

**To:** Planning & Regulatory Committee

**Date:** 26 October 2022

**By:** Planning Development Manager

**District(s)** Guildford Borough Council

**Electoral Division(s):**

Worplesdon  
Mr Witham  
Guildford North  
Ms McShane

**Case Officer:**

Janine Wright

**Purpose:** For Decision

**Grid Ref:** 500372 152170

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**Title:** *Minerals/Waste GU22/CON/00006*

### **Summary Report**

**Land to the north east of Slyfield Industrial Estate, Moorfield Road, Guildford GU1 1RR**

**Construction and operation of a new sewage treatment works and associated above and below ground infrastructure, including new final effluent and storm water outfall, and new transfer tunnel.**

#### **Background information**

The application site is approximately 15.51ha and is located on the northern edge of Guildford, west of the A3 carriageway. The land was previously used in connection with the extracting of gravel and thereafter landfilling.

The proposal is seeking planning permission for the construction and operation of a new sewage treatment works (STW) and associated above and below ground infrastructure, including new final effluent and storm water outfall, and new transfer tunnel.

The development forms a critical part of the Slyfield Area Regeneration Project (SARP) which comprises of a mixed-use development for housing, employment uses and traveller and gypsy pitches. The SARP is an allocated site within the Guildford Borough Council Local Plan (2019), and the regeneration project is expected to be brought forward through three separate planning applications including the Weyside Urban Village development, Guildford Community Recycling Centre and Waste Transfer Station as well as the relocation of the STW. A plan shows the proposed development within the SARP is attached for information purposes only.

As mentioned above, the application site is an allocated site for redevelopment within the adopted Guildford Borough Council Local Plan (2019) and the Surrey Waste Local Plan (2020) Strategic Waste Site Allocation, under Policy A24 (Slyfield Area Regeneration Project) and Policy 11a: land to the north-east of Slyfield Industrial Estate, respectively.

The existing Guildford Sewage Treatment Works (STW) is located on a significant part of the SARP site and therefore needs to be relocated to facilitate the delivery of the project. The new STW must be fully operational before the existing STW can be decommissioned and the land developed as part of the Weyside Urban Village proposal. The WUV development is expected to deliver 1000 homes (including affordable) within the current plan period.

The application was publicised by the posting of site notices and an advert was placed in the Surrey Advertiser newspaper. A total of 1118 owner/occupier and businesses within the surrounding area were directly notified by letter. The development is considered to be an Environmental Impact Assessment (EIA) development, within the terms of paragraph 11(c) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. All necessary consultations have been carried out in accordance with the regulations.

A total of 13 letters of representations have been received with 7 objections raised and 1 comment. A number of consultations were undertaken most of these requesting additional information or the attachment of conditions/informatives. The Borough Council has raised no objections to the proposal.

The report summarises the assessment which has been made of the issues put forward by the applicant and identifies the relevant areas of potential harm which might arise as a result of the proposal. These includes the impact on the highway network, ecology, landscape character and heritage assets. It is concluded that subject to appropriate planning conditions the proposal would not cause significant harm.

The application site falls largely outside of the Metropolitan Green Belt designation, although the land where the outfall pipelines are located is designated as Green Belt. The outfall elements of the development are considered to be an engineering operation necessary to construct the STW infrastructure. Therefore, it is not considered to be inappropriate development as defined in paragraph 150 of the NPPF, provided that the openness of the Green Belt is preserved and there is no conflict with its purposes of including land within it.

Having regard to the environmental information contained within the Environment Statement, national and development plan policy, consultee views and concerns raised by local residents, officers consider subject to planning conditions, a Section 106 Agreement and other regulatory regimes, the development is consistent with the NPPF and the development plan policies.

**The recommendation is subject to the prior completion of a Section 106 Legal Agreement to PERMIT subject to conditions and informatives.**

## ***Application details***

### ***Applicant***

Thames Water

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

21 January 2022

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

13 May 2022 (extension of time agreed 1 November 2022)

### ***Amending Documents***

Memo dated 8 March 2022 from the applicant on air quality

Letter dated 7 April 2022 from the applicant

Letter dated 19 May 2022 from the applicant and accompanying documents responding to landscaping, historic buildings, geological and geotechnical comments, Environment Agency comments, and revised planning application drawing number: J009-AJ-GUILS1ZZ-PLN-DR-E-10390 P04 and revised Environmental Statement Appendix 9.4 – Type 3 Visualisations and Technical Methodology dated May 2022; and revised Schedule of Buildings and Structures dated 19 May 2022.

Email dated 24 May 2022 from the applicant regarding peak hour flow and attached traffic survey data.

Letter dated 1 June responding to air quality consultation comments

Email dated 14 June 2022 from the applicant and attached revised Appendix E Outline Borehole Management Plan and Borehole Logs from the Outline Remediation Strategy received 14 June 2022

Email dated 27 June 2022 from the applicant responding to County Geological Consultant comments.

Letter dated 19 July 2022 from the applicant regarding North Moors Pedestrian Crossing

Letter dated 19 July 2022 from the applicant regarding submission of Regulation 25 information and accompanying new Envirocheck Report, information for potable water supplies, Land Stability Addendum ; and Environmental Statement Addendum

Email from applicant dated 28 July 22 regarding an addendum to the Environmental Statement ref: J009-ENV-REP-10311.

## Summary of Planning Issues

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

	<b>Is this aspect of the proposal in accordance with the development plan?</b>	<b>Paragraphs in the report where this has been discussed</b>
Waste Management	Yes	78-98
Heritage	Yes	101-141
Archaeology	Yes	142-152
Landscape and Visual Impact	Yes	153-207
Ecology, Trees and biodiversity	Yes	219-278
Stability	Yes	279-290
Contamination	Yes	291-307
Noise and Vibration	Yes	308-335
Air Quality	Yes	336-378
Surface Water Drainage	Yes	379-393
Climate Change	Yes	394-408
Highways	Yes	409-461
Green Belt	Yes	462-478

## ***Illustrative material***

### **Site Plan**

Plan 1 – Site Location Plan and Application Site Area

Plan 2 – Elevation Plans

Plan 3 – indicative Plan showing the Slyfield Area Regeneration Project

## Aerial Photographs

Aerial 1 – Surrounding Area

## Site Photograph

Photographs (7) showing views of the proposed sewage treatment works (STW) site and view from the site to Burpham Court Farm.

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## Background

1. This proposal forms part of the Slyfield Area Regeneration Project (SARP). The SARP is a mixed-use regeneration project and is being brought forward in three phases:
  - This development proposal which is the relocation and replacement of the sewage treatment works (STW)
  - The Weyside Urban Village (WUV) which was a planning application submitted to Guildford Borough Council (ref: 20/P/02155) which was granted planning permission on 30 March 2022; and
  - The construction of a new community recycling centre (CRC) and waste transfer station (WTS) to replace the existing Guildford CRC and WTS.
2. The existing STW is located in the southern half of the SARP on a significant portion of land. To facilitate the delivery of homes in the WUV, the existing STW needs to be relocated. To mitigate the impacts of the WUV, a planning application was also submitted to Guildford Borough Council (20/P/02173) for a change of use to 45.9 hectares (ha) of publicly accessible open space and Nature Reserve to facilitate a Suitable Alternative Natural Greenspace (SANG). This planning application area overlaps part of the SANG planning application.
3. Policy A24 of the GBLP: Strategy and Sites provides for relocation of existing uses within the Slyfield Area Regeneration Programme. The STW forms part of this programme.

## Site Description

4. The application site is located on the northern edge of Guildford adjacent to the residential area of Bellfields and Slyfield Industrial Estate and is approximately 15.51 hectares (h). The northern part of the application site (where the proposed relocated STW and outfall pipe would be located) sits to the north west of Slyfield Industrial Estate and is an area of land which has previously been used for landfilling and is historically known as Slyfield Landfill. The STW would sit upon the northern half of Slyfield Landfill which is a historic landfill which operated in the 1970s and 1980s. Slyfield Landfill was used for inert, industrial/ commercial and household/ domestic waste with the depth of the waste varying from 3 metres (m) to 7.5m. Slyfield Landfill extends southwards with the north eastern part of Slyfield Industrial estate sitting upon it. Slyfield Landfill is a dilute and disperse landfill as it does not have any engineered containment or engineered impermeable cap with only a thin capping layer across the site. There are gas ventilation systems and a gas curtain on the Slyfield Industrial Estate for this reason. In 1996 a vertical gas barrier was installed along the southern and western edges of the landfill site in order to protect the surrounding industrial units.
5. Land beyond the northern extent of the application site is low lying pasture with interspersed tree belts with the River Wey and River Wey Navigation beyond wrapping around the north and west of the application site. Burpham Court Farm lies to the north beyond the River Wey, approximately 356m from the proposed STW location. Burpham Court Cottages, Grade II listed, form part of the suite of buildings in that location.
6. Access into this northern part of the application site is from both one at North Moors and the other at Westfield Road. Footpath 438 runs in a northern manner from the end of North

Moors towards Jacobs Well Road where it joins with footpath 439. The southern boundary of the proposed relocated STW abuts industrial units positioned on Westfield Road.

7. The application site extends southwards underneath the industrial estate and follows the western extent of the existing STW for the transfer tunnel. This tunnel would be underneath the ground. The River Wey lies adjacent at this point with the A3 beyond.
8. The southern extent of the application site is located within the existing Guildford highway depot. This is where a shaft would be dug for the transfer tunnel. The southern tip of the application site joins with the A320 Woking Road where there is an existing access for the highway depot. Residential properties of Stoke Mill Close, Swan Court, Mangles Road and Bellfields Road lie within 45m, 70m, 95m and 148m respectively of the southern most part of the application site. Burpham, Abbotswood and Bushy Hill residential areas are located approximately 300 metres (m) to the north-east of the application site. Weyfield primary School is within 200m of the application site. Footpath 66 meets the application site at Slyfield Green where it then runs southwards towards the River Wey where it splits and footpath 66 continues southwards and footpath 49 branches off in a south western manner.
9. The land to the south of the application site is to be developed as part of the Weyside Urban Village (WUV) development and encompasses the existing Guildford Community Recycling Centre and Waste Transfer Station; the former sludge lagoons and the existing sewage treatment works.
10. The majority of the application site is situated adjacent to the designated Metropolitan Green Belt boundary. However, the part of the application site which is intended for the outfall pipe from the STW to the River Wey, lies within the Green Belt. The Riverside Park Local Nature Reserves (LNR) is situated on the southern side of the River Wey and extends from the A320 in the south to Bowers Lane in the north. The LNR consists of meadow, wetland, open water and woodland. Part of the LNR is located between the northern part of the application site and the River Wey. The Slyfield meadows Site of Nature Conservation Importance (SNCI) abuts the application site's eastern boundary. The Thames Basin Heaths Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI) lay approximately 1.23km north west of the application site at Whitmoor Common including Britten's Pond. The Surrey Hills Area of Outstanding Natural Beauty (AONB) lies approximately 2.1 kilometres (km) to the south of the application site and is outside the development boundary.
11. The Wey and Godalming Navigations is designated as a Conservation Area and this follows the route of the Wey Navigation east of the northern part of the application site and immediately adjacent to the southern part of the application site.
12. Flood Zone 2 follows the route of the River Wey and River Wey Navigation with the outfall pipe, northern extent of the application site and parts of the transfer tunnel lying within Flood Zone 2. Flood Zone 3 follows the same route however only the outfall pipe lies within Flood Zone 3.

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## ***Planning History***

13. The relevant planning history is set out below:

### **A – Slyfield Landfill Site**

14. Sand and gravel extraction occurred during the 1960s following which landfilling operations commenced in the 1970s firstly with industrial/ commercial and then with household or domestic waste in the 1980s. The historic landfill has no impermeable cap or soil cover.
15. 2020/0010 Non-material amendment to planning permission (2017/0140) to allow for revised water storage Granted  
07/05/2020

infrastructure to improve circulation and storage space in the yard associated with the material recovery facility.

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|-----|--------|---|------------------------|
| 16. | PL8741 | 1 North Moors – Waste Transfer Station including storage of skips and erection of a building of about 164m <sup>2</sup> on a site of 0.8ha. | Granted<br>07/02/2021. |
|-----|--------|---|------------------------|

### **B- Sewage Treatment Site**

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|-----|----------------|---|-----------------------|
| 17. | GUI/1743       | Extension to sewage disposal works.   | Granted<br>16/07/1953 |
| 18. | GUI/4443/17157 | The layout of a site for a new works depot with workshop, stores and garages, new roads and parking area. | Granted<br>24/08/1959 |

## ***The proposal***

19. The application is seeking planning permission for the construction and operation of a new sewage treatment works (STW) and comprises three main elements:

- A new STW located to the north east of Slyfield Industrial Estate
- A new final effluent and storm water outfall pipelines from the new STW to the River Wey to the north east of the new STW placed underground. The outfall pipes would be 400m in length
- A new transfer tunnel, 1.4km in length, to transfer incoming waste water flows from existing sewers to the new STW. This would be located from the existing Guildford highway depot adjacent to Stoke Mill Close and would then run underground northwards adjacent to the existing STW site, underneath an area of scrub land and the existing community recycling centre (CRC) before continuing northwards to the proposed STW location.

20. The proposal would replace the existing Guildford STW and enable the redevelopment of the site to provide 1500 residential properties. These properties would form part of the Weyside Urban Village development (ref: GU. 20/P/02155) which has been granted planning permission.

### *New STW*

21. The main above ground element would be the new STW which would occupy an area of 6.1ha. the STW would have two vehicular access points: one from North Moors for staff accessing the office area, and one from Westfield Road. The STW would utilise conventional wastewater treatment processes details of which can be seen in the attached Planning Statement Figure 3.3: The Sewage Treatment Process (applicant figure). This drawing describes the primary treatment, secondary treatment, tertiary treatment, sludge treatment and storm storage. The following structures are proposed:

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| <ul style="list-style-type: none"><li>• Inlet pumping station</li><li>• Primary settlement tanks</li><li>• Final settlement tanks</li><li>• Storm water storage tanks</li><li>• Sludge import facilities</li><li>• Odour control units</li><br/><li>• Electrical intake substation</li><li>• Fuel storage tanks</li><li>• Various pipes and chambers</li></ul> | <ul style="list-style-type: none"><li>• Inlet works, screens and garages</li><li>• Activated sludge plant</li><li>• Tertiary treatment plant</li><li>• Sludge belt thickeners</li><li>• Sludge cake storage silos</li><li>• Various pumping stations and motor control centre (MCC) kiosks</li><li>• Standby generators</li><li>• Welfare building</li></ul> |
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- 22. The STW would be located on part of the historic Slyfield landfill site with most structures and plant to be constructed above ground, supported on piled foundations to avoid excavating the landfill. The piled foundations would go into the existing historic landfill. The inlet works, primary settlement tanks, activated sludge plant, final settlement tanks and tertiary treatment plant would be built from reinforced concrete. The aboveground stairs, walkways and handrails associated with the treatment process structures would be fabricated from steel.
- 23. The various tanks, required as part of the treatment process, will be constructed from polypropylene and/or glass lined steel with glass reinforced polyester (GRP) roofing.
- 24. The tallest structures within the application site would be:

Structure	Height above ground level
Inlet works	14.7m
Sludge cake storage silos	17.7m
Two odour control unit stacks	18.0m

- 25. The welfare building will provide an office, laboratory and welfare facilities for the whole STW site. The building will be constructed as a steel portal frame with profile steel and insulated cladding. The two-storey building would be approximately 10.49m in height.
- 26. A new electricity intake substation will be provided to supply power to the site. This will be housed within a segregated compound and brick-built building with a separate gated access from Moorfield Road and will provide 24-hour access for the electricity provider.

*Outfall*

- 27. A new final effluent and storm water outfall will be provided as part of the development. This will enable discharge into the *River Wey* to the north east of the new STW. The outfall will comprise of a new reinforced concrete structure on the southern bank of the *River Wey* and two below ground pipelines, to carry final effluent and storm water. The pipelines are anticipated to be made from coated steel pipes or a similar material. The outfall structure will be constructed to agreed design principles set out by the Environment Agency. The outfall structure will be largely below the water level of the river and therefore only the top part will be visible at the bankside point of discharge. Fencing will be provided for safety.

*Transfer Tunnel*

- 28. A new transfer tunnel would be provided to transfer the wastewater flows by gravity from the existing sewers to the new STW. The tunnel would be approximately 1.4km in length and on average 12m below the ground, sloping south to north. The tunnel will be constructed from pre-cast concrete segments. The tunnel would include seven permanent shafts (referred to hereon as E2, E3, E4, E4a, E5, E6 and E8) located along the tunnel shaft to enable the tunnel construction and to facilitate the interception of existing sewers that presently flow towards the existing STW. Downstream of the interception points, the exiting sewers would be blocked and abandoned where there is no flow. The tunnel would run from E8 at the southern point from the existing Guildford depot south of the existing STW, parallel with the *River Wey* until E4 when it would travel due north underneath the industrial estate until reaching its northern most shaft E2, which would form the new STW inlet pumping station and would be constructed through the landfill. At each of the tunnel shafts, apart from E2, above ground development would consist of a vent pipe 6m in height and a small kiosk to house odour control equipment.

29. To construct the transfer tunnel at shaft E8, a single storey portacabin and three small single storey red brick buildings would need to be demolished. Construction of the tunnel would be undertaken once construction of the relevant shaft is completed. The tunnel would be constructed in London Clay and would use a Tunnel Boring Machine. This process will generate 19,000m<sup>3</sup> of material including approximately 1,200m<sup>3</sup> of contaminated landfill material from shaft E2. The contaminated excavated material would be exported from site. The non contaminated material would be reused in the construction process.

### *Operational Phase*

30. Two permanent vehicular access points into the site are proposed from Westfield Road (east of the junction with Moorfield Road) and North Moors Road (south of Dennis Way). For safety and security both vehicle entrances will have automated security gates and two way intercom systems linked to the administration building. The gates are to be set back into the site to prevent vehicles queuing on the highway.
31. Security fencing measuring 2.4m in height would be erected around the perimeter of the new sewage treatment site. Landscape planting will be provided as part of the development proposal and all planting will be maintained in accordance with a landscape management plan. Infill planting will be provided to enhance visual screening and biodiversity within the woodland gaps and plant species would comprise of a mixture of native trees and shrubs to reflect the existing vegetation.
32. Operational lighting would be required on site and details of the lighting scheme are to be finalised, in agreement with the County Planning Authority. The agreed scheme will feature energy efficient systems, remote controlled lighting with LED units and local isolator switches to ensure minimal light pollution. During the construction works, it may be necessary to provide on-site lighting. The lighting would be designed to minimise spill, outside of the construction site, and will include LED lighting units, remote powered control lighting and luminaire ratio of 0% except where upward task lighting is required. Where fixed lighting and mobile task-specific lighting is necessary, the lighting will be used and moved as required depending upon the specific construction task being undertaken.
33. The applicant proposes to use bespoke odour control covers on various parts of the treatment process and two odour control units would be located on site. The air would be extracted from the most odorous elements of the treatment process and transferred through pipes to the odour control units where the air would be treated before discharging treated air through the vent stack. The applicant proposes to produce an odour management plan (OMP) to manage any odour emissions that may derive from the new STW.
34. The STW would operate continuously for 24 hours a day 7 days per week and would accommodate 10 full-time staff members and approximately 12 visitors/contractors each day. Once operational there would be approximately 36 vehicle movements to and from the site each day. The new STW would not result in an increase in vehicles movements when compared to the existing STW.

### *Construction Phase*

35. The proposal involves a number of worksite areas during the construction phase. These are located adjacent to each transfer tunnel shaft to enable the construction of the transfer tunnel, and a compound area to the north of the existing STW, adjacent to the residential area of Waterside Road, Slyfield Green and Marigold Court. A construction compound area would also be located within the new STW site and would include a site office, parking provisions, welfare facilities, materials and handling facilities as well as stockpiles. Plant and machinery such as cranes, loaders and tippers (as required) would be used at all of the construction compounds and working areas. The construction works would take place between the hours of 07:00 - 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays with

no work to be carried out on Sundays or bank holidays. During the construction of the transfer tunnel, it may be necessary for works to be carried out, outside of the agreed working hours. However, this would be for a short period and would ensure minimal disruption to local residents and businesses.

36. During the construction works, it may be necessary to provide on-site lighting. The lighting would be designed to minimise spill, outside of the construction site, and will include LED lighting units, remote powered control lighting and luminaire ratio of 0% except where upward task lighting is required. Where fixed lighting and mobile task-specific lighting is necessary, the lighting will be used and moved as required depending upon the specific construction task being undertaken.
37. The construction works are due to take 2.5 years to complete. Once the construction works have been completed a further 12 month period will be required for commissioning and testing the site. The site is expected to be fully operational by early 2026.

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## **Consultations and publicity**

### **District Council**

38. Guildford Borough Council : No objection
39. Guildford Borough Council Environmental Health Officer : The application site is a former landfill, which whilst the use is not particularly sensitive, in terms of there being no residential use, the two main issues are the displacement of any pollutants either gas or leachate. Recognise the site has been the subject of a considerable period of monitoring, there are gas ventilation systems and a gas curtain on the Slyfield Industrial Estate. All changes associated with the development will need to be coordinated with existing arrangement and is of the opinion this can be achieved. Leachate is principally the concern of the Environment Agency due to the proximity of watercourse. This will need to be engineered in coordination with any existing arrangements. Recommends conditions.
1. Guildford Borough Council Transport Development Planning
  2. Guildford Borough Council Tree Officer

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

40. Rights of Way : No objection. Draw the applicant's attention to the need for safe public access being maintained at all times and no access should be made via the footpath at any time, any down pipes or soakaways associated with the development should either discharge into a drainage system or away from the surface of the right of way, that there are to be no obstructions on the public right of way at any time and this is to include, vehicles, plant, scaffolding or the temporary storage of materials.
41. Natural England : No objection. Is satisfied that on the basis of information provided the proposal would not have a significant effect on the SPA either individually or in combination with other plans or projects.
42. Historic England : No comments to make on the proposal.
43. County Highway Authority : The highways officer requested further information with regards to operational traffic, sustainable mode access, transfer tunnel and construction traffic.

: No objection, subject to planning conditions.

Given the proposed STW replaces the existing facility, which also takes its access from Moorfield Road, there would be no increase in local traffic set against existing conditions. The proposed site will have additional sewage processing capacity to accommodate the expected population growth in the area. Operating at capacity the site is only likely to generate a further 12 movements (6 vehicles) across the day. The Highway Authority is therefore content that the development would have no material long term impact on the local transport network. Whilst the proposed site use is likely to result in a necessity for many visitors to arrive in a motor vehicle, the layout and the connecting access roads have been designed to enable pedestrians and cyclists to arrive on site. As part of the adjacent Weyside Urban Village development, bus stops will be provided in the future on Moorfield Road and this will provide a public transport option for site visitors. The proposed pedestrian accesses and pedestrian crossing facilities will enable pedestrians to walk safely to and from the bus stops. A Work Force Management Plan has been submitted detailing how the movement and parking of site operatives will be accommodated whilst minimising disruption to the highway network. This Plan sets out proposals for providing sufficient car parking on land within the existing and proposed STWs to prevent demand for on-street parking by operatives. It also sets out that a mini-bus will be used to transport operatives around the site from the parking areas, and puts forward some suggestions for encouraging non-car travel.

44. Lead Local Flood Authority : No objection subject to the imposition of conditions with regards to surface water drainage and a verification report.

45. Environment Agency : Objected on matters of the Flood Risk Assessment, biodiversity including water biodiversity and wetland environment. Requested more information on the riparian environment and how risk would be controlled. Requested further information on the river metric.

