and shown it is absolutely certain that nesting birds are not present.
6. The operator is requested to provide the County Planning Authority with prior notification before any maintenance or repair work to the concrete surface takes place. This would allow the County Planning Authority to notify the occupiers of nearby properties before any repair works commence.
7. Attention is drawn to the requirements of Sections 7 and 8A of the Chronically Sick and Disabled Persons Act 1970 and to the Code of Practice for Access of the Disabled to Buildings (British Standards Institution Code of Practice BS 8300:2009) or any prescribed document replacing that code.
8. The applicant's attention is drawn to the advice, guidance and safety information provided by UK Power Networks in relation to electricity infrastructure, copies of which have been provided to the applicant or can be obtained from the County Planning Authority on request.
9. In determining this application, the County Planning Authority has worked positively and proactively with the applicant by: assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its associated planning practice guidance and European Regulations and 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 have been raised with the applicant including impacts of traffic, noise, surface water management, landscape and visual impact and ecology and biodiversity and addressed through negotiation and acceptable amendments to the proposals. The applicant has also been given advance sight of the draft planning conditions. This approach has been in accordance with the requirements of paragraph 38 of the National Planning Policy Framework 2021.

Contact David Maxwell

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Background papers

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

For this application, the deposited application documents and plans, and responses to consultations, are available to view on our [online register](#). The representations received are publicly available to view on the district/borough planning register. The Waverley Borough Council planning register entry for this application can be found under [2021/0286](#).

Other documents

The following documents were also referred to in the preparation of this report:

Government Guidance

[National Planning Policy Framework](#)
[National Planning Policy for Waste](#)
[Planning Practice Guidance](#)

The Development Plan

[Surrey Waste Local Plan 2020](#)
[Waverley Borough Local Plan Part 1: Strategic Policies and Sites 2018](#)
[Waverley Borough Local Plan Part 2: Site Allocations and Development Management](#)
[Policies - Pre-Submission Document 2020](#)
[Waverley Borough Local Plan 2002 \(Saved Policies\)](#)

Other Documents

Surrey County Council: Environmental Impact Assessment (EIA) Screening Opinion Report, SCC EIA Case 021-0109, February 2021
Officer Report on Planning Application WA/2013/1223, Chiddingfold Storage Depot, dated October 2013
Officer Report on Planning Application WA/2014/0056, Chiddingfold Storage Depot, dated April 2014
Officer Report on Planning Application WA/2014/0863, Chiddingfold Storage Depot, dated March 2015
Officer Report on Planning Application WA/2017/2144, Chiddingfold Storage Depot, dated April 2018
Officer Report on Planning Application WA/2018/1613, Land adjacent to Wetwood Cottage, dated 20 March 2019
Surrey Landscape Character Assessment: Waverley Borough, Hankinson Duckett Associates, April 2015