The EA has withdrawn their original objection subject to planning conditions. The EA has liaised with the applicant to resolve the outstanding issues in relation to the fish and FRA. Based on the applicants' additional submissions the EA agrees that any outstanding concerns relating to the impact on fish can be picked up in the Environmental Permit application for the operation of the outfall. The EA has no further objections to the proposed scheme subject to the inclusion of planning conditions.

46. Environmental Assessment Team : No comments received.

47. County Archaeologist : No objection. No further archaeological fieldwork is required and there is no requirement for on-site archaeological mitigation.

48. County Geological Consultant : No objection subject to conditions. Note that a number of conditions will be required for a detailed remediation strategy, a foundations and earthworks construction risk assessment, and landfill and outfall structure stability assessment, information on piling, settlement monitoring plan for the tunnel shafts and landfill rapid impact compaction, gas monitoring, management and contingency plan will be required, soil management plan will be required. A waste management plan and materials management plan will be required alongside a Construction Environmental Management Plan all by condition. Further information on drainage detail will be required. Recognise this is a Design and Build Contract and the contractors have yet to be appointed so some of the design method statements cannot be provided.

49. County Ecologist : No objection subject to a condition for the submission of a Landscape and Ecological Management Plan. Further comments have been received from the ecologist in relation to the impact of nitrogen on the SSSI at Whitmoor Common. The ecologist has confirmed that Natural England do not have any concerns and that they consider it unlikely that detectable effects on sensitive features are

likely to arise from the proposed development. As such the ecologist has no further comment.

50. County Air Quality Consultant : Further information was originally required with regards to the number of hours the generator would be used for, impact on Whitmoor Common from an air quality perspective and vehicle movements, recommend conditions requiring an Odour Management Plan to mitigate and control odours.
51. County Lighting Consultant : Note a lack of information on lighting. No objection subject to the imposition of conditions requesting a lighting scheme to be submitted.
52. County Noise Consultant : No objection subject to conditions – with regards to the construction phase, the assessment indicates that a significant impact has been identified during one of the stages, but this can be mitigated and controlled through the use of conditions. With regards to the operational phase, the assessment indicates that no significant impact has been identified. On the basis of the above, noise and vibration should not be a key determining factor for the granting of planning permission, however, using appropriate conditions to protect existing residents during construction works is important, as without appropriate mitigation significant adverse effects could occur during night-time construction works. With regards to the draft Section 61 condition, we still recommend that the local authority accepts the applicants offer of entering into a Section 61 agreement; however, as Section 61 agreements are covered under the Control of Pollution Act (CoPA) it may not be appropriate to require these via a planning condition. From a County Planning Authority (CPA) perspective, an alternative method of achieving the required noise mitigation is likely to be more appropriate. Therefore, the noise risks could be addressed by a condition requiring the applicant to submit a general Construction Environmental Management Plan (CEMP) or a noise specific Construction Noise Management Plan (CNMP).
53. Historic Buildings Officer : No objection subject to condition. Request conditions are imposed for the vent stacks and landscaping in front of the staff welfare building. Consider the heritage assets which will be affected by this application are the Wey & Godalming Navigations Conservation Area and the Grade II Burpham Court Farm. Not of the opinion there will be an impact on Stoke Lock House, provided the nearby vent stack is an appropriate colour. Consider there will be less than substantial harm to the character and appearance of the Wey & Godalming Navigations Conservation Area. There will also be less than substantial harm to the setting of the Grade II listed Burpham Court Farm. Specifically, this harm will be from the urbanisation of the building's setting through the construction of new buildings on the STW site including the Staff Welfare Building. Taking into account the existing buildings on the site, the proposed landscaping and amendments to the Sludge Cake Storage Silos, consider this to be a low form of less than substantial harm.
54. Planning Casework Unit : No comments to make on the proposal.
55. Forestry Commission : No objection refers to Standing Advice for ancient woodland.
56. Surrey Wildlife Trust (SWT) : Objection, SWT have raised an objection to the proposal stating that the Trust's concerns with the proposal is that at the point of discharge, Burpham Court Farm river loop is an unmodified stretch of river which maintains natural river processes that support good quality instream habitats suitable for various species of birds; mammals; fish and invertebrates. The natural course of the river at this location provides a refuge for wildlife away from the canalised navigation, where natural instream habitats are not present. Areas like this can be nursery grounds for fish species and provide much needed gravel habitat for invertebrates to live in. This river loop is also an important site for over wintering wild fowl. The River Wey is understood to flow in a north/east direction towards the River Thames and an increase in effluent may therefore

have an adverse impact to locally important habitat and species included within the River Wey SNCI, particularly as Burpham Court Farm is a relatively undisturbed loop of the Wey. Any impacts on the water quality from storm overflows will be damaging to species mentioned above, with recovery of invertebrate populations likely to be extremely slow due to the isolation of this site by the navigation. The site is located within a biodiversity opportunity area River Wey and tributaries; which identifies potential habitat restoration and creation projects as including floodplain grazing marsh creation/restoration plus in-channel enhancements on the River Wey. The applicant may also wish to give consideration as to how the proposals can contribute towards such habitat restorations. The biodiversity net gain assessment submitted with the application sets out that the site will provide 10% net gains offsite. The Trust supports Surrey Nature Partnership's recommendation for the Local Planning Authority to adopt a minimum of 20% net gain, which is considered appropriate and necessary for Surrey. If herbicides are to be used, glyphosate herbicide is understood to be safe to use near water. The Trust would advocate using more sustainable methods of management, rather than the use of herbicides.

57. County Landscape Architect : No objection subject to conditions. The LVIA is a generally robust and thorough assessment of the likely landscape and visual effects of the proposed development. The development would have an urbanising influence on the surrounding landscape to a certain degree, due to the presence of some of the new industrial STW infrastructure in views from the undeveloped land to the north and north-east. In comparison to the existing industrial estate development, the substantial STW development will increase the contrast between the undeveloped floodplain and riverside area and the edge of the built-up area of Guildford, as the STW has a greater footprint and height and is sited closer to the tree belt wrapping around the north and east of the industrial estate. Visibility would be greater during the winter months due to the lack of leaf cover allowing some filtered views through the intervening tree belt, but the taller STW elements would be visible year-round above the canopy line. Over the short to medium term the landscape mitigation planting and management would increase the level of screening surrounding the STW site but will not eliminate all adverse effects over the long term. There would be significant adverse landscape and visual effects during the construction period. Once the development is operational, residents of Burpham Court Farm would experience a significant adverse visual effect until approximately year 15, when screening from intervening vegetation would have increased. The main long-term residual effects of the development include minor adverse effects on landscape character through impacts on the setting and tranquillity of neighbouring land, including the highly sensitive floodplain and River Wey / Wey Navigation; and minor adverse effects on local views (public and private) through visibility of the above-ground structures of the STW (in particular the taller elements which rise above the surrounding tree belt). The impact on landscape should be given appropriate weight in the overall planning balance. Should planning permission be granted, recommend a condition for a Landscape and Ecological Management Plan (LEMP) and for hard and soft landscape planting. Retained trees should be protected as set out in the Arboricultural Impact Assessment. Use of neutral recessive light grey finishes should be used on above ground structures and appropriate finishes to the vent stacks and RAL colours agreed with the County Planning Authority. Note additional new tree planting adjacent to the north eastern elevation of the welfare building and this is an improvement to the original design.
58. County Arboriculturist : No objection, the tree impact is moderate to significant, however, this is expected on an infrastructure project of this scale.
59. Thames Water : No comments to make
60. Southern Gas Network : No views received
61. National Trust River Wey : No views received
62. Health and Safety Executive : Does not advise on safety grounds, against the granting of planning permission in this case.

## Parish/Town Council and Amenity Groups

63. Worplesdon Parish Council : No views received
64. Burpham Community Association : No views received
65. Guildford Society : Object on the grounds that the visual impact has been inadequately explored and it should be more focused on design and landscaping to lessen the impact and visualise the proposal. Like discharge of effluent into River Wey to be designed out of the proposal. Would like Guildford Borough council to arrange public consultation.
66. Guildford Waterside Centre : No views received
67. Burpham Neighbourhood Forum : Object. Concerned that the visual impact assessment has not correctly assessed the visual impact from the Nature Reserve (eastern side of the site), particularly during the winter months when foliage is considerably reduced. The submitted viewpoints indicate that the existing tree line has been removed 'for clarity'. If the trees had been left in situ, it would be clear that the built form protrudes well above the tree line. The result is a misleading photomontage. There are residential properties on Bowers Lane, yet no Viewpoint has been submitted for this area. There is also no viewpoint supplied for Clay Lane despite being an important road in the vicinity with open fields allowing for substantial views towards the application site. The planning application does not give sufficient weight to the importance of the River Wey which along with the Navigations, is an important local Heritage Asset. The historic value of the flowing river should be properly assessed, not just listed buildings. Concerned the proposals do not present a comprehensive scheme for removal of existing leachate on site. As compaction and hammer piling is proposed, concerned for the opportunity for existing pollution to enter ground water. In our view the application site must be fully remediated before being developed. The proposal should show clearly how it will meet environmental standards and be able to achieve the requisite environmental permits. Concerned that the financial cost of meeting these environmental requirements is greater than shown, and as such this raises questions about the economic viability of the project. Doubts exist about whether the site is 'safe to disturb' at this time and in the near future, and whether it is stable enough in general given the current build-up of gases, leachates, decomposing materials and voids. Little consideration appears to have been given to the potential collapse of the embankments during the dewatering phase. Concerned about the impact of corrosive leachate on those piles, i.e., its degradation of concrete and steel, all of which raises questions about the longevity of those supports. Concerned about the effectiveness of the embankment surrounding the site, question the stated 'angle of repose': at the angle stated, the outer face of the embankment is appears to be at risk of sliding.
68. Guildford Residents Association : Object as Thames Water has a poor record of discharging untreated and inadequately treated sewage and wastewater. Communication has been poor, public meetings should be set up. Large structure visible from A3, Green Belt, Wey navigation, nature reserve. Landscape assessment inadequate. No consideration of views from Surrey Hills AONB along Merrow Dows. Scheme should be presented in VuCity. Further consideration of roof materials and colours are needed. The buffer, screening and fencing unsuitable/inadequate. The proposals will cause harm to river. Transfer tunnel should be 10m away from River Wey. The lighting plan does not give enough consideration to impact on the wildlife and landscape. The control of pollution during construction and remediation is a concern, especially in view of the riverside location and movement of water through the site to the Wey and its floodplain. Groundwater and river water quality monitoring will be required. Assurances are needed on design capacity in relation to need and demand for foul water and sewage treatment, growing frequency of high magnitude rainfall events associated with climate change, and the adequacy of a sequence of mitigation practices that reduce the need for stormwater discharges of inadequately treated overflow discharges to very rare and truly exceptional

circumstances. Soakaways are not recommended in the area of landfill due to the potential to drive leachates towards the river. A clear, enforced drainage management strategy, with a series of treatment options to reduce risk of pollution to groundwater, and an accompanying risk assessment, are required. The issue of land stability. Assurances are sought that best practices will be applied in minimising pollution and other impacts from vehicles during contraction and operation. Further, assurances are sought that use of this facility will be confined to treatment of local sewage and wastewater. Has consent for the works and outfall been obtained from the National Trust which holds the Wey Navigation inalienably?

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

69. The application was publicised by the posting of 6 site notices around the extent of the planning application boundary ; and an advert was placed in the local newspaper. There have been two further rounds of publicity and neighbour notifications including notifying those that have made representations on the planning application. A total of 1118 owner/occupiers of neighbouring properties and businesses were directly notified by letter. 13 letters of representation have been received. 8 letters of objection have been received raising the following concerns:

### Objection:

- *Permits and Planning* – a series of environmental permits will be required in addition to planning permission. It would be rational for a demonstration of testing of environmental permits acceptability before progressing further. The permits should run parallel such that it is tested alongside the application such that it is known prior to planning permission that the site will pass the permit testing regime.
- *Sewage Treatment Work Capacity* – the cost of meeting these environmental concerns will raise costs above those previously calculated for which the LPA is funding. The project should be cancelled prior to further expenditure being accumulated.
- *Health and Safety* – the land is unsafe in its current form instability is from four base components; gas, leachate, decomposing materials, voids. No indication is given if site is physically stable enough to actually work on in safety, once it has been dewatered (leachate removal). Can the land actually support the weight of piling machines or compaction machinery across the whole site without releasing toxic gases or causing embankments to collapse with overall loss of the dump integrity. Energy ratio of test piles has a 12% spread which needs considering from 72- 84%.
- *Land level* – *the proposal will result in toxic gas release into the atmosphere, rising leachate levels above current levels over 1m above the flood plain. Decomposition or unidentified materials will continue for tens of years so 20% instability will remain.*
- *Embankments* – little consideration as to the effects of embankment's potential to collapse during dewatering. Leachate removal is missing from the documentation / equation just keeping an eye on its level, is simply not a realistic solution. Constant refill of voids within the decomposing materials by rain water. As the level rises and falls re-energising the chemical reactions generating the gas and degradation of the decomposing materials.
- *Piling* – contaminated with corrosive leachate. Potentially degrade the pilings either concrete or steel raises a question on longevity of the support for the STW structures. If the site is not dewatered prior to piling it will permit leachate to enter the London clay. Where will the leachate go as the riser is installed in the centre of this fermenting mass does not appear to be covered. It is implied that the tunnel will go through the London Clay until it reaches the refuse, then emerge through it and the leachate. Longevity of riser is also questionable if the leachate is corrosive to the concrete piles.

- *Embankment* – site is known to be leaking since pre 2000. The injection of compaction with a liquid acting as a lubricant to the embankment could cause collapse and contamination.
- *Transport* – 10 plus metres possibly 15 metres long piles will be required – essential that signage is in place on the A3 Burpham Slip South bound prohibiting HGV for the new STW attempting to negotiate Clay lane. The transport plan does not make provision to prevent use of HGVs accessing the new site.

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## **Planning considerations**

### **Introduction**

70. The guidance on the determination of planning applications contained in the Preamble/Agenda frontsheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs.
71. In this case the statutory development plan for consideration of the application consists of the Surrey Waste Local Plan 2019-2033 (SWP), the Guildford Local Plan: Strategy and Sites 2015-2034 (GLPSS), and saved policies within the Guildford Local Plan 2003 (GLP).
72. 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). For planning applications accompanied by an Environmental Statement (ES) the environmental information contained in it will be taken into consideration and reference will be made to it. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. In this case the main planning considerations are: Waste Management; Environment and Amenity; Heritage and Conservation Area; Landscape and Visual Impact; Ecology; Stability and Geotechnical; Noise; Air Quality; Odour; Residential Amenity; Surface Water Drainage; Highways and Transport.

### **ENVIRONMENTAL IMPACT ASSESSMENT (EIA)**

73. The development is considered to fall within the terms of paragraph 11(c) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. The applicant has submitted an Environmental Statement (ES) to comply with Regulation 3 of the EIA regulations 2017. That regulation prohibits the granting of planning permission for EIA development unless the relevant planning authority has first taken the environmental information into account. The 'environmental information' to be taken into account includes, but is not limited to, the ES and any further information provided by the applicant.
74. Paragraph (3) of Regulation 18 of the EIA Regulations sets the minimum standard for the information to be included in the ES. This includes a description of the proposed development (Regulation 18(3)(a)), a description of the likely significant effects of the proposed development on the environment (Regulation 18(3)(b)), a description of any features of the development or other measures that would be used to avoid, prevent, or reduce and if possible offset likely significant adverse effects on the environment (Regulation 18(3)(c)), a description of the reasonable alternatives to the development considered and provide an indication of the main reasons for the option taken (Regulation 18(3)(d)), to be accompanied by a non-technical summary (NTS) that includes an overview of the information set out in (Regulation 18(3)(e)), and the information set out in Schedule 4 to the EIA Regulations as is relevant to the development concerned and the environmental features likely to be significantly affected by the scheme (Regulation 18(3)(f)).

75. Paragraph (4) of Regulation 18 of the EIA Regulations requires that submitted ESs be based on the most recent relevant scoping opinion or direction, include the information necessary for the reaching of a reasoned conclusion on the likely significant effects of the development on the environment, be subject to scrutiny by the Mineral and Waste Planning Authority's (MWPA) technical advisers, statutory consultees and the general public through the planning application consultation process; and be prepared taking into account the results of any relevant and reasonably available environmental assessments. Paragraph (5) of Regulation 18 of the EIA Regulations places obligations on the developer in respect of the competence of the persons appointed to prepare the ES and must ensure that the ES is prepared by competent experts and be accompanied by a statement outlining the relevant expertise or qualifications of the appointed experts.
76. Regulation 26(1)(d) of the EIA Regulations advises that when granting planning permission for EIA development planning authorities should consider whether it would be appropriate to impose monitoring conditions. The National Planning Practice Guidance (NPPG) advises that duplication of monitoring requirements should be avoided, with existing regimes being used where feasible, that monitoring measures should be proportionate and that monitoring should not be used to gather general environmental information.
77. The County Environmental Assessment Officer (EAO) has reviewed the submitted ES and ES addendums and considered that they provide sufficient information to comply with the minimum information requirements set out in Regulations 18 of the EIA Regulations 2017 (as amended). The submitted ES and ES Addendums provide such information listed in Schedule 4 of the Regulations as is relevant to the specific characteristics of the proposed development and the environmental features likely to be significantly affected (Regulation 18(3)(f)).

## WASTE MANAGEMENT

### ***Surrey Waste Local Plan 2020***

Policy 1: Need for Waste Development

Policy 2: Recycling and Recovery

Policy 10: Areas Suitable for development of Waste Management Facilities

Policy 11a: Strategic Waste Site Allocation

Policy 12: Wastewater Treatment Works

### ***Guildford Borough Council Local Plan: Strategy and Sites (2015-2034) (GLPSS)***

Policy S1: Presumption in Favour of Sustainable Development

Policy A24: Slyfield Area Regeneration Project, Guildford

Policy ID1: Infrastructure and Delivery

### ***Guildford Borough Council Local Plan (2003): Saved Policies***

Policy G1: General Standards of Development

78. The proposed development forms part of the Slyfield Area Regeneration Project (SARP) which is a mixed-use project and includes the delivery of 1,500 homes of which 1,000 homes (C3) will be delivered within the plan period, 6 Gypsy and Traveller pitches, approximately 6,500 sq. m light industrial (B1c) / trade counters (B8) and new council waste management depot (relocated on site) and new or enhanced waste management facilities (including a waste transfer station and a community recycling centre) and new sewage treatment works and community facilities (D1). The SARP development is expected to be brought forward through three separate planning applications.
79. The spatial strategy for the future development of the site is set out in Policy A24 (Slyfield Area Regeneration Project, Guildford) of the adopted Guildford Borough Local Plan: Strategy and Sites (April 2019) (GLPSS).
80. The existing STW is located on a significant part of the SARP allocation site. It is therefore being proposed that the STW be relocated to land north east of the Slyfield Industrial Estate. This would allow for the existing site to be redeveloped as part of the Weyside Urban Village proposal, application reference 20/P/02155, submitted to Guildford Borough Council in October 2021 and granted planning permission in March 2022.

81. The existing STW will be relocated to land north east of the existing site. This land has previously been used as a landfill site and as such it cannot be used for residential development. The new STW must be fully operational before the existing site can be decommissioned and developed as part of the WUV development.
82. Paragraph 7 of the NPPF explains that the purposes 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 achieve; economics, social and environmental. The economic objective includes the need to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity and the environmental objective involves the minimisation of waste and pollution.
83. Paragraphs 119 and 120 of the NPPF states that planning decisions should promote an effective use of the land in meeting the need for homes and other uses; encourage multiple benefits from urban land through mixed use schemes; give substantial weight to the value of using suitable brownfield land for homes; support the remediation of contaminated land.
84. The National Policy Statement for Waste Water (2012) identifies that waste water infrastructure is essential for public health and a clean environment. It also highlights that new waste water infrastructure may also have socio-economic impacts associated with the creation of jobs and training opportunities.
85. 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.
86. The SWLP includes a Spatial Strategy for Waste Development in Surrey. Paragraph 4.1.1.1 states that "The Plan seeks to ensure net self-sufficiency. This means providing sufficient waste management infrastructure to deal with the equivalent amount of waste to that arising in Surrey, taking account of existing safeguarded capacity." Paragraph 4.3.2.1 explains that sites considered suitable in principle for the development of additional waste management facilities are allocated in the Plan. The allocation of sites is intended to provide certainty that there is suitable land within Surrey that would be developed to meet future waste management capacity requirements.
87. Policy 1 of the SWLP states that development of new waste facilities will be granted where it can be demonstrated that the proposed development will contribute to achieving targets for recycling, recovery and the diversion of the waste away from disposal in a manner that does not prevent management of the waste at the highest point practical in the waste hierarchy. Policy 2 of the SWLP states that planning permission for the development of recycling and recovery facilities and any other associated development will be granted where the site is allocated in the SWLP for waste development and/or the site is suitable when assessed against Policy 10 of the SWLP and other policies within the Plan.
88. Policy 10 of the SWLP states that planning permission will be granted for the development of waste facilities at locations including land that is otherwise suitable for waste development when assessed against other policies in the Plan.
89. Policy 11a of the SWLP states that planning permission will be granted for development of facilities to meet identified shortfalls in waste management capacity in Surrey at land to the north east of Slyfield Industrial Estate, Guildford.

90. Policy 12 of the SWLP states that planning permission for the development of new Wastewater and Sewage Treatment Works (including sewage sludge management) or for the improvement or extension of existing Wastewater and Sewage Treatment Works will be granted where i) the need cannot be practicably and reasonably met at an existing site and ii) Biogas resulting from any anaerobic digestion of sewage sludge, will be recovered effectively for use as an energy source using best practice techniques.
91. Policy S1 (Presumption in Favour of Development) of the GLP reflects the provisions within paragraph 11 of the NPPF, acknowledging that development proposals that accord with an up-to-date development plan should be approved without delay unless any adverse impact of doing so would significantly and demonstrably outweigh the benefit.
92. The application is for the construction and operation of a new sewage treatment works and associated above and below ground infrastructure, including new final effluent and storm water outfall, and new transfer tunnel. The proposal includes the relocation of the sewage treatment works to a site north-east of the existing site.
93. The development forms a critical part of the Slyfield Area Regeneration Project (SARP) and is allocated for development of waste management capacity within Policy 11a of the Surrey Waste Local Plan.
94. The proposal is likely to bring benefits such as improved sewage treatment facilities to allow for the population growth within the Guildford catchment. The proposal will also enable the delivery of a mixed use development enabling economic, social and environmental opportunities as well as the delivery of 1500 homes.
95. The application would enable the applicant to continue its statutory waste obligations within the locality providing improved waste services. In addition the proposal would allow for the existing landfill site to be effectively used.
96. The Guildford Borough Council strategic development framework SPD (July 2020) identifies that in order to safeguard and enhance the overall prosperity of Guildford, it is essential that sites allocated within the Guildford Local Plan deliver the highest possible quality homes, placemaking and infrastructure; the focus should be towards encouraging a philosophy of town building to achieve integrated, healthy and beautiful neighbourhoods where communities can grow and prosper. Providing appropriate sites and resilient infrastructure, such as the new STW, is an integral element of this process.
97. The need to relocate the STW to facilitate the delivery of 1500 new homes on the existing STW and surrounding land has been demonstrated. Given that the application site is a strategic waste site, allocated within the SWLP the waste management need is acceptable and must be given the necessary weight in the assessment.
98. On balance, the proposal would accord with Policies 1, 2, 10 and 11a of the SWLP, Policies A24, S1 and IDI of the GLPSS, Saved Policy G1 of the GLP, NPPF and NPPW.

## **ENVIRONMENT AND AMENITY**

### **Surrey Waste Local Plan 2019-2033 (SWLP)**

Policy 12: Wastewater Treatment Works

Policy 13: Sustainable Design

Policy 14: Protecting Communities and The Environment

### **Guildford Local Plan: Strategy and Sites (2015-2034) (GLPSS)**

Policy P4: Flooding, Flood Risk and Groundwater Protection Zones

Policy P5: Thames Basin Health Special Protection Area

Policy D1: Place Shaping

Policy D2: Climate Change, Sustainable Design, Construction and Energy

Policy D3: Historic Environment

Policy ID3: Sustainable Transport for new development

Policy ID4: Green and Blue Infrastructure

Policy P4: Flooding, Flood Risk and Groundwater Protection Zones

Policy P5: Thames Basin Heaths Special Protection Area

**Guildford Borough Local Plan (2003) Saved Policies (GLP)**

Policy G1: General Standards of Development

Policy G11: The Corridor of the River Wey and the Guildford and Godalming Navigations

Policy HE4: New Development which Affects the Setting of a Listed Building

Policy HE7: New Development in Conservation Areas

Policy HE10: Development which affects the setting of a Conservation Area

Policy HE12: Historic Parks and Gardens

Policy NE4: Species Protection

Policy NE5: Development affecting Trees, Hedges and Woodlands

Policy NE6: Undesignated Features of Nature Conservation Interest

**National Planning Policy Framework – paragraph 120(c), 152, 154, 157, 158, 159, 166, 167, 169, 174, 183(a), 185**

**National Policy Statement for Waste Water (2012)**

**National Planning Policy for Waste (2014)**

99. Chapter 15 of the National Planning Policy Framework (NPPF) refers to conserving and enhancing the natural environment. Paragraph 174 states that decisions should contribute to and enhance the natural environment by, minimising impacts on and providing net gains for biodiversity, including by established coherent ecological networks that are more resilient to current and future pressures; preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and remediating and mitigating despoiled, degraded, contaminated and unstable land, where appropriate. Paragraph 183(a) further states that planning decision should ensure that a site is suitable for its proposed use taking account of ground conditions and risks arising from land instability and contamination.
100. Appendix B of the NPPW2014 states that in determining planning applications, waste planning authorities should consider the type and scale of the envisaged waste management facility, as well as:
- The protection of water quality, resources and flood risk management. Considerations will include the proximity of vulnerable surface and groundwater or aquifers.
  - Landscape and visual impacts. Considerations will include the potential for design led solutions to produce acceptable development which respects landscape character, and the need to protect landscapes or designated areas of national importance.
  - Traffic and access. Considerations will include the suitability of the road network and the extent to which access would require reliance on local roads.
  - Air emissions, including dust. Considerations will include the proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled through the use of appropriate, well-maintained and well managed equipment and vehicles.
  - Noise, light and vibration. Considerations will include the proximity of sensitive receptors. Intermittent and sustained operating noise may be a problem if not properly managed, and potential light pollution aspects will also need to be considered.
  - Potential land use conflict. Likely proposed development in the vicinity of the location under consideration should be taken into account in considering site suitability and the envisaged waste management facility.

**Heritage including Conservation Area**

101. Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.
102. One of the core principles of the NPPF is that heritage assets should be conserved in a manner appropriate to their significance. Paragraphs 189-199 sets out the framework for decision making in relation to heritage assets and this application takes account of the relevant considerations in these paragraphs. Paragraph 195 sets out that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development affecting the setting of a heritage asset) taking into account the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal'.
103. Paragraph 199 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 200 goes on to note that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'.
104. Paragraph 202 of the NPPF outlines that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
105. The NPPF defines the setting of a Heritage Asset within the glossary, as the surroundings in which a Heritage Asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Guidance on the setting of Heritage Assets can be found in the Historic Environment Good Practice Advice for Planning Note 3: The Setting of Heritage Assets, Historic England (December 2017). Paragraph 9 of this document makes clear that setting is not itself a Heritage Asset and its importance lies in what it contributes to the significance of the Heritage Asset or to the ability to appreciate that significance.
106. Policy D3 of the GBLP sets out that "The historic environment will be conserved and enhanced in a manner appropriate to its significance. Development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough's heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported". The policy also sets out that the "The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF".
107. Saved Policy G11 (The Corridor of the River Wey and the Guildford and Godalming Navigations) of the GLP states that development within the corridor will be permitted provided that it protects or improves the special character of the River Wey and Guildford and Godalming Navigations, in particular their historic interest as one of the earliest schemes to enhance navigation of natural rivers. Saved Policy HE7 (New Development in Conservation Areas) states that new development should preserve or enhance the character or appearance of the conservation area and applicants should give consideration to the criteria listed under Policy HE7.

108. Policy HE10 of the GLP sets out that “The borough council will not grant planning permission for development which would harm the setting of the conservation area, or views into or out of that area”.
109. Policy 14 of the SWLP requires waste development to be consistent with relevant national planning policy with respect to nationally important heritage assets. The policy further states that planning permission for waste development will be granted where it can be demonstrated it would not result in unacceptable impacts on communities and the environment including the historic landscape. This includes sites or structures of architectural or historic interest and their settings, and on sites of existing or potential archaeological interests or their settings.
110. The setting of a Heritage Asset is defined in the NPPF glossary as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. A setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or it may be neutral. Historic England’s Good Practice Planning Note (3) explains that the extent and importance of setting is often expressed by reference to visual considerations. Views of or from the asset will play an important part.
111. A Heritage Baseline Assessment (HBA) has been submitted in support of the application and forms part of Appendix 8.2 of the ES. The County Historic Buildings Officer (CHBO) has reviewed the content of the HBA and considers it to be sufficient to meet the requirements of the NPPF.
112. There are no known heritage assets recorded within the application site boundary and the proposal would not result in the alteration or demolition of a listed building. Most of the assets identified within the ES would be unaffected by the proposal due to existing screening from the natural and built environment and also the distance between the assets and the development site. Therefore, it is appropriate to assess whether the proposal would harm the setting of the heritage assets and/or their significance.
113. Special regard has to be had to the character and appearance of the conservation area and the setting of the nearby listed buildings, as set out in accordance with Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Consideration must also be given to the impact on the undesignated heritage assets under paragraph 203 of the NPPF.
114. The HBA has identified 70 historic environment assets within 1km of the application site. These include 12 archaeological remains, 41 historic buildings and 17 Historic Landscape Types. There are no known archaeological remains, registered battlefields or world heritage sites located within the application site. A scheduled ancient monument and registered Park and Garden is within 1km of the application site.
115. The HBA considers that three built heritage assets have the potential to be affected by the development, these include; Burpham Court Cottages (Grade II), Wey & Godalming Navigation Conservation Area (WGCA) and Stoke Lock House (Undesignated Heritage Asset). The County Historic Buildings Officer (CHBO) agrees with this assessment.

#### *Burpham Court Farm and Cottages*

116. Burpham Court Cottages are Grade II listed buildings located north of the application site. The two storey cottages date to the early 17<sup>th</sup> century with 19<sup>th</sup> century extensions to the western end. The buildings are timber framed on rendered plinth, with exposed brick infill and a red brick extension. The buildings form part of a larger farmstead, parts of which still remains. The significance of the cottages are their survival as historic dwellings within the farmstead which is evident in its surviving historic fabric and relationship with the surrounding dwellings.

117. The cottages are located within a complex of buildings adjacent to the Wey Navigation. Beyond the immediate context of the cottages, the green meadow corridor of the Wey Navigation forms the setting for the building. The application site lies beyond the green corridor and makes a contribution to the significance of this asset.
118. The setting of the cottages includes views towards the meadowlands, in front of Slyfield Industrial Estate, which gives the building its rural surroundings and reveals its historic usage. Some harm has been caused to the surrounding views as a result of the existing industrial buildings, which can be seen from beyond the trees at the industrial estate.
119. The proposal would not result in the alternation or demolition of the listed buildings, as such it is appropriate to assess whether the proposal would be harmful to the building's setting. Owing to its scale, proximity and lack of tree screening, the proposed development will be more visible from the listed building than the existing industrial units. In particular, the large staff welfare building, proposed along the north-western corner of the site, will be located within a prominent location. This building will be directly visible from Burpham Court Farm.
120. The CHBO considers that harm would be caused to the setting of the listed building as the proposed development will have an urbanising impact on its surroundings. In particular, the proposed staff welfare building which will be visible all year round.
121. The location and appearance of the welfare building was a key consideration throughout the design process. The building has been strategically placed within the north-western corner of the site to ensure that the sewage treatment process is not compromised and that future expansion of the site can take place. Whilst other locations, within the application site, have been considered it was concluded that the alternatives were not appropriate.
122. The welfare building has been designed to meet the operational requirements of the STW and similar facilities are provided at the existing site. Due to the operational requirements, it would not be possible to reduce the size and scale of the building.
123. To reduce the harm to the setting of the listed building, the CHBO has suggested that the building be cladded in cedar wood. The applicant has considered the use of cedar wood and advised that this could result in the building being darker in colour, due to the natural weathering of the cladding. A darker appearance would result in the building being more prominent on site and such this has been discounted.
124. The applicant has proposed further mitigation measures in order to reduce the harm, this includes cladding the welfare building in a grey neutral recessive colour (goosewing grey) and introducing additional evergreen planting in the north-western corner of the site.
125. The mitigation measures suggested by the applicant are considered to be acceptable and would minimise the visibility of the development, reducing the impact on the listed building.
126. The CHBO has concluded that less than substantial harm would be caused to the setting of the Grade II listed building, if the proposed mitigation measures are applied. The officer is therefore content with the suggestions proposed and has requested that appropriate planning conditions be applied to ensure that the mitigation measures are implemented.

#### *Stoke Lock House*

127. Stoke Lock House is a non-designated heritage asset which is located adjacent to the application site boundary and within the Wey and Godalming Conservation Area (WGCA). The building is yellow brick with intermediate red bricks, segmented arched windows on the ground floor and flat headed window above, dating to 1888.

128. The building is located within a predominantly rural setting with attractive corridors framed with mature trees. The building makes a positive contribution to the Conservation Area, owing to its use of traditional design elements, associated with Surrey. As a non-designated heritage asset changes to the setting of the building should be considered in line with national and local planning policy.
129. The ES describes the impact on the building as being medium with a minor adverse impact. No physical impacts on the setting of Stoke Lock House are predicated during the construction of the new STW. However, it is predicated that there is a high potential that construction works will be visible and audible from the building. Although there may be some noise intrusions to the setting, during construction works, these intrusions would be temporary and are considered to have a minor adverse impact on the value of this asset.

*The Wey and Godalming Conservation Area (WGCA)*

130. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to be given to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising planning functions.
131. The proposed STW is situated along the eastern edge of the WGCA and forms part of the setting. The application site is generally screened by an avenue of trees that enclose the Conservation Area. The conservation area and non-designated heritage asset (Stoke Lock House) make a positive contribution.
132. The area is significant as it was one of the earliest waterways to be made navigable and represents a very important corridor through Surrey, linking the commercially developed suburban areas with open countryside.
133. The WGCA consists of two sections of river navigation. The first opened from the River Thames to Guildford in 1651 and the second to Godalming in 1760. The navigations were highly important for transportation from 1770s through to the 1840s when they started to suffer competition from the railway.
134. The navigation has had a significant influence on local history, commerce, townscape and landscape from Weybridge to Godalming. Key features which reveal the character of the Conservation Area include the navigations themselves, adjacent development and, in places, the rural landscape such as Burpham Meadows. Stoke Lock House, which dates to 1888 is one of the buildings which make a particularly positive contribution to the Conservation Area owing to its use of traditional design elements.
135. The STW will be largely hidden behind established and planted landscaping, although the transfer tunnel vent stacks would be visible from the conservation area, resulting in a visual intrusion into the Wey Corridor. To reduce the visual harm, the CHBO has suggested that the vent stacks be painted a neutral recessive light grey colour (goosewing grey) to reduce their visibility from the conservation area. The applicant is in agreement with this.
136. In addition to the visual intrusion, the proposal will also result in an increase in ambient noise, light levels and odour, which are considered to be harmful to the setting. To minimise the harm caused by the operational lighting, the CHBO has suggested that a planning condition be imposed, requiring details of the lighting to be submitted to the CPA.
137. As a result of the proposed development, the CHBO considers that less than substantial harm will be caused to the character and appearance of the WGCA. The less than substantial harm will be as a result of the limited views of the development from the River Wey Navigation, particularly during the winter months and the associated noise and lighting from the site. The officer has further concluded that such harm would be low due to the limited visibility of the buildings/structures and the existing wider developments

within the Slyfield Industrial Estate. The proposed mitigation measures including the additional planting and painting of the vent stacks would further reduce the harm.

138. The ES and planning statement have identified the harm to the heritage asset as being less than substantial.

### *Conclusion*

139. In accordance with paragraph 194 of the NPPF, the applicant has described the significance of the heritage assets affected by the proposal and included contributions made by their setting.
140. In accordance with paragraph 195 of the NPPF, officers have considered the impact the proposed development will have on the Heritage Assets identified, including their setting, and concluded that the impacts would result in a low degree of less than substantial harm.
141. Having given great weight to paragraph 199 of the NPPF, the public benefits of the scheme include improved infrastructure for existing and future residents of Guildford and the facilitation of the delivery of a regeneration project, as part of the SARP, are considered to outweigh the less than substantial harm caused to the heritage assets and their setting. The proposal is therefore considered to accord with paragraphs 195, 199, 200 and 202 of the NPPF and Policy 14 of the SWLP; Policy D3 of the GLPSS and Saved Policies G11, HE4, HE10 and HE12 of the GLP

### **Archaeology**

142. Policy D3 of the GLP refers to the historic environment and states that it will be conserved and enhanced in a manner appropriate to its significance.
143. The applicant engaged in pre-application consultations with the County Archaeological Officer (CAO) in July 2020. The consultation included appropriate methodologies for archaeological evaluation to further define archaeological potential within the development.
144. Chapter 8 of the ES sets out the findings of the assessment of the development on the Historic Environment. The legislation and policies which inform the assessment are set out within section 8.2 whilst section 8.3 describes the consultations undertaken by the applicant with both statutory and non-statutory consultees. Section 8.4 sets out the methodology used to undertake the assessment.
145. A Heritage Baseline Assessment (HBA) prepared by Orion Heritage and submitted as part of the ES identifies that the majority of the construction works are confined to areas of existing landfill. Any remaining archaeological potential is confined to the route of the proposed outfall to the *River Wey*, north of the site. The history of the study area is set out within the HBA (Appendix 8.2 of the ES).
146. An initial deposit model was prepared by Wessex Archaeology and submitted as part of the supporting documentation to the ES. This model examined site investigation data in relation to the below ground archaeological potential within the area of the outfall route. The investigations confirmed that there is potential for deposits dating from the early prehistoric period. Further investigations were carried out which consisted of geo-archaeological evaluations combining trial trenching, test pits and geo-archaeological boreholes with proposed shaft locations. These were carried out within the corridor route and the findings submitted as supporting documentation to the ES (Appendix 8.3).
147. No evidence of archaeological deposits were found to be within the development corridor, however, a complex sequence of quaternary deposits along the footprint of the outfall pipelines were revealed.

148. A extensive programme of archaeological work has been carried out by the applicant and it has been demonstrated that it is unlikely that significant archaeological remains will be present within the development site. The proposed environmental analysis provides an appropriate level of mitigation against the effect on below ground deposits and as such no further archaeological fieldwork will be required and no on-site archaeological mitigation works will be required during the construction phase.
149. The ES has also identified that there is the potential for minor effects, which are not significant, on archaeological remains during construction of the outfall pipe and transfer tunnel, however, none of the effects assessed are significant. The potential loss of upper Palaeolithic remains has been mitigated through archaeological investigations which have determined that there is little in the way of significant deposits that will be adversely affected by the development. With the mitigation proposed the ES considers the effects to be neutral.
150. The County Archaeology Officer (CAO) has reviewed the ES and supporting documentation. He has raised no objections to the proposal, however, a planning condition for the submission of a paleoenvironmental assessment and dating report is recommended.

### *Archaeology Conclusion*

151. The public benefits of the proposal are considered to outweigh the less than substantial harm, identified as impacting the designated heritage assets.
152. The proposal is considered to meet the requirements within paragraphs 200 and 202 of the NPPF as well as local plan policy requirements for assessing heritage assets. With the implementation of mitigation measures, proposed by the applicant and subject to planning conditions, the proposal is considered to be in accordance with Policy 14 of the SWLP; Policy D3 of the GLPSS and Saved Policies G11, HE4, HE10 and HE12 of the GLP.

### **Landscape and Visual Impact**

153. Policy 13 of the SWLP states that proposals for waste development should 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 provisions. 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 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.
154. Policy A24 of the GBLP2019 identifies the SARP site as a site allocation for mixed use redevelopment, including the relocation of the STW. Requirements under Policy A24 include “sensitive design at site boundaries that has significant regard to the transition from urban to Green Belt, particularly with regards to the open fields between Clay Lane and the site and the visual setting of the Navigations and the River Wey Conservation Area”. Saved Policy G1(12) of the GBLP2003 required development to be designed to safeguard and enhance the landscape and existing natural features. Saved Policy G11 states that development within the corridor will be permitted provided that it protects or improves the special character of the River Wey, in particular its visual setting, the special character of the landscape in the corridor is protected or improved; and views from both within and from the corridor which contribute to its special character are protected or improved.
155. Paragraph 174 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services; and minimising impact on and providing net gains for biodiversity, including by establishing coherent ecological networks

that are more resilient to current and future pressures. 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; and development resulting in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees, should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

156. A landscape and visual impact assessment (LVIA) has been submitted in support of the application and forms part of Appendices 9.1 – 9.6 of the ES. The LVIA has been produced in accordance with the Guidelines for Landscape and Visual Impact Assessment third edition. The LVIA recognises that key landscape features within or very close to the application site that would be directly affected by the development.

### ***Landscape Character***

157. The application site is situated on land that has been previously developed and used in connection with gravel extraction and subsequent landfill. The site is currently open with an extensive group of semi-mature trees surrounding the northern part of the site providing valuable screening between the built-up area of the industrial estate and the proposed STW.
158. There are no landscape designations covering the application site. The new STW falls within the Guildford Urban area on land allocated for development and safeguarded for waste management uses, whilst the Slyfield Industrial Estate immediately to the south and west of the application site is a Strategic Employment Site (lite industry, industry and storage and distribution).
159. A tree preservation order (TPO) (TPO/P1/201/266) covers a belt of trees which runs north from North Moors Road and is outside of the application boundary. Other TPOs within the wider area include those within the residential area of Burpham and east of the A3 dual carriageway.
160. The Surrey Hills Area of Outstanding Natural Beauty (AONB) lies approximately 2.1km to the south of the application site and the Surrey Hills Area of Great Landscape Value (AGLV) lies to the south. Neither of these designations are within the application site boundary.
161. The designated Metropolitan Green Belt wraps around the north and east sections of the application site. The majority of the proposal lies outside of the designated Green Belt, however, the outfall and storm overflow pipes are within the Green Belt, both of these pipes are below ground.
162. A site of Nature Conservation interest associated with the meadows and wetland lies along the *River Wey* and its floodplain and the Riverside Park Local Nature Reserve (LNR) lies to the east of the application site. An area of ancient semi-natural woodland lies adjacent to the River Wey approximately 240m to the east of the Guildford Community Recycling Centre.
163. Sutton Place registered park and garden (Grade II\* Listed) is situated approximately 500m north of the closest point of the development (north of the outfall and storm overflow pipes). Sutton Place registered park and garden comprises part of the Sutton Park Conservation Area, which is also situated 500m north of the closest point of the development.
164. The *River Wey* and Godalming Navigations Conservation Area follows the *River Wey*, running approximately 250m east of the application site at the closest point and within approximately 5m of the proposed transfer tunnel shafts and worksite.
165. The application site is approximately 15.5 hectares and is not within any nationally or locally designated landscapes. The majority of the proposal is above ground and lies within the Slyfield River Valley Floor Landscape Character Area (RVLCA). The proposed

outfall and storm overflow pipes lie within the Lower Wey River Floodplain LCA, as defined by the Surrey Landscape Character Assessment 2015.

166. The landscape character areas relevant to the proposed development are RV5: Slyfield River Valley Floor and RF7: Lower Wey River Floodplain. The RV5 character area covers the rural-urban fringe either side of the floodplain of the *River Wey* around Slyfield. The RF7 landscape character area comprises the flat low-lying floodplain of the *River Wey* which is largely pastoral landscape dissected by the *River Wey* Navigation with its locks and towpath and multiple channels, streams and open water bodies.
167. The existing Slyfield Industrial Estate lies immediately to the south west of the site and forms part of the site's immediate context. The development is broadly a level area characterised by large modern industrial units set in a grid of access roads and extensive hard standing and vehicle parking areas. There is a range of miscellaneous infrastructure associated with the industrial estate including waste recycling plants, masts, light columns, storage tanks, silos and a variety of boundary treatments. The avenue trees and grass verges are well established with primary access routes and individual building frontages. The planting and other incidental tree and shrub planting within the area provide some screening and contribute to the landscape and visual amenity of the industrial estate.
168. LVIA focus on the most significant adverse effects of the proposed development and recognises key landscape features within or close to the application site that would be affected by the proposed development. The likely impacts arising are:-
- Construction
  - Operation (winter, year 1)
  - Operation (summer, year 15)

### **Visual Impact**

169. The application site will be located on the historic Slyfield landfill site which comprises of an area of disturbed ground previously subject to sand and gravel extraction and subsequent landfill. The area of land is gently sloping and slightly elevated above the *River Wey* floodplain, covered with an untidy mix of rough grassland, scrub and some areas of hardstanding. A dense woodland borders to the north and east of the site. The woodland belt is approximately 20 – 25m in width on a steep sloping embankment. Rural wetland meadows dissected by drainage ditches lie beyond the woodland belt alongside the meandering course of the *River Wey* and *River Wey* Navigation, which broadly runs from south west to the north west. The built development of Slyfield Industrial Estate lies immediate to the south and west of the application site beyond which are the residential areas of Bellfields and Stroughton.
170. In terms of immediate visual impact, views of the development site are effectively screened by dense woodland that wraps around the north and east parts of the application site. Other dense vegetation along the river provides screening. The views further south within the river corridor are more contained with the *River Wey* framed by mature riparian trees and scrub and punctuated in places by ancient/veteran pollarded willows. Other public rights of way in the local area such as footpath 66 which runs alongside the existing STW also offer glimpses of the application site.
171. Localised glimpses of the Slyfield Industrial Estate are visible through intervening vegetation from footpath 438 and 439 Worplesdon and Harry Pickup Memorial Meadow open space, known as Harry's Meadow, located next to Jacob Wells Village Hall. The views into the application site from the Guildford urban area is largely limited by extensive built environment and intervening vegetation.
172. The views into the application site from the residential area of Slyfield to the south west are screened by the substantial Industrial Estate buildings. The view from the residential area of Jacobs Well (north west) is restricted by woodland and tree belts along the field boundaries north of the industrial estate even during the winter months when the

deciduous vegetation is not in leaf. Extensive woodland along the *River Wey* and A3 corridor screen the application site from the view of properties along Bowers Lane (north east) and Abbotswood and Burpham (east). Views from Sutton Park registered park and garden to the north are screened by broad belts of woodland with the southern part of the park and north side of Clay Lane. These views have all been scoped out from the LVIA considerations.

173. Within the Slyfield Industrial Estate there are limited views of the application site, with the proposed development visible along Moorfield Road, framed by other industrial buildings and streetscape trees. The central and western parts of the application site are also visible from Westfield Road and North Moors.
174. The application site will also be largely screened from the Burpham allotments off Bowers Lane by dense vegetation. Stringer's common, publicly accessible common land, is also screened by extensive intervening built development and mature woodlands. These areas have been scoped out from the LVIA considerations.
175. The range of views towards the application site are limited. However, the LVIA has identified a number of visual receptors that may experience changes in their views or visual amenity as a result of the development. These include:-
- Users of the River Wey Navigation
  - Users of footpath 438 Worplesdon
  - Users of footpath 52b and 66 Guildford
  - Users of footpath along Clay Lane including 439a Worplesdon
  - Users of the *River Wey* within the *River Wey* and Godalming Conservation Area
  - Visitors to Riverside Park NLR
  - Visitors to Harry Pickup Memorial Meadow open space (crossed by footpaths 438 and 439 Worplesdon)
  - People using the upper parts of Bellfields Green public open space
  - Residents at Burpham Court Farm
  - People using upper parts of Bellfields Green public open space
  - Some residents at Bellfields Road, Mangles Road, Stoke Mill Close, Swan Court, Bellfield Green and Oak Tree Drive and Woking Road, including property at the entrance to the Guildford Borough Council Woking Road Depot
  - People working at or visiting Guildford Borough Council Woking Road Depot and Slyfield Industrial Estate
  - People travelling to Clay Lane
176. The LVIA has assessed the landscape and visual effects of the proposed development at three separate timeframes. These include Construction; Operational (winter, year 1) and Operational (summer, year 15). Separate assessments are made showing the likely effects with and without landscape mitigation for these three timeframes.
- The likely construction effects without mitigation are considered to be:-*
177. During the construction phase of the development there would be direct landscape impacts on the application site and the corresponding landscape/townscape character areas. Significant effects, major and moderate adverse, are predicated to impact the RF7, RV5, 11B LCA, the Slyfield Local Landscape Character Area and the Green Belt. This includes the direct effects on the landscape fabric from the construction of the new STW and the shafts/pipelines, including the change from undeveloped to developed land, and the removal of tree groups at the main worksite compound (north of the existing STW) and transfer tunnel shaft locations.
178. The tree removal at the main worksite compound shown on drawing number J009-AJ\_GUILS1ZZ-PLN\_DR-C-10510 P03 – construction worksite sheet 2 would be fairly extensive, resulting in the removal of 'Category B and C' trees and groups. This area of land falls within the Weyside Urban Village development and the trees identified for

removal, on plan the above plan, are permitted under the WUV development. As such the impacts of the tree removal have already been considered and assessed by Guildford Borough Council as part of the approved hybrid planning application (ref:20/P02155). Therefore, the removal of the trees would be necessitated by the Weyside Urban Village development.

179. Whilst these trees are likely to be removed as part of the Weyside Urban Village development, officers have held discussions with the applicant regarding tree retention within this location. The applicant has advised that there is potential to retain some of the 'Category B' trees, previously outlined for removal. These include T220, T223, G401 as shown on the Tree Removal Plan ref: J009-AJ-GUILS1ZZ-SGR-DR-Z-10367 Rev 2 dated 19 October 2021.
180. Other impacts on the site include the replacement of the largely open character of the site with temporary site offices and welfare facilities, stockpiles of materials, plant and machinery, parking areas and the new STW structures, buildings and other infrastructure.
181. The ES concludes that while construction landscape mitigation measures would slightly reduce potential adverse landscape and visual effects during the construction phases, the scale of the construction operations involved, it is unlikely that there would be a step change reduction in the landscape and visual effects. Therefore, the construction landscape and visual effects remain. The construction effects are temporary and short term and the applicant has sought to reduce the effects of the construction works as far as reasonably practicable.
182. Officers are in agreement with the predicated construction effects without mitigation which include the significant effects for a wide range of visual receptors including high sensitivity local residents and Public Right of Way users. It is accepted that many of the adverse effects relate to the visibility of temporary tall plant equipment such as cranes, which are likely to rise above the tree belts which surround the site.

*The likely operational effects without mitigation are considered to be:-*

183. No significant landscape operation effects are predicted at year 1 of 15. Minor to negligible adverse effects are predicted for all landscape receptors, this includes some localised tree removal; slight indirect effects on the setting/tranquillity of the surrounding landscape character areas, due to night lighting, and the potential for odours from the new STW.
184. A significant visual effect (moderate adverse) is predicted without mitigation at year 1 and 15. This relates to the visual impact from the residents at Burpham Court Farm, located approximately 375m to the north-east of the application site. Upper parts of several new STW structures, such as the sludge cake storage silos and vent stacks would be visible from this location. The view will be either above the canopy line of intervening vegetation or through a gap. Very localised glimpses of the new STW infrastructure will be visible during the winter months. The CLA does not agree with the LVIA and has commented that the visual effect on Burpham Court Farm would be at an upper level of moderate adverse during the winter months, as despite the separation distance, the new structures at the site would have a linear extent of c.400m and the taller elements would be quite prominent in the centre of the view, seen above the canopy line year round and through the tree belt in the winter months.
185. Other predicted visual effects are considered to be minor adverse to negligible adverse (not significant) across the range of visual receptors assessed. Within the Slyfield Industrial Estate, receptors would experience '*extensive and frequently open close views of the structures, buildings and miscellaneous infrastructure of the new STW seen in context within the existing industrial estate setting*'. The low receptor sensitivity combines with a medium adverse magnitude of visual impact and results in minor adverse effects. Across a

range of visual receptors, the upper parts of the taller structures of the STW (e.g. sludge cake storage silos/hoppers and slim odour control vent stacks) would be most visible as they would rise above the height of existing screening vegetation and the built development in and around the industrial estate. The 6m high slim vent stack would also be visible or partially visible at the transfer tunnel shaft locations, some of which would be in close proximity to the *River Wey Navigation*.

### *Proposed mitigation*

186. The proposed landscape mitigation measures during the construction phases include keeping the removal of vegetation to a minimum, with all retained vegetation to be protected with fencing around root protection areas, as in accordance with the British Standard BS5837: 2012. Any grassland meadow areas impacted by the construction of the outfall and store overflow pipes would be reinstated and temporary hoarding provided along the North Moors and Westfield Road construction site boundaries. All construction lighting would be kept to a minimum, including the use of downward facing shielded lighting.
187. The applicant is also proposing to submit a Construction Environmental Management Plan (CEMP) identifying all the mitigation measures required to manage and minimise the impact of the development and its surroundings, during the construction and operational phases. Officers agree that the visual impact during the construction and operational phases could be minimised through the submission of a CEMP and it is recommended that a planning condition be imposed.
188. The applicant has also agreed to change the colour of the sludge cake storage silos from green to a neutral recessive light grey (goosewing grey) to match the colour of other tall infrastructure within the STW site and the wider industrial estate. The colour change is an improvement and would allow for the taller on site structures to harmonise with the skyline and coincide with the other buildings on the industrial estate. A planning condition is recommended to ensure that the use of neutral recessive light grey (goosewing grey) finishes on the taller above ground structures and the vent stacks at the tunnel shaft locations are implemented.
189. Additional planting adjacent to the north-eastern elevation of the welfare building has been suggested by the applicant. The additional landscaping will include a proportion of larger evergreen Scot Pine specimens (3.5 – 4m in height at planting), which will provide some year-round screening of the large welfare building from the north as well as receptors at Burpham Court Farm. The proposed additional landscaping would improve the original planting proposal, resulting in an increase in visual screening, of the welfare building, during the winter months. A planning condition requiring the submission of hard and soft landscaping is proposed.
190. During the operational phase of the development the management and reinforcement of existing vegetation to the north of the new STW site would assist in integrating the development into the landscape. Extensive native infill planting is proposed within gaps in the belt of woodland wrapping around the northern part of the application site. This is to include some larger feathered / standard size specimens to provide immediate structural diversity and screening, with a proportion of evergreen native species to enhance winter screening.
191. The existing woodland belt and proposed infill planting would be subject to a regular management regime, to promote a dense layered canopy screen throughout the vertical profile of the vegetation. The use of biodegradable, non-plastic, spiral guards for tree and shrub planting is proposed. Native species rich in hedgerow and ornamental shrub planting would also be undertaken within the new STW site, with ongoing long term maintenance and management over a minimum of 30 year period. This would be in

accordance with an overarching Habitat and Landscape Management Plan, which is included within the ES at appendix 10.14 and is subject to a planning condition.

192. Officers consider the submitted Habitat and Landscape Management Plan to be acceptable and could contribute to visual screening and habitat enhancements within the northern woodland belt, around the application site.

#### *Residual Effects following mitigation*

193. The landscape and visual operational effects for winter, year 1, are considered to result in a reduction of lighting to the minimum necessary to allow for the safe and efficient operation of the new STW and use of the full cut off lanterns with LED light bulbs, mounted as low as possible, and the use of recessive finishes to the buildings/structures would slightly reduce potential adverse landscape and visual effects at winter, year 1. The management and reinforcement of existing vegetation would not however, have taken much effect or matured sufficiently to achieve any additional material mitigation. It is therefore unlikely that there would be a step change reduction in the landscape and visual effects. Officers agreed with this assessment.
194. The landscape and visual operational effects for summer, year 15, the LVIA predicts that no step change in significance of residual effects with mitigation compared to without mitigation. These effects remain predominantly at minor adverse (non significant), with the exception that predicted effects on the tree resource, part of the green infrastructure, reduced from minor adverse to negligible adverse, due to the management of existing vegetation and establishment of new infill planting.
195. For visual operational effects, summer year 15, the LVIA predicts that for residents at Burpham Court Farm the landscape mitigation to the northern tree belt around the site boundary would be well-established, through management of existing vegetation and infill planting. The increase in screening would reduce the level of effects from moderate adverse (significant) to minor adverse (non-significant). The CLA is largely in agreement with the predictions, although this is dependent on additional planting along the north eastern elevation of the welfare building and the painting of the sludge cake storage silos.
196. The LVIA comments that 'extensive planting proposed as part of the Weyside Urban Village (planning application reference 20/P/02155) and Burpham Court Farm open space COU application (planning application reference 20/P/02173) developments would also provide additional 'off-site' mitigation and further assist in integrating the development into the landscape'...'and assist in the screening of the development'. Officer consider that limited weight should be given to the additional landscape value and visual screening proposed, as part of the above applications. However, it is acknowledged that once implemented the additional planting within the floodplain to the north and east of the existing tree belt would have the potential to further screen the development, particularly from the north and east viewpoints.
197. A cumulative effects assessment has been undertaken and included in Chapter 14 of the ES. No significant residual interactive or cumulative effects have been identified for the development.
198. The County Landscape Architect (CLA) is in agreement with the assessment of sensitivity of landscape receptors.

#### *Conclusion of landscape character and visual impact*

199. The submitted LVIA is a robust assessment of the likely landscape and visual effects of the proposed development. It is accepted that the development would have an urbanising influence on the surrounding landscape, in particularly due to the presence of the new industrial STW infrastructure.

200. When compared to the existing industrial estate development, the substantial STW development will increase the contrast between the undeveloped floodplain and the riverside area and the edge of the built-up area of Guildford. This is due to the STW having a greater footprint and height and being located closer to the tree belt wrapping around the north and east of the industrial estate. Visibility would be greater during the winter months due to the lack of leave coverage and this would allow for some filtered views through the intervening tree belt.
201. The taller STW infrastructure would be visible all year round above the tree canopy line and over the short to medium term the landscape mitigation planting and management would increase the level of screening surrounding the STW site.
202. The significant adverse landscape and visual effects identified in the LVIA during the construction phases are considered to be short term and temporary in nature. Once the development is operational, residents of Burpham Court Farm would experience an adverse visual effect whilst the screening matures. The main long-term residual effects of the development include minor adverse effects on the landscape character through impacts on the setting and tranquillity of the neighbouring land, including the highly sensitive floodplain and *River Wey* / Wey Navigation; and minor adverse effects on local views (public and private) through visibility of the above-ground structures of the STW, particularly the structures which rise above the tree belt.
203. The CLA is in agreement with the predicted landscape and visual effects identified within the LVIA and subsequent appendices and has raised no objections to the proposal. The CLA has requested that planning conditions be imposed.
204. On balance, it is accepted that the landscape character of the application site will alter as a result of the proposed development. In the medium to short term whilst the landscaping and vegetation mature the effects are likely to be greater.
205. The applicant has proposed a number of mitigation measures which will help screen the new STW from the receptors identified. These measures include substantial planting, retention of existing trees and woodland management, allowing for biodiversity opportunities.
206. Officers recognise that the proposal would alter the landscape character in the immediate locality of the application site, however, these are inevitable consequences of constructing a new sewage treatment plant. The new STW will provide improved facilities for Guildford residents and will allow for the mixed use Weyside Urban Development project to be implemented.
207. Officers are satisfied that through mitigation measures and enhancements the proposed development is considered to accord with the NPPF, National Planning Policy for Waste, Policy 13 and 14 of the SWLP, Policies P2, D1, ID4 and A24 of the GLPSS and Saved Policies G1(12) and G11 of the GLP.

### Lighting

208. The application site is located to the north of an industrial estate with surrounding residential areas which would be classified as suburban. Policy 14 of the SWLP requires consideration of lighting as part of any waste development proposal. Policy G1(8) of the GLP states that external lighting should be designed to minimise glare and the spillage of light from an application site.
209. The proposal would include lighting for both the construction and operational phases. The applicant states that for the operational phase of the STW for health and safety reasons, lighting would include road lighting, car park lighting, skip loading area lighting, walkways and plant flood lighting.

210. The NPPG paragraph 001<sup>1</sup> states that “*artificial lighting needs to be considered when a development may increase levels of lighting or would be sensitive to prevailing levels of artificial lighting [...] It has the potential to become what is termed ‘light pollution’ or ‘obtrusive light’, and not all modern lighting is suitable in all locations. It can be a source of annoyance to people, harmful to wildlife and undermine enjoyment of the countryside or the night sky, especially in areas with intrinsically dark landscapes. Intrinsically dark landscapes are those entirely, or largely, uninterrupted by artificial light*”. The NPPG outlines<sup>2</sup> that light intrusion from developments occurs when there is light spill which can be overcome through good design, correct installation (avoiding lighting near or above the horizontal) and ongoing maintenance and using luminaire selection.
211. The Institute of Lighting Professionals (ILP) Guidance note<sup>3</sup> outlines that obtrusive light is a form of pollution. This can be sky glow (the brightening of the night sky), glare (brightness of a light source), light spill (beyond the boundary of the area being lit) and light intrusion (nuisance) are all forms obtrusive light. The guidance states that any lighting scheme consists of a light source, a luminaire and a method of installation/ mounting. The choice of luminaire with the right optical distribution at the right mounting height is critical to minimising light spill and obtrusive light effects, yet providing the right lighting performance on the task area. It is therefore important to consider the luminaire, its light distribution, how it is installed and how it is set up.
212. The Guidance goes on to state that in most cases it will be beneficial to use as high a mounting height as possible, giving due regard to the daytime appearance of the installation, as a lower mounting height can be worse and can create more glare and spill. In rural areas, such as this, the use of full horizontal cut off luminaires installed at 0° uplift will, in addition to reducing skyglow, also help to minimise visual intrusion within the open landscape. The Guidance provides Environmental Zones for exterior lighting control of which this site would fall within E3 Suburban medium district brightness which correlates with CPRE’s Light Pollution and Dark Skies map<sup>4</sup>. On this basis, the Guidance outlines that
- a. for vertical illuminance and light spill within E3 to be 10lux for pre-curfew and 2lux for post curfew;
  - b. for skyglow within E3 to have a upward light ratio of 5
213. The applicant has not said how many luminaires would be installed as part of this proposal nor where they would be located and how they would be positioned. The applicant has stated that lighting would be automatic control via passive infra-red and/ or photocells, use of LED lighting where possible, ability to control lighting remotely from the site control centre, use of a local isolator and luminaire upward light ratio of 0%. However Officers recognise that for health and safety reasons, some lighting would have to be used during the hours of darkness.
214. With regards to the construction phase and the construction compounds that would be in place, the applicant states that construction activities would mainly take place during daylight hours minimising the need for lighting but equally recognising that where works are required to take place during the winter months lighting could be required. However the construction of the transfer tunnel would require continuous working below ground to reduce potential settlement and mitigate construction working risks and consequently construction work at the transfer tunnel shaft temporary construction compounds would be needed to be 24 hours a day 6 days a week for this particular operation. Lighting during this phase would have to be provided for a safe working environment.

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<sup>1</sup> Paragraph: 001 Reference ID: 31-001-20191101

<sup>2</sup> Paragraph: 003 Reference ID: 31-003-20191101

<sup>3</sup> ILP Guidance notes for the reduction of obtrusive light, 2021

<sup>4</sup> [England’s Light Pollution and Dark Skies \(cpre.org.uk\)](http://England's Light Pollution and Dark Skies (cpre.org.uk))

215. The applicant recognises the need to ensure lighting from the construction compounds, especially E8 which is located in close proximity to properties on Stoke Mill Close. This is alongside the construction compound that is located in proximity to Waterside Road. The applicant states that as, at this stage, the final details of the lighting is unknown that a condition be imposed that requires the submission of a lighting scheme be provided and approved before commissioning of the STW commences.
216. The County Lighting Consultant (CLC) has reviewed the submission and notes the applicants request that detail of the lighting scheme be subject to a condition. The CLC notes that detail has not been provided with regard to this matter. The CLC raises no objection to the proposal but states that the lighting scheme should be submitted for approval prior to the installation of any lighting at the site and notes the applicant's request for the condition prior to commissioning.
217. Officers consider it is necessary and reasonable to impose a condition that requires the submission of a lighting scheme for the proposed operational lighting prior to the installation of any lighting that is due to be installed; and that a verification report should then be provided to demonstrate the lighting as installed meets the detail. Officers recognise that whilst the application site lies in a suburban area, the area for the relocated STW is currently an unoccupied area where there is no lighting. This proposal would introduce new lighting into what is a darker area and as such, it is necessary to ensure that this aspect of the proposal does not create sky glow, glare or spillage.
218. With regards to construction lighting, Officers consider that lighting can be included within the CEMP which would cover all components of the construction phase to ensure that it does not harm the environment or amenity. Officers consider that the imposition of suitability worded conditions would ensure that the proposal would not have a significant adverse impact with regard to lighting.

### **Ecology, Trees and Biodiversity**

219. Paragraph 174(a) and (b) of the NPPF seek to protect and enhance sites of biodiversity value recognising the wider benefits from trees and woodland. Paragraph 174(d) requires decisions to minimise impacts on and provide net gains for biodiversity including coherent ecological networks that are more resilient to current and future pressures. Section 40 of The Natural Environment and Rural Communities Act 2006 states that "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity".
220. Policy 14(vi) of the SWLP states that planning permission for waste development will be granted where it can be demonstrated that it would not result in unacceptable impacts on the communities and natural environment, including biodiversity and geological conservation interest, including site of local importance (LNR, SNCI) for biodiversity or geodiversity, irreplaceable habitats and protected species.

### *Habitats*

221. Chapter 10 of the ES relates to biodiversity, ecology and nature conservation and sets out the results of an Ecological Impact Assessment (EclA) of the development within Appendices 10.1 – 10.16.
222. The application is accompanied by a baseline species and habitats survey, habitat regulation assessment (HRA), legislative compliance report and screening report. These documents are set out within Chapter 10 of the ES which considers the impact of the development on biodiversity. This includes ecological designations such as SPA, SSSI, LNR and SCNI.
223. There are several ecological designations within close proximity to the application site, namely:

*Designated sites:*

- two European sites for nature conservation within 10km of the site
- six SSSI sites within 5km of the site
- two LNRs sites within 2km

*Non-designated sites:*

- nine SNCIs and one conservation verge within 2km of the site

224. Habitats at the application site were found to be suitable for priority species and survey reports in support of the application included amphibian, bats, otter and water vole, breeding birds, terrestrial invertebrate, aquatic macrophyte and aquatic macroinvertebrate.
225. It is important to assess whether the impact of change on the above species would be high (permanent change likely to change the ecological integrity), medium (moderate scale of permanent change, integrity of feature not affected) or low (small magnitude, integrity not affected). Saved policy G11 of the GLP states that development within the corridor will be permitted provided that it protects or improves the special character of the *River Wey*, in particular its ecological value and provided that the nature conservation value of the site is protected or improved. Saved policy NE4 of the GLP states that planning permission will not be granted for any development that would be liable to cause any demonstrable harm to a species or its habitat protected by British Law unless conditions are attached requiring steps to secure their protection.
226. This proposal is considered to result in both short and long term changes in habitats, with the short term changes including the removal of scrub, trees and hedgerows. These would incur direct losses from clearance of vegetation and activities such as noise and lighting disturbances.
227. The species identified within the EcIA include the following:
228. Great Crested Newts (GCN). Eleven ponds and two ditches within 500m of application site were assessed. No records of GCN were found to be within the study area. Although two were found to be within 2km. Given the findings of the survey, GCN are considered to be absent from the development and would therefore have negligible ecological importance. This receptor is not considered further in this assessment. However, should GCN be found during the construction works, all work on site shall cease immediately and an ecologist will be contacted for advice.
229. Bats. Records were collected within 2km of the application site and number of species were identified. 18 trees were recorded as having high and moderate bat roosting potential within 30m of the application site. No bats were recorded as emerging from trees previously surveyed in 2018. Non-breeding roost of soprano pipistrelle were located in trees greater than 30m from the planning application boundary to the north of the existing STW. Three buildings within the existing STW were identified as having moderate potential for roosting bats and four were identified as having low potential. Emergence/re-entry surveys undertaken on these buildings in 2018 and 2021 found a day roost by a single common and soprano pipistrelle.
230. Transect and static detector activity surveys undertaken in 2018 identified at least seven bat species present across the whole of the development. Activity levels within the majority of the development were found to be low, however, high levels were found at the north-east of the existing STW.

231. Otters (Riparian mammals). One record of an otter was found within 2km of the development site and two records of water vole were found 1,9km north-west of the development. Surveys were undertaken for otter and water vole between March – August 2018, March 2019 and May 2020. Three locations were also monitored using motion-sensitive cameras. One location in 2018 for 20 days and two locations in 2020 for 14 days. Otters were confirmed present on the River Wey through a camera trapping exercise on the northern section of the river closest to the landfill in 2018. It was considered that as a result of the lack of regular footage, the presence of an otter holt in the area was considered unlikely and the otters were commuting and foraging along the River Wey only. There was no evidence of water vole observed during the surveys. As no water voles or signs of water voles were found during the surveys they have not been considered further in this assessment.
232. Birds. 38 species were recorded breeding or potentially breeding across the development including a Schedule 1 Cetti warbler. A black redstart which is also a Schedule 1 species was recorded as potentially breeding in 2019. The species recorded were typical of the habitats present. Other species of conservation importance recorded included song thrush, spotted flycatcher, grey wagtail, house sparrow and nightingale. The survey undertaken in 2020 specifically recorded Cetti warbler, barn owl and hobby within the outfall area. Barn owls were recorded flying within the June and July survey. No sustained foraging was recorded within the vicinity of the proposed outfall pipeline.
233. Badgers. Badger surveys were carried out in 2018, 2019 and 2020 for field signs. Nine badger setts were recorded within 50m of the development site and in 2020 four were classed as disused and six were active, including one main sett. Signs of badger activity around the development include badger runs, evidence of foraging and latrines. An updated survey was undertaken in March 2021 and identified three new setts comprising a subsidiary and an annexe sett, within 50m of shaft E4a. To facilitate the construction of the new STW, closure or exclusion of each of these may be required. This is likely to comprise the closure of one sett and temporary exclusion of 6 setts. All sett closures specifically required for the development will be instructed by Thames Water. Sett closures, licences and mitigation will be managed by the WUV development.
234. Reptiles. Very small populations of slow worm, grass snake and common lizard were found within the northern landfill area. A good population of slow worm and a single juvenile grass snake were recorded using the sludge lagoon area. A good population of slow worm was recorded using the sewage treatment works and allotment area. The habitat within the development such as scrub edges and grassland banks provide suitable habitats for reptiles to bask and forage in. Furthermore, woodland areas provide shelter during hibernation months.
235. Terrestrial invertebrates. A total of 508 species were recorded during the 2020 survey on and around the development site which had been identified as potential Open Mosaic Habitat. A single nationally rare species of spider was recorded and seven nationally scarce species were recorded.
236. Fish. The Environment Agency have undertaken routine monitoring of riverine sites on the *River Wey* and its major tributaries as part of the National Fisheries Monitoring Programme and Water Framework Directive (WFD) monitoring. Fisheries data from 10km of Guildford have been used to characterise the fisheries population in the vicinity of the development. The *River Wey* is categorised as moderate (ecological potential under the WFD) with records of chub, dace, bream, roach, tench and migratory species such as European eel, brown trout and brook lamprey.
237. As detailed above, the proposal includes final effluent and storm water outfall pipelines which discharge into the *River Wey* to the north east of the new STW. The pipeline would be positioned on the southern bank of the *River Wey* and would have two below ground

pipelines from the new STW. An outfall from the existing STW currently exists and discharges into the *River Wey* but further down stream from this proposed new location.

238. The applicant did assess the possibility of continuing to use the existing outfall however given its location and distance from the new STW and that to reach it would require tunnelling the outfall pipes through the historic landfill, the location of the proposed new outfall was considered the best environmental option. However, it is necessary to assess whether there would be an impact on the discharge from the outfall on the *River Wey's* ecology.
239. The submitted Biodiversity Net Gain Assessment submitted as part of the application states that 'No river habitat will be lost as a result of the development. On this basis a river metrics assessment has not been undertaken.' The Environment Agency have assessed the information submitted and raised an objection in relation to a loss of river habitat resulting from the new outfall discharging into the *River Wey*.
240. The EA objection states that "*We disagree that there will be no loss of river habitat resulting from the new outfalls. Specifically there will be 3 impacts: new outfall will be installed onto the bank; Riparian habitat will be lost because of the new outfall; the floodplain will be impacted during construction because of excavation for the new pipelines*" The EA requested that the applicant carry out and submit a river metric or provide a robust justification for why the river metric was not completed.
241. In response to the EA's objection the applicant has submitted an additional assessment of impacts on fish, dated 20 July 2022 and concludes that the embedded mitigation is included in the design of the outfall structure to prevent impacts upon the river environment and impacts upon fish species. '*Our further review and assessment of impacts upon the fish have been considered in respect of the WFD and it is concluded that there is no risk of deterioration in the WFD waterbody. The ES has also considered the impacts upon fish and residual effects concluded as not significant. These findings, and the ES are therefore robust in its conclusion*'.
242. The EA has reviewed the additional documentation submitted by the applicant and has confirmed that the objection can be removed. The EA has worked with the applicant to resolve the outstanding issues and considers the submitted information to be sufficient. The EA has confirmed that any outstanding concerns relating to the impacts on fish can be dealt with under the Environmental Permit regime for the operation of the outfall.
243. Officers are satisfied that the concerns raised by the EA have been adequately addressed.
244. Officers recognise that the proposal would involve harm and distribution of habitats for these protected species. Natural England's standing advice for protected species and development seeks avoidance, mitigation or compensation measure to be secured as part of a planning condition. The applicant has sought to avoid harming or disturbing protected species during the site clearance and construction phases of the development.
245. Trees, scrub and hedgerows will be retained and protected where possible in accordance with the BS5837:2012, adjustments will be made to the development design to minimise loss where possible; construction work will adhere to strict environmental good practice; protective fencing will be erected around root protection areas of trees to prevent damage to features and habitats. Appropriate exclusion zones will be maintained around valuable and important habitats to avoid accidental damage and materials and/or plant will not be stored in these areas. Night working will for the majority of tasks be avoided except during the construction of the transfer tunnel.
246. The County ecologist (CE) has reviewed the submitted ecological information and EclA and considers there is sufficient ecological information to assess the impacts.

247. Whilst the habitats of the receptors identified could be affected, officers consider there are other adequate habitats surrounding the application site which could provide alternative habitats. Officers are satisfied that the applicant has provided a robust assessment of the protected species at the site and that the proposal meets with the requirements of Natural England's standing advice as well as Saved Policies G11, NE4 of the GLP, Policy 14 (vi) of the SWLP and chapter 15 of the NPPF.

### Trees

248. An aboricultural impact assessment (AIA) has been submitted in support of the application and forms part of Appendix 9.5 of the ES.
249. The AIA has identified and evaluated the direct and indirect impacts on existing trees as a result of the implementation of the new STW. A total of 430 aboricultural items were recorded within the study area, these include:-
- 337 individual trees
  - 91 groups of trees
  - 2 hedges
250. There are no protected trees within the application site boundary, however, a tree preservation order (TPO) ref: TPO 1991 no.4, covers a group of trees situated immediately north of North Moors Road. These trees will not be affected by the proposed works.
251. The AIA has identified that tree removal will be necessary in order to implement the proposal. The trees to be removed are as follows:
- Impacts for new STW – removal of 3 trees
  - Impacts for transfer tunnel and/or associated works – removal of 28 trees and partial removal of 5 groups of trees. The associated works include the construction workers' car parking area.
252. The majority of trees that have been identified for removal across the development are either within the shaft locations or within the footprint of the associated working areas. 50 features are identified as being impacted by the development, 33 of these are to be partially or totally removed with 17 being impacted through encroachment. The AIA has stated that 75% of the features identified for removal or partial removal are categorised as low value grade 'C' trees or groups.
253. The tree and verification survey has identified a potential veteran / ancient tree, referenced as T13 on drawing J009-AJ-GUILSIZZ-SGR-DR-Z-10367 Rev P02 Tree Removal Plan, which is located north of the new STW and outside of the application redline boundary. To ensure that the tree is adequately protected during the construction works an extended root protection area will be applied in accordance with the Forestry Commission and Natural England standing advice on veteran trees.
254. The AIA has stated that retained and encroached trees will be protected prior to and during, on site, construction works. Suitable tree protection measures, including working methods for the installation/construction of the outfall pipelines, will be put in place to ensure that the trees are protected throughout the construction works.
255. Appendix B (preliminary generic aboricultural method statement) of the AIA states that trees which are to be retained will be adequately protected by fencing and compliant with BS 5837:2012 (BSI 2012). This would provide adequate root protection areas (RPA) and construction exclusion zones during the construction works.

256. The document further states that any soft ground within a root protection area shall be suitably protected in accordance with BS5837:2012 (BSI, 2012). All excavation works within the root protection areas must proceed with caution with hand tools only and the tree roots should be protected for the duration of the construction works. Tree Stems and buttress roots should be protected when works are located within 1.5m of the main stem. The stem will be protected by robust solid boards forming a rigid structure and will remain in place for the duration of the works. A planning condition is recommended to ensure that the construction works are carried out in accordance with the submitted arboricultural method statement.
257. The delivery, storage, mixing and discharge of concrete and other cement-based materials shall be carried out so that no run-off and spillage occurs near to the root protection areas of the retained trees. No materials shall be stored or prepared or used near to the root protection area. The tree protection measures shall be secured by a planning condition, prior to the commencement of works.
258. An area of land north of the existing STW and shown on drawing number J009-AJ-GUILS1ZZ-PLN-DR-C-10510 P03 – Construction Worksite Sheet 2 is proposed to be used temporarily as an area for construction workers' parking. The land is partly covered by hardstanding, scrub and individual/group trees and is currently used for operational purposes at the existing STW site.
259. This land also forms part of the WUV development which has planning permission for a mixed use development. The WUV development is due to be constructed once the existing STW have been relocated and the trees within this area are due to be removed as part of the proposal.
260. It is acknowledged that the parking provisions will result in a loss of trees within this area and as such officers have engaged in discussions with the applicant in order to retain as many trees as possible. The applicant has agreed that where possible trees will be retained and roots protected during the construction phase. Details of the tree retention and root protection zones, within the temporary construction workers parking area, will be subject to a planning condition.
261. The County Arboricultural Officer (COA) has reviewed the submitted documentation and considers the impact of the tree removal within the development site to be moderate to significant. However, he acknowledges that the tree removal is unavoidable and required in order to facilitate the development. The officer has advised that the construction works must be carried out in accordance with the Arboricultural method statement and where quoted the development should conform to BS5837: 2012.

#### *Biodiversity Net Gain*

262. Policy 14 of the SWLP requires waste development to be consistent with relevant national planning policy with respect to sites of international and European importance, or of national importance for biodiversity where those are located within the county or could be affected by development located within the county.
263. Policy ID4 of the GLP seeks to maintain, conserve and enhance biodiversity. The policy includes setting out that new development should aim to deliver biodiversity net gain where appropriate.
264. Saved policy G1(12) of the GLP requires that development is designed to safeguard and enhance the landscape and existing natural features on the site including hedgerows, trees and watercourses and ponds which are worthy of protection.
265. Saved policy G11 states that development within the corridor will be permitted provided that it protects or improves the special character of the *River Wey*, in particular its ecological value and provided that the nature conservation value of the site is protected or improved.

Saved policy NE4 further states that planning permission will not be granted for any development that would be liable to cause any demonstrable harm to a species or its habitat protected under British Law unless conditions are attached requiring steps to secure their protection.

266. Chapter 10 of the ES considers the impact the development will have on biodiversity. This is supported by a baseline species and habitat survey, compliance report (ES appendix 10.1), and a Habitat and Landscape Management Plan (ES appendix 10.14). A habitat regulation assessment screening report is also included as part of the planning application.
267. The application is accompanied by a biodiversity net gain assessment report (BNG). In accordance with the Defra metric to show that the proposal provides BNG in accordance with paragraph 180(d) of the NPPF. Whilst paragraph 180(d) seeks biodiversity net gains, the requirements for at least 10% BNG does not become a requirement for planning applications until November 2023. Therefore, there is currently no obligation for 10% BNG to be provided, however, applicants should start planning for these requirements. The BNG process looks at the biodiversity distinctiveness of each habitat which is then assigned a value followed by assessing the condition of the habitat from good to poor.
268. The BNG report outlines the different habitat types across the application site and the baseline situation for each habitat. The report states that there is a total of 6.18 ha of permanent habitat within the application site, supporting 23.95 habitat units. The BNG report states that all 6.18ha of habitat within the assessment area will be lost as a result of the proposal. To achieve 10% BNG a further 2.4 habitat units, 26.35 units in total must be provided over and above the existing onsite biodiversity value.
269. As a result of the development and once on-site biodiversity mitigation is accounted for, there remains a negative net change (a loss) in habitat units of 15.15 units. In combination, this means that to reverse the total net change in biodiversity value 15.5 habitat units must be provided to return to the baseline level (23.95 units) and a further 2.4 units must be provided to achieve a gain of 10%, equating to a total habitat requirement of 17.55 units for the development.
270. The BNG report has identified that the development will lead to a position of net loss of 15.15 habitat units. It will therefore be necessary for the entire outstanding 17.55 habitat unit requirements to be provided at an off-site location. The creation of on-site and off-site provisions will ensure that the development will provide net gains.
271. The BNG report states that these habitats will be created as follows:-

*New STW (on-site)*

- modified grassland is proposed within available areas resulting in a gain of 4.13 habitat units;
- 0.04ha of ornamental shrubs is proposed within the available areas resulting in 0.06 habitat units
- Modified grassland comprising 0.04ha to the north of the woodland (within the planning application boundary) will be converted to mixed scrub habitat (0.37 habitat units)

*Outfall structure (on-site)*

- 0.07ha loss of permanent habitat (0.64 habitat units)
- Construction of the new outfall at the River Wey will result in a loss of 0.01ha of habitat. However, the area around the new outfall (0.06ha) will be regraded and reinstated with *Holcus-Juncus* natural grassland (0.05ha) and Aquatic marginal vegetation (0.01ha) resulting in 0.4 habitat units.
- areas temporarily affected by the construction works will be fully reinstated.

*Offsite habitats (Burpham Court Farm) – area between the fence line and planning application boundary (including existing woodland belt)*

- the total area of habitats retained and/or enhanced outside of the new STW fence line is 1.83ha equating to 12.12 habitat units;
  - 0.52ha of habitat will be retained resulting in 3.65 habitat units;
  - Modified grassland comprising 0.04ha to the north of the woodland but within the planning application boundary will be converted to mixed scrub habitats resulting in 0.37 habitat units.
  - 1.27ha of woodland will be enhanced increasing resulting in an improvement from 8.78 habitat units to 12.30 units.
272. To secure the off-site BNG a Section 106 Agreement has been entered into between the applicant (Thames Water), Guildford Borough Council (GBC) and SCC. This will secure the delivery of the off-site habitat creation and enhancements.
273. The area temporarily affected by the construction of the outfall pipelines will be fully reinstated as part of the development and further enhancements will be implemented by Guildford Borough Council (GBC) in accordance with the Section 106 Agreement.
274. The off-site provisions will be achieved by GBC as part of the biodiversity enhancements for the publicly accessible open space and nature reserve development (subject to a separate planning applicant for a change of use of the land) to the north of the application site, at Burpham Court Farm.
275. The BNG contributions include the creation of 1.88 hedgerow units on site and the provision of 17.55 habitat units off-site. These cumulative habitat units will ensure that the development provides net gains for biodiversity.
276. A habitat and landscape management plan (Appendix 10.14 of the ES) sets out the actions and responsibilities required for the creation, reinstatement and enhancement of the habitats. A habitats management and monitoring scheme is also included to ensure that the habitat targets are achieved.
277. The County Ecologist and County Landscape Architect (CLA) have reviewed the BGN. It is noted that the CLA has requested that species-rich grassland and shrub be planted within the main STW site. The applicant has advised that almost all of the land, within the STW site, is reserved for future expansion of the treatment capacity or is situated around operational plant for which access is required at all times. It is therefore not deemed appropriate to create high value habitats in these locations. The CLA has accepted the applicant's reasoning for not providing the additional on site biodiversity and acknowledges that the proposal will enable an additional 10% BNG.
278. Officers are satisfied that biodiversity net gain will be achieved through the proposed on-site and off-site habitat provisions, subject to planning conditions and a Section 106 Agreement.

### **Stability**

279. Ground stability has the potential to impact the development due to the historic landfill and its embankment and the outfall alongside the construction of the transfer tunnel. Policy 14 criteria (viii) of the SWLP is clear that planning proposals should address land stability issues and the impact of that on the land.
280. Paragraph 183 of the NPPF states planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation and

adequate site investigation information, prepared by a competent person, is available to inform these assessments.

281. The Environmental Statement has reviewed stability for the transfer tunnel and outfall alongside the historic landfill using a worst case slope gradient and surcharge loading. The geology along the transfer tunnel comprises made ground, alluvium and London Clay. Alluvium and London Clay lay beneath the historic landfill.
282. Unlike a STW constructed in virgin ground, no plant or equipment would be placed beneath or at a lower level because of the historic landfill. Instead, to avoid the need for excavation of the historic landfill waste the new STW is to be constructed on the landfill site by piling through the landfill until the piles meet the London Clay beneath it. Structures and plant would then be constructed entirely above ground supported on piled foundations. This is to minimise the quantity of material that will need to be excavated from the landfill, due to the environmental and human risks that approach would present. For minor structures such as access roads, hardstanding areas and pipelines that are not as heavy, a method known as controlled modulus columns (CMC) or a similar technical would be used to form a platform for these elements to be constructed on. CMC consists of concrete columns combined with a granular bed to spread loads between the ground and the CMC to form a platform. The applicant proposes that all the final design and construction method and risk assessment would be finalised before construction works start with a suitably worded condition imposed requiring this.
283. Ground improvement works are required to the historic landfill area to limit differential settlement caused by the landfill material state of compaction and slow rate of ongoing degradation during the operation of the STW. The applicant proposes to import granular material to form a sacrificial working platform which would also provide a barrier to the historic landfill. The applicant proposes to use a technique known as rapid impact compaction (RIC) using a hydraulic hammer that is repeatedly dropped on a large steel footing placed on the ground surface following a sequential grid pattern across the site to compact the soils and the historic landfill. This is intended to compact the waste within the landfill. RIC is used as it increases bearing capacity, decreases settlement and mitigates the risk of liquefaction. Monitoring of the ground would take place. Once these works are complete, a second granular capping layout would be provided across the site to form the working platform for piling and subsequent construction including using steel frame portal structures, concrete cast tanks, precast concrete elements and prefabricated tanks.
284. As the outfall pipelines are to be placed within the landfill perimeter embankment, it is proposed to support these sections of outfall pipeline on piled foundations to eliminate any risk of damage to the pipelines due to settlement. The outfall pipelines between the landfill embankment and discharge point would be buried and are not expected to have stability issues. The outfall structure has been designed to channel flow away from the banks to avoid any erosion or instability issues.
285. The County Geological Consultant (CGC) has reviewed the information submitted in the Environmental Statement on stability issues for the landfill and outfall pipeline. Officers and the CGC recognise that the use of RIC has the potential to 'squeeze out' leachate that is present in the landfill and locally raise the leachate level and/ or increase pore water pressures near the perimeter where the outfall is to be placed. The CGC comments that the waste within the landfill will continue to settle and degrade however there would be an additional load on the surface from the site capping, levelling, roads and hardstanding that give rise to settlement risk even if the main structure buildings and plant loads are carried on piles. Officers note that the applicant's method of reducing this settlement risk is through RIC.
286. The applicant is proposing RIC trials would be used across the site which would be closely monitored to assess the effects on groundwater and leachate quality and levels, vibration and other potentially significant effects. These trials would feed into a Remediation Strategy Report and also a monitoring programme to monitor the impact of the RIC and

would set trigger levels for action plans. The CGC recognises that the effects of this will not be fully established until trials are complete but comments that the structure is not likely to give rise to significant environmental effects in respect of land instability. The CGC has reviewed the submitted documentation and assessment work forming part of this application and comments that the assessment of effects and impacts in respect of waste settlement and its treatment are appropriate subject to the imposition of conditions. The CGC recommends that a pre-commencement condition be imposed requiring a detailed Remediation Strategy Report be submitted for approval to the CPA together with a condition for the monitoring of the impact of the RIC and trigger levels.

287. With regards to the piling technique, the CGC has reviewed the piling through the landfill risk assessment and notes the applicant intends to use only displacement piling techniques because they have the lowest risk of contaminant pathway creation and considers the risk assessment appropriate. The CGC recommends that a pre-commencement condition is imposed that provides the final detail of the piling to take place.
288. The CGC had raised queries with regards to the land stability of the landfill perimeter embankment bund slopes. To address this the applicant provided a 'Landfill Stability Addendum' which, in the absence of boreholes and testing within perimeter embankment a very conservative ground model was adopted with suitably cautious characteristic values of geotechnical parameters and groundwater level. The perimeter slopes were inspected for indicators of instability and none were noted with the results of the studies carried out demonstrating that the risk of landfill embankment failure in the construction and operation being very low. The CGC concurs with this assessment. The CGC is satisfied that the ES includes an assessment of effects and impacts in relation to ground stability and settlement using an assessment methodology and significance criteria that is appropriate and robust.
289. A conceptual model and risk assessment report is provided within the Environmental Statement that assesses settlement along the transfer tunnel route. This found that there are a number of utilities along the centre line of the tunnel and shaft connections. The Phase 1 assessment shows that significant settlement effects from tunnel and shaft construction are unlikely and that there should be monitoring of settlement and/ or ground movements during and after construction alongside the monitoring of impacts of construction on adjacent existing structures. The CGC concurs with this and recommends that a pre-commencement condition is imposed to the effect that for the tunnel and shaft construction a settlement monitoring plan is prepared and submitted for approval which includes the recommendations from the risk assessment.
290. Officers are aware that the proposal involves approaches and method that would allow the construction of the new STW above the historic landfill. The applicant has chosen methods to minimise impact including piling and use of RIC to prepare the ground. Officers are aware that the proposal would involve the construction of an outfall and transfer tunnel and that the ES provides a risk assessment on these elements. Officers are satisfied, on the advice of the CGC, that pre commencement conditions can be imposed for the proposed development, that further detail on the piling through the landfill, the transfer tunnel alongside the groundwater risk assessment and the remediation strategy that the construction of the new STW and transfer tunnel would not give rise to significant adverse impact with regards to stability and therefore would be in accordance with the development plan.

## **Contamination**

291. A ground investigation has identified land contamination within the planning application boundary. The development has the potential to disturb areas of existing ground and groundwater contamination including leachate and existing contaminated groundwater, and potential impacts of encountering contamination on the environment and human health during the construction and operational phases and that without appropriate mitigation measures being implemented, a number of potential source – pathway – receptor linkages could result from activities associated with construction and operation of the development.

officers are aware that concerns have been raised with regards to potential impact on the Riverside Park LNR which is designated for areas of flood meadow and wetland habitats, as such, the presence of potential groundwater dependent terrestrial ecosystems (GWDTE) cannot be discounted.

292. Policy 14 criteria (viii) of the SWLP is clear that planning proposals should address existing and potential contamination and the impact of that on the land. Policy G1(11) of the saved Guildford Local Plan 2003 states that where a proposed development is on or close to contaminated land, the applicant should demonstrate that the site is safe or can be made so through remedial measures. The policy supporting text recognises that it is important that developments affecting contaminated land do not give rise to unacceptable risks to the environment or health.
293. Paragraph 183 of the NPPF states planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from contamination. Paragraph 184 goes on to say that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.
294. Paragraph 185 states that planning decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site of the wider area to impacts that could arise from the development. paragraph 188 states that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes).
295. Paragraph 001<sup>5</sup> of the NPPG states that the planning system has an important role in considering land stability by minimising the risk and effects of it on property, infrastructure and the public and to bring unstable land, wherever possible, back into productive use.
296. As detailed above, the proposed relocated STW is to be located on part of the historic Slyfield landfill and because of this, most structures and plant are to be constructed entirely above ground, supported on piled foundations, to avoid the need to excavate the historic landfill. The landfill is dilute and disperse which means it is not lined or capped and leachate and landfill gas disperse from the site. The leachate is in hydraulic continuity with groundwater with the London Clay beneath it providing an impermeable layer. The applicant has undertaken a remediation options appraisal of the proposal to determine which remedial measures would be necessary at the site and has provided an Outline Remediation Strategy.
297. The landfill currently generates leachate due to the material within it and as outlined above, this leachate is in hydraulic continuity with the groundwater. The groundwater at the landfill also includes heavy metals, ammoniacal nitrogen, chloride and phenol. Both groundwater and landfill leachate are expected to be encountered during the construction phase. The Environmental Statement has outlined the following potential impacts from the proposal with regards to contamination during the construction phase:
- i. Construction workers exposed to contamination in soils
  - ii. Construction workers exposed to ground gases due to gas migration
  - iii. Adjacent users exposed to airborne releases from soils
  - iv. Groundwater from shaft construction introducing new pathway
  - v. Sensitive receptors should contaminative material be imported
  - vi. Sensitive receptors from migration of ground gas vapours
  - vii. Adjacent users exposed to ground gases due to gas migration
  - viii. Human health from nuisance effects like noise/ odour

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<sup>5</sup> Paragraph: 001 Reference ID: 45-001-20190722

- ix. Groundwater from mobilisation of contamination during groundworks leading to deterioration of groundwater quality
  - x. Sensitive receptors such as the LNR from mobilised contamination during groundworks leading to a deterioration of groundwater/ surface water quality
  - xi. Groundwater from piling introducing new pathway
  - xii. Groundwater from new boreholes introducing new pathway
  - xiii. Controlled waters from groundwater
  - xiv. Groundwater supported surface water body from mobilisation of contaminated groundwater
  - xv. Sensitive receptors from accidental spills and leaks
  - xvi. Sensitive receptors from concrete and cement products
  - xvii. Groundwater levels
298. Of the above list, items (i) to (vi) have been assessed as having a predicted effect without essential mitigation as not significant. Items (vii) to (xvii) were predicted as having a slight or moderate significant effect when with embedded mitigation. Therefore, further mitigation is required. To address this, a Remediation Strategy was submitted within the Environmental Statement which details how the development can be constructed maintaining the status quo and without the introduction of new pathways and pollutant linkages.
299. Embedded mitigation includes using caisson sink when constructing the tunnel shafts until they reach the London Clay and using gas resistant seals to prevent the ingress of leachate and gas thereby preventing a pathway, use of driving piling to create platforms rather than removing historic waste with compaction trials, using RIC and using a network of boreholes. Because of the use of RIC and a driven displacement piling technique, migration of gas and groundwater is expected to be minimal. Compaction would be undertaken in phased areas and impacts are expected to be localised.
300. The applicant recognises it is necessary to ensure the proposal causes the minimal change to the current equilibrium of this leachate. The applicant states that the RIC process allows for dissipation of pore pressures and the re-establishment of equilibrium to occur, and that using piling would have a localised and short-term effects on the leachate levels and groundwater movement. To ensure no adverse effect are occurring during the construction groundworks, a perimeter network of leachate monitoring and extraction wells are proposed to be installed along the northern and eastern boundaries of the STW site. These boundaries are chosen as groundwater flow is broadly in a north and north easterly direction. Monitoring wells would be installed along the southern boundary but would be fewer in nature for the above reason. Monitoring of the wells would take place and if adverse effects were to occur, compaction or piling plant would be reassigned to an alternative area with leachate extraction as a backup mitigation where the leachate would be pumped out and taken to an appropriately licenced site. The applicant proposes a Borehole Management Plan for monitoring purposes which could include the need to sink further boreholes and evaluation.
301. Other essential mitigation includes a further piling risk assessment once the piling methodology is confirmed, a remediation verification report on completion of the remediation works, groundwater monitoring during the construction phase to monitor changes in quality and use of a Construction Environmental Management Plan (CEMP). The applicant proposes the submission of a further detailed remediation strategy that would capture the further mitigation measures required, as part of a detailed submission pursuant to a condition imposed on any planning permission.
302. During the operational phases, the Environmental Statement states with embedded mitigation the development is not expected to have a significant adverse impact on human health or sensitive receptors such as the LNR and River Wey and groundwater within the principal aquifer in the chalk because the design measures would break or reduce the pathway linkage from contamination sources to receptors. For example, the new STW

hardstanding and structures would act as a barrier to contaminated material in the landfill and prevent further infiltration of rainwater into the landfill with all surface water captured and treated itself within the new STW. These impermeable structures would break the migration pathway linkages and reduce risk to structures, human health, groundwater and surface water from vertical migration of gas and groundwater contamination.

303. Ground gas was detected within the landfill site. The applicant recognises the necessity for the protection of buildings, occupied structures and other facilities that are sensitive to a ground gas hazard and states they would be designed to the guidance and principles of BS8485 +A1 (2019)[2] including, for example, warning systems, with structures that are not sensitive to gas hazard in themselves, such as water retaining tanks, including gas collection and venting to ensure ground gases are vented safely and not displaced or liable to migrate to other receptors. Pipeline will be located above ground and any pipework that needs to be below ground would be fitted with clay stanks or other pathway severing techniques. The applicant states that a gas risk assessment for the construction works would be prepared which would include an action plan and required control measures.
304. The CGC has reviewed the submitted information including the Outline Remediation Strategy and comments that the mitigation measures proposed are reasonable but that a full Remediation Strategy should be provided as a pre commencement condition with further data provided following further monitoring and the installation of new wells. The CGC also comments that the submission of CEMP can also include enhanced monitoring and control for the period of construction prior to the completion of the platform that is to be constructed. This will also be accompanied by a gas monitoring plan for the monitoring of gas within the perimeter boreholes. The CGC is satisfied this can be addressed by condition. Guildford Environmental Health Officer (EHO) has also reviewed the documentation and is satisfied with the information provided and that, subject to the imposition of conditions that allow for the coordination with existing arrangements for data collection, raises no objection.
305. The EHO requests conditions for a remediation scheme, which is currently proposed, that would provide details for remediation and a verification report; and a condition for the reporting of unexpected contamination in the event that contamination is found at any time. There is a possibility that contamination maybe present on the application site that has not previously been identified. Officers recognise that such circumstances can occur, and a suitably worded condition can be imposed that covers this matter requiring the submission of a scheme detailing how such unknown contamination is to be dealt with. The EHO also requests long term monitoring and maintenance for the effectiveness of the remediation and Officers are satisfied this can be covered by condition.
306. Officers recognise the proposal would involve construction works on a historic landfill which could have impacts on displacement of pollutants. Officers are aware there are gas ventilation and a gas curtain on the industrial estate. Officers consider that with the imposition of conditions requiring a remediation strategy, gas and groundwater monitoring, a CEMP and a condition for unidentified contamination, that the proposal would meet the requirements of the development plan.

#### *Previously Unidentified Contamination*

307. There is a possibility that contamination maybe present on the application site that has not previously been identified. Officers recognise that such circumstances can occur, and a suitably worded condition can be imposed that covers this matter requiring the submission of a scheme detailing how such unknown contamination is to be dealt with.

#### **Noise and Vibration**

308. Unwanted sound may have an adverse effect on the environment and on the quality of life enjoyed by individuals and communities. Paragraph 174 of the NPPF 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 further states 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.

309. Policy 14 (of the SWLP requires that waste development does not result in unacceptable impacts on communities and the environment including public amenity and safety in respect of impacts caused by noise. Saved Policy G1(3) of GLP states that amenities enjoyed by occupants of buildings are protected from unneighbourly development in terms of noise.
310. Paragraph 003 of the nPPG<sup>6</sup> states decision making needs to take account the acoustic environment and in doing so, consider whether or not a significant adverse effect, an adverse effect or a not so good standard of amenity is occurring or likely to occur. In line with the Explanatory note of the noise policy statement for England, this would include identifying whether the overall effect of the noise exposure (including the impact during the construction phase wherever applicable) is, or would be, above or below the significant observed adverse effect level<sup>7</sup> (SOAEL) and the lowest observed effect level<sup>8</sup> (LOAEL) for the given situation.
311. Paragraph 005<sup>9</sup> outlines that noise begins to create an adverse effect when the noise starts to cause small changes in behaviour and attitude. The noise therefore starts to have an adverse effect and consideration needs to be given to mitigating and minimising those effects. When increasing noise exposure above the significant observed adverse effect level, this causes a material change in behaviour such as keeping windows closed for most of the time or avoiding certain activities during periods when the noise is present. The planning process should be used to avoid this effect occurring by use of appropriate mitigation such as altering the design and layout.
312. Paragraph 006<sup>10</sup> recognises the subjective nature of noise means that there is not a simple relationship between noise levels and the impact on those affected. These factors include the source and absolute level of the noise together with the time of day it occurs, type of noise, how the noise relates to the existing environment, noise events for non continuous sources of noise, spectral content of the noise; and arrangement of surfaces and infrastructure to absorb noise.
313. Surrey has produced its own 'Guidelines for Noise and Vibration Assessment and Control' (the Surrey Noise Guidelines 2020). These Guidelines echo the approach set out in the NPPF and nPPG. The Guidelines include a section on waste and recognises that waste facilities can involve potentially noisy plant and activities that may warrant control and mitigation. The Guidelines provide a methodology for undertaking a noise assessment for waste facilities.
314. BS4142:2014 describes methods for assessing the likely effects of sound on premises used for residential purposes and can be used to assess sound from proposed, new, modified, or additional industrial/ commercial sources. BS4142 describes that noise from a specific sound is giving a rating level and an adjustment/ correction factor according to the characteristics of the sound (tone, impulse, intermittent or other acoustic feature). If there are more than one characteristic (i.e., tonal, and impulsive characters) present,

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<sup>6</sup> Paragraph: 003 Reference ID: 30-003-20190722

<sup>7</sup> Significant observed adverse effect level: This is the level of noise exposure above which significant adverse effects on health and quality of life occur.

<sup>8</sup> Lowest observed adverse effect level: this is the level of noise exposure above which adverse effects on health and quality of life can be detected.

<sup>9</sup> Paragraph: 005 Reference ID: 30-005-20190722

<sup>10</sup> Paragraph: 006 Reference ID: 30-006-20190722

then two corrections can be taken into account. The level of impact is assessed by comparing the rating level of the specific sound source with the background sound level. The greater the difference the greater the impact depending on context. A difference of around +5dB is likely to indicate an adverse impact depending on context.

315. A noise impact assessment has been submitted in support of the application and is included in Chapter 7 of the ES which has assessed construction noise, road traffic noise and operational noise. This noise assessment has followed guidance in DMRB LA111<sup>11</sup> for assessing construction impacts with a study area of 300m from the application site. The assessment has considered worst case closest receptors to identify any potential impacts. For operational noise, the noise assessment has been carried out in accordance with BS4142. The noise assessment includes details of the baseline noise surveys that were carried out to inform the assessment process. The noise climate in the immediate vicinity of the application site is dominated by traffic noise from the A3. Away from the A3, road traffic noise reduces, and other noise sources may then become dominant. The noise assessment has chosen to use the most sensitive classification of receptors i.e. residential dwellings, education and medical facilities.

### *Construction Phase*

316. Construction activities have the potential to adversely impact sensitive receptors near to the application site for a temporary period. Construction activities for the proposal will typically be undertaken during the daytime with construction working shifts defined to be between Monday to Friday between 07:00 to 19:00 and Saturdays between 07:00 to 13:00. This includes all work at the new STW, the outfall and the shaft construction. The exception to this will be the construction of the transfer tunnel between the shafts, which will require continuous working below ground to reduce potential settlement and mitigate construction working risks. Construction of the transfer tunnel will therefore take place 24 hours per day, 6 days per week, with shifts and construction work commencing both within compounds shaft working areas and below ground at 00:00 every Monday and running uninterrupted until 23:00 every Saturday. The set-up activities for tunnel construction and the Tunnel Boring Machine (TBM) are expected to be limited to daytime only. No works are intended to take place on Sundays or Bank Holidays, unless unstable ground conditions are encountered during tunnel construction that require continuous working to take place on a Sunday. Therefore, the assessment of construction noise for those receptors in proximity to the transfer tunnel works have been assessed over the three construction periods of the day of 07:00 – 19:00; 19:00 – 23:00; 23:00 – 07:00, in line with BS 5228-1<sup>12</sup>.
317. The noise assessment has broken down the construction phase into components including: daytime site establishment, daytime transfer tunnel works, evening and night time during transfer tunnel works, daytime new STW works; and daytime new outfall. The construction noise has been based on all plant operating simultaneously, at the same location, without any mitigation. The County Noise Consultant (CNC) has reviewed this approach and comments this is acceptable and is considered a worst case scenario. The construction phase at the new STW would be the use of RIC for the ground improvement works as part of the land remediation strategy and then piling at multiple locations using a precast hammer driven piling assuming a worst case scenario.
318. During site establishment, predicted noise levels are likely to exceed the SOAEL at Carters Close, Waterside Road, Stoke Mill Close and other noise sensitive receptors at these locations, without mitigation. At these receptors, levels of up to 75 dB LAeq (day only) are predicted. The CNC has commented that whilst this results in a major adverse impact, as this impact is unlikely to last for more than a period of 10 days in any 15 consecutive days, this would reduce the effect to not significant but that appropriate mitigation measures will be required.

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<sup>11</sup> Design Manual for Roads and Bridges: Noise and Vibration

<sup>12</sup> Code of practice for noise and vibration control on construction and open sites – Part 1: Noise

319. During the tunnel works, predicted noise levels are likely to exceed the SOAEL at Mangles Road, Stoke Mill Close and other noise sensitive receptors at these locations, without mitigation. The CNC comments that at Mangles Road levels of up to 59 dB LAeq (day)/ 58 dB LAeq (evening and night) are predicted. At Stoke Mill Close levels up to 75 dB LAeq (day) and 70 dB LAeq (evening and night) are predicted. The CNC states this results in a major adverse impact. The CNC comments that it is noted that these works would take place at night and is likely to last for more than a period of 10 days in any 15 consecutive day therefore without mitigation a significant adverse effect has been identified. The CNC states that robust mitigation measures will need to be considered.
320. During the shaft works predicted noise levels are likely to exceed the SOAEL at closest offices on the Slyfield Industrial Estate without mitigation. Levels up to 78 dB LAeq are predicted however based on the sensitivity of the receptors this results in a moderate adverse impact and because the impact is unlikely to last for more than a period of 10 days in any 15 consecutive days, this reduces the effect to not significant. However appropriate mitigation measures are required.
321. The noise assessment also includes information on the additional traffic during construction and whether this would cause any noise impact. It should be noted that construction traffic would avoid night time movements. This has shown that the additional construction traffic would increase by up to 0.5 dBA as a worst case on Moorfield Road which is quantified as a negligible impact magnitude which is a minor adverse effect at residential receptors and is therefore not significant. During the tunnel boring, any materials would be stored and stockpiled at the shaft location ready for onward transportation during the daytime.
322. The CNC having reviewed the noise assessment for this phase raises concerns about the high noise levels that could be experienced at nearby residential receptors during this phase, in particular night time working. It is noted that the noise assessment states that with the imposition of mitigation measures, the exceedances above the SOAEL at sensitive receptors would be mitigated and minimised. The noise assessment proposes the use of best practicable means to reduce noise levels including:
- The quietest available plant or machinery
  - Equipment fitted with appropriate silencers, mufflers or acoustic covers
  - Operate plant and equipment facing away from sensitive receptors
  - Acoustic barriers when noise cannot be sufficiently reduced
  - All workers on site being made aware of the need to keep noise and disruption to a minimum
  - Movement of vehicles to and from the site be controlled to minimise noise and disturbance
  - Careful selection of working methods and programme
  - Shutting down of equipment when not in use
  - Handling of all materials in a manner that minimises noise
  - Switching audible warning systems to the minimum setting
  - Engaging in community liaison

The noise assessment comments that implementation of best practicable means should reduce noise by 5dB. The applicant has gone on to state that it is recognised that noise from the tunnel shaft I location E8 requires further specific measures and they have explored this by increasing the separation distance between the plant and the receptor and the generator would be positioned facing away from sensitive receptors.

323. The applicant proposes that a Control of Pollution Act 1974 Section 61 (S61) Prior Consent application be prepared but this would be submitted to the Environmental Health Department at Guildford Borough Council. The CNC has commented on this mitigation measure and welcomes it. Officers are aware that a S61 consent can provide for details to come in of the works and method by which activities at to be carried out and

the steps proposed to be taken to minimise noise resulting from these works. If the local authority considers that the S61 application contains sufficient information for the purpose and that, if the works are carried out in accordance with the application, it would give its consent to the application. Conditions can be attached to such a consent. However, Officers are of the opinion that a condition requiring the entering into a S61 consent by the applicant with the environmental health department cannot be the subject of a condition for this proposal because it would involve another authority. Instead, Officers consider that conditions should be imposed requiring the submission of a CEMP that would set out the same requirements as a S61 consent and that a condition be imposed requiring continuous noise monitoring of the construction activities at the request of the CNC, at the most affected sensitive receptors. The CNC comments this include requirements relating to the provision of noise insulation.

324. The CNC is concerned that there is a potential risk of adverse impact during evening/night time working hours during the construction phase of the proposal. As such, whilst the CNC does not object to the proposal, the CNC recommends continuous noise monitoring is put in place to protect residents/sensitive receptors near the works and this is provided for by condition. Officers concur with this and a condition is proposed for the submission not only of a CEMP but a noise and vibration management and monitoring plan for this matter. Officers recognise the CNC comments, concerns and recommendations and have taken this on board with conditions.

#### *Operational Phase*

325. Noise impacts from the operational phase have been assessed for the new STW as the outfall and transfer tunnel are not likely to generate noise during this phase. A noise model was used to determine the specific sound level. The noise assessment comments that at night, noise sources would be from automatic plant and equipment such as grit detractors and primary settlement tanks whereas during the day these automatic processes would still continue but there would also be noise from the sludge pumping and dewatering processes. As a worst-case assumption, the noise assessment included all plant and equipment operating continuously.
326. The noise assessment adopted representative background sound level, LA90 for the operational assessment for sensitive receptors the lowest being 34 LA90, 15 min at Jacobs Well Cottage, Burpham Court Farm Cottages and Burpham Court Farm Open Space SANG<sup>13</sup>. The assessment also included an acoustic feature correction of +3dB as the sound from the STW might contain tonality components. The CNC comments this is acceptable.
327. The noise assessment presented within the ES demonstrates that noise from the operation of the new STW corrected by acoustic features is not likely to result in a significant adverse effect at the location of the closest residential receptors. This is because the predicted noise level from the new STW operation does not exceed the existing background sound level at any of the residential noise sensitive receptors. This includes the future residential receptors proposed at the WUV development to the south, thus meeting the requirements of BS4142 and Surrey County Council Noise Guidelines. Furthermore the noise assessment states that the operational noise from the new STW is not likely to alter the existing baseline noise levels at any of the receptor locations during the daytime. During night time the estimated ambient sound levels increase up to 0.2 dBA than the existing baseline however this is not considered significant. With regards to office buildings on the Slyfield Industrial Estate, the operational noise levels at the worst case, would meet the criteria set out in BS 8233:2014<sup>14</sup> to achieve good internal noise level inside offices. The noise assessment also included an assessment of

<sup>13</sup> Source: table 7-18: Representative background sound level, LA90 adopted for the operational assessment Environmental Statement December 2021.

<sup>14</sup> Guidance on sound insulation and noise reduction for buildings

potential impact on users of the proposed SANG from the new STW operational noise and found noise levels would be below the noise limit.

328. No significant adverse impacts have been predicted from the operation of the new STW and therefore no specific mitigation measures have been provided. The applicant states that the operation of the new STW would include management practices to minimise the noise levels generated during its operation including equipment not left running, the servicing of plant and equipment, and night time activities for routine or emergency maintenance minimised. The CNC has reviewed this and states the mitigation measures proposed are reasonable and recommends the imposition of conditions for this part of the proposal.

#### *Vibration*

329. The proposal involves the use of RIC as part of the construction phase over the historic landfill. The proposal also involves the use of tunnel boring equipment to create the tunnel shaft. Both of these matters could give rise to vibration. Policy 14 of the SWP states that waste related development should not result in unacceptable impacts on communities and the environment from vibration. Policy G1(3) of the GBLP seeks to protect the amenities enjoyed by occupants of buildings from unneighbourly development in terms of vibration. The applicant has provided an assessment of likely vibration impacts associated with the construction phase of the proposal within the ES.
330. The effect of ground-borne vibration on people inside buildings is often assessed using the Vibration Dose Value (VDV) index, as described in BS 6472-1:2008<sup>15</sup>. BS 5228-2:2009 + A1:2014, hereafter BS 5228-2<sup>16</sup>, states that "Human beings are known to be very sensitive to vibration, the threshold of perception being typically in the Peak Particle Velocity (PPV) range of 0.14 millimetres per second (mm/s) to 0.3mm/s. Vibrations above these values can disturb, startle, cause annoyance or interfere with work activities. At higher levels they can be described as unpleasant or even painful. Vibration levels <0.3mm/s might be just perceptible in sensitive situations whereas 0.3 to 1.0mm/s might be just perceptible in residential environments.
331. The applicant has provided a vibration assessment within the ES which has focused on vibration levels that could occur for any activities likely to generate vibration. These include earthwork compaction activities, RIC and piling and follows the methodology in BS 5228-2 for calculating the PPV. The CNC has reviewed the vibration assessment and comments the use of this BS is an acceptable approach. The assessment states that adverse impacts from vibration are limited to 100m distance from the activities being undertaken. The assessment identifies that vibration levels are likely to be above the SOAEL at the nearest residential receptors to the earthwork compaction and tunnelling activities, without mitigation. In accordance with the guidance provided in BS 5228-2, vibration levels exceeding the SOAEL are likely to cause complaints from occupants but can be tolerated if prior warning and explanation has been given to the occupants. Therefore, this has been considered as part of the best practice mitigation measures adopted. The assessment outlines that moderate impacts are only anticipated when the plant is located at the closest point and they would reduce with distance.
332. During the RIC and piling works required, the only sensitive receptors located within the study area are offices at Slyfield Industrial Estate. There are three such offices, the closest (i.e. DAF Barnes) is located at 25m from the RIC works and 50m from the piling works.

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<sup>15</sup> BS 6472-1:2008: Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting (BSI, 2008).

<sup>16</sup> Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration

333. The vibration assessment has broken down the construction phase into components including: daytime earthwork compaction works, daytime RIC works, daytime precast (hammer) driven piling works; and daytime, evening and night time tunnelling. Of these activities, predicted vibration levels are likely to exceed the SOAEL at Carters Close and Waterside Road; and Stoke Mill Close for earthwork compaction works and at Stoke Mill Close for the TBM tunnelling, where, without mitigation, predicted levels are likely to exceed 1.0 mm/s which is a moderate adverse impact. However, because the impact is unlikely to last for more than a period of 10 days in any 15 consecutive days, the predicted effect is deemed not significant.
334. The CNC has reviewed the assessment, the findings and reasons and comments that whilst no significant vibration effects have been identified, mitigation measures have been proposed and conditions should be imposed such as working hours, limits and monitoring to control vibration. Officers concur that to ensure there is no significant adverse impact on amenity that conditions should be imposed. The applicant proposes mitigation measures including a lower setting of the plant and use of alternative plant, alongside the use of S61 Consent. For the RIC and piling best available techniques are proposed. The applicant states a comprehensive and informative community relations programme would be adopted. The CNC has reviewed the applicant's comments and recommended mitigation measures and whilst the CNC does not object to the proposal the CNC does comments, as with noise above, that due to the potential risk of adverse impacts during evening/ night time working hours, the CNC recommends continuous construction vibration monitoring in place to protect residents/ sensitive receptors near the works. The CNC states that this can be dealt with through a CEMP alongside a monitoring condition.

#### *Conclusion on noise and vibration*

335. Officers recognise that the proposal includes elements where there is a potential risk of adverse impacts during the evening/ night time working hours. This is from the continual tunnel boring at the shafts. Whilst the construction compound set up could give rise to noise impact, this activity would be temporary and limited to the day time. Officers agree with the CNC that mitigation measures are necessary for these two aspects of the construction phase to ensure protection of residential amenity around Carter Close, Stoke Mill Close and Waterside and that locality. Because of this Officers consider noise and vibration should be covered within the CEMP however Officers also consider that there is a requirement for a noise and vibration management and monitoring plan which would set out what monitoring would take place during the construction phase to ensure no significant adverse impact occurs. With the imposition of such conditions, Officers are satisfied the proposal would meet the requirements of Policy 14 and Policy G1(3).

#### **Air Quality**

336. The proposal would involve elements that could give rise to air quality issues. These include the construction of the tunnel shafts and the new STW including plant and machinery and the movement of Heavy Goods Vehicles to/ from the site during the construction and operational phases. Policy G1(3) of the GBLP states that the amenities by occupants of buildings are protected from unneighbourly development in terms of dust, pollution and smell. Policy ID3 of the GBCLP2019 states new development will be required to provide and/ or fund the provision of suitable access and transport infrastructure services that make it acceptable, including the mitigation of its otherwise adverse material impacts on air quality within the context of cumulative impacts of approved developments and site allocations.
337. 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 dust and fumes, odour and air quality including the impacts on identified AQMAs and Clean Air Zones and cumulative impacts.

338. Paragraph 174(e) of the NPPF 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 air pollution. The development should, where possible, help to improve local environmental conditions such as air quality. Paragraph 186 of the NPPF states that planning decisions should sustain and contribute towards compliance with relevant limited values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and Clean Air Zones, and the cumulative impacts from individual sites in local areas, and opportunities to improve air quality or mitigate impacts should be identified.
339. Paragraph 188 states that local planning authorities should focus on whether the development itself is an acceptable use of the land and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. The paragraph states that “*Local planning authorities should assume that these regimes will operate effectively*”.
340. Whilst a policy document for national infrastructure, the National Policy Statement for Waste Water 2012 recognises that the construction, operation and decommissioning of sewage treatment works can involve emission to air which could lead to adverse impacts and identifies issues that may be material to decision making.
341. The NPPG also provides guidance on air quality and dust. Para 005<sup>17</sup> recognises that air quality is a consideration relevant to the development management process during the construction and operational phases and whether occupiers or users of the development could experience poor living conditions or health due to poor air quality. Paragraph 006<sup>18</sup> goes on to say that considerations that may be relevant to determining a planning application include whether the development would: lead to changes in vehicle related emissions in the vicinity of the proposals; introduce a new point source of air pollution; expose people to harmful concentrations of air pollutants including dust; give rise to potentially unacceptable impacts (such as dust) during construction for nearby sensitive locations; and have a potential adverse effect on biodiversity.
342. The application site is not within an AQMA. The closes AQMA lies some 4.8km to the south in Guildford. Relevant assessments in relation to air quality have been undertaken as part of the Environmental Impact Assessment (EIA) and are covered in chapter 6 of the ES.

#### *Dust*

343. This section of the report addresses dust that may arise from the activities proposed which would predominantly be the construction phase for the transfer tunnels and the construction of the new STW. There may also be dust emissions from the compound areas as HGVs and any plant are moved around there.
344. The Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction (2014) states that emissions of dust to air can occur during the preparation of the land (demolition, land clearing and earth moving) and during construction. Emissions can vary from day to day depending on the level of activity, the specific operations being undertaken and weather conditions. A large proportion of the emissions result from the site plant and road vehicles moving over temporary roads and open ground. If mud is allowed to get onto local roads, dust emissions can occur at some distance from the originating site. The scale of these impacts depends on the dust suppression and other mitigation measures applied. It is therefore important, that any assessment on dust classifies the risk from the impact to allow for the identification of mitigation measures that are commensurate with the risk that is identified.

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<sup>17</sup> Paragraph: 005 Reference ID: 32-005-20191101

<sup>18</sup> Paragraph: 006 Reference ID: 32-006-20191101

345. The most common impacts from the demolition and construction phase are dust soiling from activities on the site which can be from all size fractions, and increased ambient PM10 concentrations which could lead to health impact. There could also be increased risk from the release of other pollutants such as asbestos fibres. Dust can also affect sensitive vegetation and ecosystems. For on site plant/ machinery use, the IAQM guidance outlines that in the vast majority of cases they will not need to be quantitatively assessed and consideration should be given to the number of plant/ vehicles and their operating hours and locations to assess whether a significant effect is likely to occur.
346. Guidance on Monitoring in the Vicinity of Demolition and Construction Sites (2018) recognises that the construction of buildings, roads and other infrastructure can have a substantial, temporary impact on local air quality. The document states that the most common impacts are increased particulate matter (PM) concentrations and dust soiling and depending on the risk of dust effects occurring, monitoring may need to be carried out during both demolition and construction activities to ensure that the applied mitigation measures are effective in controlling dust emissions, and that there are no significant impacts on the surrounding environment.
347. The Air Quality Assessment (AQA) undertaken as part of the EIA, identified that the main potential impacts would be dust emissions from construction related activities, which could affect amenity, human health and sensitive ecological sites. The AQA outlines key sensitive receptors including residential properties, schools, care homes and recreational spaces alongside the ecological receptors including the SSSI, SPA and SNCI. The AQA has used as part of its assessment the IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning, which whilst this is not a mineral site, this document provides useful information with regards to dust assessments. This Guidance sets out how a Dust Impact Assessment should be carried out to estimate the likely impact of the effect of dust based upon the level of dust emission from the site, the sensitivity of receptors and the effectiveness of the pathway. For example, a highly effective pathway with a high level of source emissions from site would lead to a high level of risk which when experienced by a highly sensitive receptor (a hospital) would result in a substantial adverse effect. This Guidance also recognises that the main potential effect from mineral sites is disamenity due to dust deposited on surfaces. The AQA also assesses the proposal against the IAQM Guidance on assessing construction dust (2016). For the purposes of the AQA the proposal has been split into two sections: the transfer tunnel, and the new STW and outfall pipes.
348. Using the IAQM Guidance, the AQA considers has assessed the scale and nature of the activities associated with the construction phase to assess the dust magnitude for different types of potential dust generating activities (demolition activities<sup>19</sup>, earthworks activities<sup>20</sup>, construction activities<sup>21</sup> and vehicle movement and trackout<sup>22</sup>) and assigned a risk classification for each of them which is used to define any mitigation required. For the transfer tunnel, earthworks is considered to be a medium dust emission magnitude, trackout is considered to be a large dust emission magnitude, with construction being considered a small dust emission magnitude. For the construction of the new STW

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<sup>19</sup> Demolition activities include: demolition of buildings and associated infrastructure within the planning application boundary, including the processing and storage of material associated with demolition and the removal of vegetation, walls and other site clearance activities.

<sup>20</sup> Earthwork activities include: establishing site compounds, ground stabilisation, excavations for tunnel shafts and the outfall pipelines, forming new haul roads and parking areas, installing drainage, topsoil stripping and storage of topsoil. Another source would be windborne dust from material stockpiles, storage mounds and exposed areas, which could occur if the wind speed was high enough and the stored or exposed material was dry and friable.

<sup>21</sup> Construction activities include: new STW buildings and infrastructure and associated activities relating to the construction of the site compounds

<sup>22</sup> Vehicle trackout include: construction-related vehicles moving on and around the construction areas emitting exhaust particulate matter and re-suspending loose material on the road.

(including the outfall pipes), earthworks, construction are considered to be a medium dust emission magnitude and trackout is considered to be a large dust emission.

349. The construction activities for shaft E8 will require the demolition of a single storey portacabin and three small single storey red brick buildings. Whilst it is anticipated that the demolition of these buildings will have been undertaken by Guildford Borough Council prior to the commencement of construction activities associated with the transfer tunnel, the demolition is included within the assessment of the proposal in case the Contractor is required to undertake the demolition.
350. The AQA then assessed each activity with the sensitivity of the area for human receptors identifying the highest sensitivity are residential properties in proximity to the transfer tunnel. For the Riverside Park LNR and SNCI, based on the proximity and the value of the sites' ecological assets, the AQA considered it a low sensitivity receptor with regard to dust deposition from the proposal. The AQA then assessed the overall risk to human health and ecological receptors from dust and identified the overall risk for human receptors is between negligible and medium for the transfer tunnel and between low and medium risk for the new STW and outfall pipes. The medium risk being from dust soiling. For the Riverside Park LNR and SNCI, the overall risk assessment was found to be between negligible and low for all dust generating activities for the development as a whole.
351. The AQA identifies the risk of the dust impacts from each of the activities that can be associated with the construction phase as detailed above based on nearby receptors. This is then used to identify mitigation and control measures that are consistent with the level of risk. The AQA has drawn such measures from the IAQM guidance including planning construction-related vehicles moving on and around the construction areas emitting exhaust particulate matter and re-suspending loose material on the road, managing exposed areas to prevent wind whipping using coverings and water suppression, covering skips, controlling drop heights and use of wheel washing.
352. The County Air Quality Consultant (CAQC) has reviewed the scope, assessment methodology and the baseline and agree with the information provided within the AQA on these matters. The CAQC has reviewed the assessment of dust risk impacts in the AQA and concurs with the findings and agrees with the list of measures proposed and recommends these are formalised in a Construction Environmental Management Plan (CEMP). Officers are satisfied that with the imposition of a suitably worded condition for the submission of a CEMP that includes the requirement for dust mitigation measures, that dust emissions can be controlled from the proposal not to have a significant adverse impact on the environment and amenity.

### *Air Quality*

#### HGV emissions

353. The proposal will give rise to a large increase in HGV movements during the construction phase of the development. The applicant states that for the operational phase, the number of HGV movements would be the same as existing. As such, the Environmental Statement includes an assessment on the impact of construction related HGV movements. This assessment has also included the cumulative impact of emissions of NO<sub>x</sub> from vehicles associated with the construction of the Development and the construction of the WUV development<sup>23</sup> on the A320 have the potential to affect Whitmoor Common SSSI, which forms part of the Thames Basin Heaths SPA.
354. The IAQM has produced guidance with regards to assist with the assessment of air quality impacts on nature sites<sup>24</sup> which can be used in the assessment of the Habitats Regulations

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<sup>23</sup> Planning application reference 20/P/02155

<sup>24</sup> IAQM "A guide to the assessment of air quality impacts on designated nature conservation sites" May 2020

Assessment<sup>25</sup>. The guidance provides details as to who should carry out a HRA and for what projects and that air quality specialists and ecologists should be involved in the review process of information submitted by an applicant to comply with the Habitats Regulations for a project that may have an impact on a European ecological designation. The Guidance states that where an appropriate assessment that is carried out for the proposal concludes that the project or plan will not result in an adverse effect on the integrity of the European site(s) being considered, consent may be granted. If adverse effect on the integrity cannot be ruled out, consent cannot be granted without further work, and this may influence the identification of further measures to address the predicted adverse effects. The matter of appropriate assessment is covered below. The guidance also covers potential impacts on habitats from nitrogen deposition and airborne pollution.

355. The EPUK and IAQM Guidance “Land-use Planning and Development Control: Planning for Air Quality” comments that there is a clear link between air quality and health in relation to PM<sub>10</sub>, PM<sub>2.5</sub> and nitrogen dioxide. The guidance outlines that any air quality issue that relates to land use and its development is capable of being a material planning consideration. The weight given to air quality in making a planning application decision, in addition to the policies in the local plan, will be dependent on such factors as:
- The severity of the impacts on air quality
  - The air quality in the area surrounding the proposed development
  - The likely use of the development i.e. the length of time people are likely to be exposed at that location
  - The positive benefits provided through other material considerations
356. The Guidance suggests a change in HGV flows of more than 25 annual average daily traffic (AADT) when within an AQMA or of 100 AADT elsewhere as an indicative trigger level for when an air quality assessment is required to specifically assess whether the increase or change in HGV movements could have an impact on air quality. With regards to cars/ vans, the threshold is higher with a change of 100 AADT within or adjacent to an AQMA or more than 500 AADT movements elsewhere.
357. The AQA states that the construction phase is anticipated to last 32 months, with the intensity of construction activity varying. The applicant states that out of the total construction period of 32 months, there are only four months where total HGV trips per day range between 60 and 180 (30-90 deliveries), seven months where the total HGV traffic ranges 40 and 60 trips per day, ten months where the total HGV traffic ranges 20 and 40 trips per day, and 11 months when the total HGV traffic is less than 20 trips per day. This indicates that the average number of trips is 55 per day. This is below the threshold of 100 as outlined in the IAQM guidance.
358. The AQA has scoped out impact from HGV emissions for the operational phase as the total number of permanent staff at the new STW is expected to be the same as at the existing STW and all operational traffic for the new STW will use the same access routes to the site, accessing Slyfield Industrial Estate via the Moorfield Road Junction with the A320 Woking Road.
359. Because the number of HGV movements associated with the construction phase falls below the IAQM guidance threshold and because the operational phase would operate in the same manner as the current STW, the County Air Quality Consultant, having reviewed the AQA, concurs that the impact on human health receptors from HGV traffic during the construction and operational phases can be scoped out and the impacts are not likely to be significant.

### Generators

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<sup>25</sup> As required by the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)

360. The proposal would involve the use of two 8MW<sup>th</sup> stand-by diesel generators for use as a back-up power supply if there is a mains power cut. The standby generators will be classed as a new Medium Combustion Plant under the Medium Combustion Plant Directive (MCPD) and will therefore be required to comply with the emission limits set out in the MCPD. An Environmental Permit from the Environment Agency will be required, and the Planning Statement advises that, in accordance with NPPF paragraph 188, it can be assumed that this pollution control regime will operate effectively. While that is the case, the planning authority still needs to assure itself that the residual effects are not significant. There is the potential for emissions when the generators are routinely tested and when used in an emergency.
361. The CAQC requested further information with regards to the number of hours that the generators would be tested each year as if this exceeds 18 hours, then the short term NO<sub>2</sub> objective<sup>26</sup> could be at risk of exceedance. The applicant has advised that “*Thames Water’s maintenance standard for standby generators requires routine run-up of 1 to 1.5 hours, which is carried out every month. Annual service and an annual black start test would be combined with the monthly tests. Based on the worst case 1.5 hours running per month, this would equate to 18 hours/year.*” As the short-term objective for NO<sub>2</sub> permits 18 hours of concentrations above 200 µg.m<sup>-3</sup>, the CAQC is of the opinion, the testing of the generators is unlikely to lead to an exceedance of the short-term NO<sub>2</sub> objective and we have no further comments to make on the scope.

#### Habitats Assessment

362. The CAQC comments that the estimated increase in vehicle flows is below the criteria set out in the IAQM 2020 *Guidance on designated nature conservation sites*. Therefore, on its own, the construction of the new STW is unlikely to adversely affect nature conservation sites. However, concern was raised by the CAQC concerning the cumulative impact from HGV emissions during the construction phase of the STW and the WUV and the impact on Whitmoor Common SSSI in terms of critical load and nitrogen deposition from NO<sub>x</sub> and ammonia. The CAQC requested clarification about the decreases in background concentrations and deposition rates up to and during the period of construction of the STW. The CAQC sought confirmation that the applicant demonstrate air quality impacts can be screened out and advised the County Ecologist be consulted.
363. The requirement for ‘appropriate assessment’ of projects prior to the grant of planning permission arises from Regulation 63 of the Conservation of Habitats & Species Regulations 2017 (Statutory Instrument 2017 No.1012) (as amended). The requirement applies to projects that are likely to give rise to significant impacts, alone or in-combination, on Special Protection Areas (SPAs) or Special Areas of Conservation (SACs). As a matter of policy in the UK, sites designated under the Ramsar Convention on Wetlands of International Importance enjoy the same level of protection as SPAs and SACs. In Surrey the county’s two Ramsar Sites are coincident with SPA and/or SAC designations. All SPAs, SACs and Ramsar Sites are composed of Sites of Special Scientific Interest (SSSIs).
364. The Habitat Regulations Assessment (HRA) process can involve up to four stages: Stage 1 – Screening; Stage 2 – Appropriate assessment; Stage 3 – Assessment of alternative solutions; Stage 4 – Assessment of compensation and imperative reasons of over-riding public interest. The aim of the HRA process is to ascertain whether the project will adversely affect the integrity of the SPA or SAC concerned. Mitigation measures can be considered at Stage 2 (Appropriate Assessment). HRA is not required for projects that are directly connected with or necessary to the management of the SPA or SAC of concern. This proposal is not connected with or necessary to the management of any of the five SPAs or SACs considered by this assessment. The Environmental Statement included a HRA Screening Report which included a review of all SPAs and SACs located within 10 kilometres of the application site and within 30 kilometres for those designated for mobile species (e.g. bats).

<sup>26</sup> National air quality objectives [Air Quality Objectives Update.pdf \(defra.gov.uk\)](https://www.defra.gov.uk/air-quality-objektives-update.pdf)

365. The CPA has carried out an Appropriate Assessment (AA) of this proposal reviewing the applicant's submitted information. The AA has reviewed the key threats/ pressures likely to interfere with the attainment and maintenance of the conservation objectives for the designated sites in relation to this planning application. The AA concludes that for all the threats/ pressures bar that of "Changes arising from air pollution (nutrient nitrogen deposition)", there is no further assessment required. The potential impact on Whitmoor Common SSSI component of the Thames Basin Heaths SPA because of additional traffic generated by the development during the construction phase requires assessment because it is likely to travel along the section of the A320 (Woking Road) that dissects the Whitmoor Common SSSI.
366. The Whitmoor Common SSSI component of the SPA covers c.166.03 hectares and is located c.1.3 kilometres north-west of the application site. The most recently reported condition assessment for the SSSI notes that 98.67% of the site is in 'favourable' or 'unfavourable – recovering' condition. The application site is located too distant from the SSSI for on-site construction or operational phase activities to be a viable source of harm to the SPA bird species or their supporting habitats.
367. The SSSI is dissected by a number of established roads, including the A320 (Woking Road) which links the settlements of Guildford to the south with Woking to the north. The submitted Transport Statement (TS) predicts that 92% of HGV traffic would travel to the application site from the north along the A320 during the site establishment and groundworks phase and that 91% of HGV traffic would travel from the north along the A320 during the civil works phase. For all other phases of the development most of the traffic is predicted to access the application site from the south and would therefore not travel along the section of the A320 that passes through Whitmoor Common SSSI.
368. The section of the A320 (Woking Road) that passes through Whitmoor Common SSSI is bounded to the west by Unit 8 (Whitmoor Common) which is classed as exhibiting 'favourable' condition and to the east by Unit 9 (Whitmoor Common) which is classed as exhibiting 'unfavourable – recovering' condition. For Unit 9 the main reasons for the 'unfavourable – recovering' condition were the presence of invasive scrub and bracken which required management. The submitted TS predicts that peak construction HGV traffic would occur over a period of c.4 months with a maximum of 90 HGVs per day. The project is expected to involve a construction phase of 32 months duration in total. For the operational phase of the development average daily traffic is anticipated at 72 trips per day, a reduction on the 100 trips per day generated by the existing STW.
369. The heathland habitats of the SSSI on which the three SPA bird species are dependent are sensitive to change as a consequence of nutrient nitrogen deposition from oxides of nitrogen (NO<sub>x</sub>) and ammonia (NH<sub>3</sub>). The applicant responded to those concerns in further information (dated 8 March 2022) which included evidence relating to the cumulative effects on air quality along the A320 through Whitmoor Common of the Weyside Urban Village development and the proposed new STW. On the advice of the County Ecologist, Natural England was consulted on the submitted information.
370. Natural England responded to this specific matter stating that the SSSI officer who knows the site and its sensitivities very well, does not have any concerns regarding this temporary impact on those particular units of the SSSI. Natural England went on to comment that although there is an identified issue with NO<sub>x</sub> and NH<sub>3</sub> the SSSI officer considers it unlikely that detectable effects on sensitive features are likely to arise from the proposed development, on the basis that the contribution to the existing background NO<sub>x</sub> and NH<sub>3</sub> from a temporary increase in traffic flow is unlikely to be significant. As such Natural England raise no concerns regarding the temporary impact of the construction of the new sewage treatment works.
371. The CPA AA concludes that based on the advice from Natural England that the proposed development would not give rise to likely significant effects on those populations as a result

of changes in the heathland habitats within the SPA as a consequence of nutrient nitrogen deposition from vehicle emissions during the construction phase of the development. No additional mitigation measures are required in order for the CPA to conclude that there would be no likely significant effects on the SPA as a result of the development proposed under planning application GU22/CON/00006 alone or in-combination. Officers are satisfied that through the AA, the proposal meets the requirements of the Habitats Regulations with respect to the protection of European sites and addresses the concerns that had been raised by the CAQC and the County Ecological Advisor.

### Odour

372. The new STW is located on a historic landfill site which has been identified as containing potentially odorous ground contamination, such as hydrocarbons from industrial wastes, and odours generated from the decomposition of waste. Construction works would include excavation and piling or drilling into areas of the historic landfill site which could contain partially decomposed waste, which could result in odour emissions and subsequent adverse impacts at nearby human receptors. Excavation works for transfer tunnel shaft E2 could also lead to potentially odorous leachate being exposed at the surface. Although the methods proposed during the construction phase are designed to avoid odour emissions, the excavation and disturbance of the historic landfill site, including exposed leachate, have the potential to emit odours and affect the amenity of local sensitive human receptors. The proposed design of the STW seeks to limit odour emissions by incorporating odour containment, control and abatement, which would be in operation during commissioning. However there remains the potential for residual odour to be emitted from some areas of the STW when it is in operation which could affect amenity of nearby receptors. This part of the report covers this matter and whether the proposed development will be a suitable use of the land.
373. The IAQM Guidance on the assessment of odour for planning (2018) sets out details to assist practitioners involved in odour assessment for planning purposes and is a useful tool for assessing this application. The Guidance states that ideally, significant sources of odour should be separated from odour-sensitive users of the surrounding land (sensitive receptors); failing this, it may be possible to employ control and mitigation measures to make a proposed development acceptable from a land-use perspective. New proposals for such developments may require an odour impact assessment to be submitted, either as a stand-alone assessment or as part of an Environmental Statement, to accompany the planning application. As with contamination, for an adverse effect to occur, there must be a source-pathway-receptor chain present with the scale of impact determined by FIDO<sup>27</sup> factors and the sensitivity of the receptor. The Guidance sets out an approach to assess potential odour impact and effect on receptors from a proposal. The applicant has submitted an Odour Impact Risk Assessment (OIRA) based on the approach set out in the IAQM guidance, which is to identify a baseline, the location of receptors, the odour sources and mitigation including whether further mitigation is required. The OIRA has used data collected from an assessment of the existing STW in 2016 for the baseline. The CAQC having reviewed the OIRA agrees with this approach.
374. The OIRA has assessed the likely magnitude for odour impact which has been predicted by detailed atmospheric dispersion modelling in accordance with the Environment Agency H4 Odour Management guidance document and the 2014 IAQM Guidance for moderately offensive odours which is based on odour exposure and receptor sensitivity. The CAQC has reviewed this approach and concurs with this methodology. Measurements for this are in European odour unit per cubic metre ( $ou/m^3$ ) with  $1\ ou/m^3$  being just detectable odour and  $10\ ou/m^3$  being a distinct odour with highly sensitive receptors which is likely to result in complaints. The OIRA identifies there are multiple receptors including both residential and employment premises at Slyfield Industrial Estate, and has given an overall significance effect on the surrounding area.

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<sup>27</sup> Frequency, Intensity, Duration and Offensiveness

375. For the construction phase the applicant states any temporary increase in odour during construction when opening of the existing pipework to connect to the transfer tunnel will be minimised by reducing the duration that existing pipework exposed before new connection is made. The applicant also states that trials would be undertaken to identify the composition of the historic waste where piling is to take place and if any materials or contaminants that could generate odour are identified, then a Construction Odour Management Plan would be required which would include details on the management of odour and how aspects should be dealt with. The applicant proposes that this management plan should form part of the wider CEMP submission. The applicant states that using piles and RIC would minimise odour during this phase as it removes the need to excavate the historic waste but if encountered, any odorous waste mass and/ or leachate would be collected for removal. The use of clean material to cover and compact and stabilise the landfill would also reduce the disturbance reducing potential for odour emissions.
376. For the operational phase elements which could emit odours from the proposal include the control unit discharge stacks and inlet works, primary tanks, storm tanks/ hoppers, activated sludge plant and sludge area. To mitigate against this, the OIRA outlines that these elements would be covered (i.e. not left to the open air) with air extracted and treated in two odour control units. The OIRA outlines that for all high sensitivity receptors, the predicted 98th percentile is below  $3.0 \text{ ou/m}^3$  and the odour impact is described as negligible or minor adverse. For all medium sensitivity receptors, the predicted 98th percentile is below  $5.0 \text{ ou/m}^3$  and the odour impact is described as negligible or minor adverse. The assessment considers impacts within the WUV and includes a potential employment area, a potential traveller's site and potential residential development. The highest prediction at receptors R19 to R27 within the WUV is  $1.13 \text{ ou/m}^3$  for which the odour impact description is negligible even for the highest sensitivity. In other words, even if the receptor types changed within the site boundary, the impact would still be described as negligible. The CAQC having reviewed the OIRA findings agrees with this conclusion.
377. The proposal would be managed in accordance with an Odour Management Plan in line with the IAQM guidance to ensure any odour emissions generated by the development are appropriately managed to avoid unacceptable impacts on surrounding receptors. The OMP will be an operational document developed following a review of the potential odour sources and risk areas for odour release and would provide details of the operational and control measure appropriate to reduce or eliminate the generation of odours from the development. Officers propose a suitably worded condition.

#### *Conclusion on Air Quality*

378. The proposal has the potential to give rise to dust, odour and air quality impacts. With regards to dust and odour, Officers are satisfied that these can be mitigated through the imposition of suitably worded conditions and that the applicant has advanced both embedded mitigation and further mitigation measures to ensure that dust and odour emissions should not give rise to significant adverse effects both during the operational and construction phases. An Appropriate Assessment has been carried out by the CPA to assess the harm to the Thames Basin Heaths SPA (Whitmoor Common SSSI) from potential nitrogen deposition and critical loads, and based on the advice from Natural England, finds that the proposal meets the requirements of the Habitats Regulations with respect to the protection of European sites. Officers are satisfied that the proposal meets the requirements of the development plan, national planning policy and national regulations.

#### **Surface Water Drainage**

379. Paragraph 154 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. Paragraph 159 of the NPPF states that inappropriate development in areas at risk of

flooding should be avoided by directing development away from area at highest risk, but where development is necessary, making it safe without increased flood risk elsewhere.

380. Paragraph 167 of the NPPF further states that in determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Development should only be allowed in areas of flood where it can be demonstrated that the most vulnerable development is located in areas of lowest flood risk, it incorporates sustainable drainage systems (SuDS), the development is appropriately flood resilient.
381. Paragraph 169 of the NPPF refers to major developments and states that it should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The system should take account of advice from the Lead Local Flood Authority (LLFA); have appropriate minimum operational standards; have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development and where possible provide multifunctional benefits.
382. The National Policy Statement for Waste Water (2012) sets out that all proposals for projects located in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment (FRA) which should identify and assess the risks of all forms of flooding to the project and demonstrate how these risks will be managed, taking climate change into account.
383. Policy P4 of the GLPSS states that flood zones in the borough of Guildford are defined by the definitions contained within national planning practice guidance and the Council's Strategic Flood Risk Assessment. Development in areas of medium and high risk of flooding will be permitted provided that the provisions listed within the policy are met. The policy further states that development proposals in the 'developed' flood zone 3b will only be approved where there will be no increase in development vulnerability, with the exception of the provision of essential infrastructure. 'undeveloped' flood zone 3b will be safeguarded for flood management purposes.
384. Policy A24 of the GLPSS states that development areas in medium or high risk of flooding will be permitted provided that the provisions listed under Policy P4 are met.
385. Policy 14 of the SWLP states that planning permission for waste development will be granted where it can be demonstrated that it would not result in unacceptable impacts on communities and the environment including flood risk. This includes the impacts on, and opportunities to provide and enhance, flood storage and surface water drainage capacity.
386. The proposed development lies within the *River Wey* catchment, a designated main river. The Environment Agency Flood Map for planning defines the development site as falling within Flood Zone 1, with a small area in Flood Zone 2. The construction phase of the development also extends into Flood Zone 3, to facilitate construction of the outfall and transfer tunnel. The site is not currently served by a positive drainage system, with runoff partly infiltrating into the ground and partly draining overland to the *River Wey*.
387. The applicant has submitted an FRA in support of the application. The FRA identifies that the proposed development, where above ground built development will take place, lies within Flood Zone 1 and therefore there is a low risk of flooding. A small area of land on the north-eastern perimeter of the application site lies within Flood Zone 2. Whilst this area of land is within Flood Zone 2 no built development will occur in this area.
388. The FRA has concluded that the operational phase of the development would not present the potential to exacerbate fluvial flood risk. Some construction works such as the construction of the accesses and transfer tunnel will need to be carried out within or close to the designated flood zone areas.
389. To mitigate for any risk of construction exacerbating flood risk the FRA has identified a series of mitigation measures which are outlined within the Outline Environmental Management Plan (OEMP).

390. These provisions include, bunded delivery vehicle spill retention areas and storage tank bunds will be provided around the ferric dosing tanks and fuel tanks to ensure that the ground water is not contaminated.
391. The FRA has concluded that there is a low risk of flooding from tidal sources, sewers, groundwater and artificial sources to and arising from the development.
392. The ES has considered the impact the development would have on the water environment, including consideration of flood risk. The drainage strategy submitted as part of the application sets out that due to the historic landfilling at the application site, there will be no opportunities to implement sustainable urban drainage systems at the site. Therefore, surface water from the operational hardstanding areas within the application site will be collected within the site and returned to the sewage treatment works process to avoid any risks of offsite contamination.
393. The LLFA have reviewed the submitted FRA and ES and have raised no objections to the proposal. The LLFA is satisfied that the proposed drainage scheme meets the requirements set out in the NPPF. The LLFA have suggested the inclusion of planning conditions to ensure that the proposal is properly implemented and maintained throughout the lifetime of the development and to ensure that an increase in flood risk on or off the site does not occur.

### **Climate Change**

394. In 2020, Surrey County Council adopted the Surrey's Climate Change Strategy which adopted a target for achieving 'net zero' carbon emissions by 2050. Paragraph 154 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from Climate Change. When new development is brought forward in areas which are vulnerable, care must be taken to ensure that the risks can be managed through suitable adaptation measures and that the development can help to reduce greenhouse gas emissions through location, orientation and design.
395. Paragraph 157 states that in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supplies and take into account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
396. Policy D1 of the GLP requires all new development to be designed with regard to efficient use of natural resources including passive solar gain to maximise energy for heating and cooling.
397. Policy D2 of the GLP requires proposal for major development to set out how they have incorporated adaptations for a changing climate in order to avoid increased vulnerability and offer high levels of resilience to the full range of expected impacts. The policy strongly supports and encourages the development of low and zero carbon and decentralised energy, including (C)CHP distribution networks. The policy also states that new building must achieve a reasonable reduction in carbon emissions of a least 20 per cent measured against the relevant Target Emission Rate set out in Building Regulations 2010 (as amended) (Part L). The policy requires planning applications to include adequate information to demonstrate and quantify how proposals comply with the energy requirements. The Council has also produced The Climate Change, Sustainable Design, Construction and Energy SPD which provides further guidance for policy D2.
398. Chapter 13 of the ES includes a detailed assessment of the impact the development will have on climate change. The assessment focuses on the emissions of greenhouse gases (GHG) during the construction and operational stages of the development and the significance these emissions have on global warming.

- 399. The applicant, Thames Water, has set a Company-wide target to reduce GHG emissions to net zero by 2030. The company has also committed to purchasing electricity from 100% renewable sources.
- 400. The ES calculated the total net greenhouse gas emissions deriving from both the construction and operational phases of the proposed development and compares these to emissions against the existing STW during the same period and also against each five-year national carbon budget, set by the UK Government.
- 401. It is recognised that the proposal will generate greenhouse gases during both the construction and operational phases of the development.

*Construction Phase*

- 402. During the construction phases, the impact would be predominantly associated with embodied carbon within the construction materials, as well as construction vehicles and machinery. Where possible and practicable, the use of carbon intensive materials or processes will be reduced or avoided. Where it is not possible, material volumes or processes will be substituted with lower intensity replacements if achievable within the bounds of the design standards for safety and quality.
- 403. Imported earthworks are a large part of the overall construction GHG emission footprint, therefore opportunities to obtain earthworks on-site or near to the construction area will be maximised. Where it will not significantly alter the safety or characteristics of the site, earthwork fill will be reduced.
- 404. Local labour will be sourced in order to reduce the GHG emissions from construction workers travelling to and from the site and a construction workforce travel plan will be provided to the CPA for approval.

*Operational Phase*

- 405. In respect of operational emissions, the applicant has sought to reduce the emissions and has set a company-wide target to reduce emissions to net zero by 2030. All imported electricity is to be purchased from 100% renewable sources. The electricity purchased for the new STW will therefore be renewable electricity which is to be certified by the Renewable Energy Guarantees of Origin (REGO). Measures have also been incorporated within the design of the STW to increase the efficiency of plant equipment and reduce the overall energy usage.
- 406. In the operational phase there will be some impacts arising from staff vehicles and deliveries, however, the main impacts will be derived from the operation of the STW.

*Conclusion*

- 407. Overall, the new STW will result in a low increase in GHG emissions released into the atmosphere as a result of the construction operations. Once the STW are operational there will be a decrease in GHG emissions of approximately 22% when compared with the existing STW. The ES has concluded that the residual effects of the development's impact on the climate with the mitigation measures in place remains not significant.
- 408. The proposal is considered to comply with policies D1 and D2 of the GLP as well as the NPPF and SPD.

**HIGHWAYS AND ACCESS**

**Surrey Waste Local Plan 2020**

Policy 14: Protecting Communities and the Environment

Policy 15: Transport and Connectivity

**Guildford Local Plan: Strategy and Sites (2015-2034) (GLPSS)**

409. The section considers the traffic generation and access arrangements, the impact on the highway network and the accessibility of the site. The application is accompanied by a Transport Statement (TS), which identifies the likely traffic and transport impacts of the development during both the operational and construction phases.
410. Paragraph 111 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 112 of the NPPF sets out that applications for development should:-
- Give priority to pedestrians and cycle movements and facilitate access to high quality public transport;
  - Address needs of people with disabilities and reduced mobility;
  - Create places that are safe, secure and attractive;
  - Allow for efficient delivery of goods;
  - Be designed to enable charging or plug-in and other ultra-low emission vehicles
411. Paragraph 113 of the NPPF states that developments which will generate significant amounts of movement should provide a travel plan and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. The National Policy Statement for Waste Water (2012) identifies that, where appropriate, travel plans should be prepared and that a decision maker should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.
412. The National Planning Policy for Waste (2014) sets out that when determining waste applications, the likely impacts on the local environment and amenity should be considered against locational criteria including traffic and access.
413. Policy 15 of the SWLP supports 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 networks 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.
414. Policy ID3 of the GLPSS states that new development will be required to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of the sustainable transport. It also states that walking and cycling should be prioritised over vehicular traffic and a permeable layout should facilitate and encourage short distance trips. Point 6 of the policy states that new development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that make it acceptable, including the mitigation of its otherwise adverse material impacts. The mitigation will maintain the safe operation and the performance of the Local Strategic Road Networks.

415. The proposal forms part of the wider Slyfield Area Regeneration Project (SARP) which is allocated for redevelopment in the adopted Guildford Borough Council Local Plan (2019) (GLPSS). Policy A24 of the GLPSS identifies the SARP site as a site allocation for mixed-use development, including the relocation of the sewage treatment works to the north-east of the Slyfield industrial Estate. The existing sewage treatment works will be decommissioned to enable the development of approximately 1500 residential dwellings, forming part of the Weyside urban Village. The proposal must therefore be fully operational before the existing sewage treatment works can be demolished.
416. The proposed development will be accessed via two permanent vehicular access points at Westfield Road (eastern entrance) and North Moors Road (western entrance). For safety and security both vehicle entrances will have automated security gates. The gates will be set back into the site to ensure vehicles do not queue on the highway.
417. The connecting access roads have been incorporated into the designed to enable safe passage for pedestrians and cyclists travelling to and from the site. As part of the adjacent Weyside Urban Village development, bus stops will be located along Moorfield Road providing public transport options for staff and visitors attending the site.
418. A new pedestrian crossing at North Moors Road has been proposed to ensure adequate and safe pedestrian access. It is recommended that a planning condition is imposed to ensure that the off-site crossing is implemented and fully operational, prior to the occupation of the welfare building.
419. The applicant has stated that the internal road network will be surfaced with asphalt and bounded by precast concrete drainage kerbs or channels. The internal roads will have a minimum width of 3.65m (one way traffic) and 7.3m (two way traffic) with lay-by areas provided through-out the site to provide safe areas for delivery vehicles to park without blocking internal roads. The lay-by areas for chemical and fuel delivery will include bunds to enable contamination of any accidental spills.
420. On site cycle facilities, in accordance with the Surrey County Council's Vehicular and Cycle Parking Guidance (2018) will be provided. The cycling facilities will be located adjacent to the welfare building to ensure easy access.
421. A total of 26 parking spaces, including disabled parking bays, will be provided on site for staff and visitors. The parking provisions will include electric charging points.
422. A TS has been prepared by Jacobs UK Limited and submitted as part of the application.
423. The TS has carried out a study area for assessing the development traffic and transport impacts and includes the following roads:
- Westfield Road and Westfield Road extension (Slyfield Industrial Estate)
  - North Moors, Slyfield Industrial Estate
  - Moorfield Road, Slyfield Industrial Estate
  - Guildford Borough Depot Access Road (unnamed)
  - A320 Woking Road Corridor from Jacobs Well Road to the A3 slip roads

#### *Operational Phase*

424. The proposed STW will required 24 hour access for cess tankers and occasional emergency situations (sludge events). Vehicles will enter the site at the eastern entrance along the Westfield Road extension, and the western entrance on North Moors Road. The operational traffic would continue to use the Moorfield Road junction, which is currently being used at the existing STW site.
425. The submitted TS details that during the operational phase of the development the number of vehicles and HGV movements to and from the site is anticipated to be similar to those travelling to and from the existing STW, via Moorfield Road. Demonstrating that the future

operational phase of the proposed development would be broadly similar to the existing STW.

*Existing vehicle movements to and from the existing STW (access from Moorfield Road)*

426. The existing STW currently has 10 full-time permanent operational members of staff who travel to and from the site on a daily basis, resulting in 10 vehicle movements per day. Site maintenance regimes generate additional visitors to the site but these are fewer than the operational staff. Currently the staff and visitor numbers are estimated to be fewer than 25 movements per day.
427. The current HGV traffic movements to and from the existing site are estimated to be in the region of 40-100 on a weekday and fewer on weekends.

*Vehicle movements to and from the new STW (access from North Moors Road and Westfield Road)*

428. The predicted operational traffic for the proposed development is set out in section 8.1 of the TS. The new STW will be accessed at two locations, namely the eastern entrance at Westfield Road extension, and the western entrance on North Moors Road.
429. It is predicted that the average operational vehicle movements for the development between 07:00 and 23:00 would be 21 HGVs entering from North Moors Road and 13 HGVs entering from the Westfield Road extension. Due to the internal road layout on the site, most vehicles will exist the site via North Moors Road. The alternative routing via North Moors Road is not considered to have a significant impact on the internal road network of the wider Slyfield Industrial Estate.
430. Excluding emergency sludge events, the total average daily operational traffic would be approximately 72 vehicle trips in and out of the Moorfield Road junction, per day. This figure is estimated to be less than the current operation of the existing STW which is namely 100 trips a day.
431. The STW will require 24 hour access for cess tankers and during emergency situations (sludge events) sludge tankers could operate during night-time hours. Between the hours 23:00 and 07:00, it is estimated that 3 cess tankers will enter and exit the site. During the year 2020, approximately 45 sludge tankers were required to access the existing site between the hours of 23:00 and 07:00.
432. The TS further confirms that there would be no change in the number of full-time members of staff, at the new facility, and it is predicated that the average number of visitors will amount to 10 vehicles per day. The TS has demonstrated that the future operational phase of the development would be broadly similar to the operations at the existing STW. Furthermore, the operational traffic from the new development site would continue to use the same principal access routes, Moorfield Junction, that are currently being used at the existing STW. Therefore, the proposed development would not result in an increase in the number of vehicles movements on the wider highway network.
433. The existing STW serves a population equivalent of 99,200. The proposed development has been designed to allow for population growth within the Guildford Borough catchment. The proposal will allow for additional sewage capacity to be accommodated in accordance with the expected population growth in the area. Operating at capacity, in the future, the site is only likely to generate a further 12 movements (6 vehicles) per day.

*Construction Phase*

434. The TS has undertaken an assessment of the construction impacts and includes the construction programme, anticipated workforce numbers and predicted construction traffic which will be generated by the construction works.

435. The construction phase of the development will commence in the Autumn of 2022 and will last approximately 32 months, ending in January 2026.
436. The anticipated construction programme will comprise of 6 stages of work and these are set out below:-

<b>Construction stage</b>	<b>Anticipated Start date*</b>	<b>Anticipated End date*</b>
Site Establishment	September 2022	February 2023
Groundwork (including compaction)	November 2022	May 2023
Civil Work (including piling)	January 2023	February 2023
M&E Fit Out	November 2023	March 2025
Commissioning new STW	September 2024	January 2026
Tunnel Works	November 2022	March 2024

\*The anticipated timescales, provided by the applicant, may need to be amended.

437. It is anticipated that during the construction phases, as set out above, the proposed development is likely to generate a significant volume of traffic. The volume and mix of traffic associated with the construction phases will vary across the construction programme, which is likely to last for approximately 32 months.
438. The traffic flows during construction works include, vehicles used by construction workforce, HGV deliveries including supply of materials, equipment and Light Goods Vehicles (LGV). A delivery is equivalent to two one-way trips on the road network.
439. The construction workforce trip generator is based on a daily number of workers required for each of the construction activities. It is anticipated that during the peak construction period, projected to be in July 2023, the workforce demand would be approximately 207 workers.
440. The applicant has submitted a Work Force Management Plan (WFMP) detailing how traffic movement and parking on site will be accommodated, whilst minimising disruption to the highway network. This plan sets out the proposal for providing sufficient car parking provisions on site to ensure that on-street parking by operatives is prevented. The document also sets out that a mini-bus will be used to transport operatives around the site from the parking areas, and suggests alternatives for non-car travel. It is recommended that a planning condition be imposed to ensure that development complies with the submitted WFMP.
441. During the peak construction period, November 2022 to January 2023, a total of 180 HGV trips, 4 minibus shuttle services, 10 LGV (deliveries) and 148 car worker trips are anticipated per day. A combined total of 342 trips.
442. The construction traffic trips during the July 2023 peak for all traffic is estimated to be 68 HGV, 34 LGV (deliveries), 358 car worker trips and 16 minibus shuttle services. A combined total of 477 trips.
443. The trips, as outlined above, would be spread across the day to prevent disruption to highway network users. The applicant has agreed that no HGV movements will occur during the morning and afternoon peak periods, except during operations such as the pouring of concrete, where a constant supply is required.

444. No HGVs will be permitted to use Clay Lane/Jacobs Wells Road, Salt Box Road, Burdeshott Road and Whitmoor Lane. The routing restrictions and monitoring of the approved routes will be set out within the CTMP, which will be subject to a planning condition.
445. HGV movements, outside the four-month period, are estimated to be significantly lower for the remaining phases. The majority of construction works will require between 20-40 HGV movements per day, with a two-month period requiring a maximum of 68 movements per day. These movements will be distributed across the day and will avoid peak hours. The County Highway Officer (CHO) has concluded that the volume of HGV traffic is unlikely to have a significant impact on the operation of the highway network, particularly given the agreed restrictions to avoid peak hours. The restricted construction movements, agreed by the applicant, will be set out within the CTMP which is to be submitted and approved by the CPA prior to commencement of works.
446. The applicant is proposing that hours of working, during the construction phases, will be 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 Saturdays with no work on Sundays or bank holidays. The CHO has noted that the construction workforce is likely to arrive on site between 06:00-07:45 and depart between 17:45-19:15. A significant proportion of the workforce is anticipated to arrive outside of the peak network periods with a limited number departing during the peak afternoon periods. Therefore, the CHO considers that the predicted volume of traffic will not have a significant impact on highway network.
447. It is noted that the construction of the transfer tunnel will require continuous working below ground to reduce potential settlement and mitigate construction working risks. Construction works on the transfer tunnel shaft compound will therefore be necessary for 24 hours a day and 6 days a week (no working on Sundays) to support the continuous transfer tunnel construction. During works outside of normal working hours, construction activity will be limited to that necessary to support the continuous below ground construction to minimise as much disruption as possible. Where possible measures will be put in place to minimise disruption on the local road network.

#### *Access to the site during construction works*

448. The development will be accessed from Moorfield Road and North Moors Road. Construction traffic will access the site via these accesses allowing the vehicles to turn, park, manoeuvre, load and offload safely and to ensure that all vehicles enter and exit the site in a forward gear. Access to the transfer tunnel shaft construction site will be from Moorfield Road using existing access points. The construction of shaft E8 will be via the existing access to the Guildford Borough Council Woking Road depot.
449. No construction impacts are anticipated on the existing pedestrian and cycle routes within the Slyfield Industrial Estate. Measures will be identified in the Construction Transport Management Plan (CTMP) to manage any temporary conflicts between construction traffic and pedestrians using the public right of way, route 66.

#### *Impact on Surrounding Road Network*

450. As part of the Weyside Urban Village development, highway improvement works are proposed at the junctions of Moorfield Road and Woking Road (A320). These proposed works are considered necessary in order to improve the capacity of the existing junction. The highway improvement works are being delivered through a Section 278 Agreement (S278) and it is anticipated that the improvement works will commence in October 2022 and be completed by July 2023.
451. Given the scale and proximity of the adjacent construction operations including the highway improvement works to the Moorfield Road Junction, Weyside Urban Village Development and other associated works, the cumulative impact of these developments may cause a temporary inconvenience and delay to road users in the vicinity.

452. To further reduce the impact on the road network, the applicant has considered sourcing ready-mix concrete from a local facility, within the Slyfield Industrial Estate. If it is possible to source the concrete locally, delivery vehicles would not be required to travel through the Moorfield Junction, resulting in an overall reduction in construction traffic movements. However, at the time of writing this report it is unknown whether the concrete will be locally sourced.
453. The CHO has considered the impact on road users and despite the likelihood of disruption in the area, all reasonable measures have been put forward by the applicant to reduce construction traffic associated with the development.
454. Whilst there will be peaks in traffic movements, these are temporary and for large parts of the construction programme the number of movements are unlikely to have a significant impact. The benefits of the proposal are considered to outweigh the temporary disruption which would be caused to road users.

#### *Conclusion of Highway and Access*

455. The application site has been identified within the SWLP as an allocated site for waste development. The application site also forms part of the wider Slyfield Area Regeneration Project which is an allocated site within the GLPSS (policy A24) for mixed use development including the WUV development.
456. The proposed development is considered to have an acceptable impact on highway safety and the road network and would not result in an unacceptable impact on communities and/or the environment. The proposed development is considered to contribute to the delivery of an integrated and accessible transport system which maintains the safe operation of the local strategic road network. The proposal is therefore considered to be in accordance with policies 14 and 15 of the SWLP, policy ID3 of the GLPSS and the NPPF.
457. Whilst there is likely to cause disruption to users of the highway network during the construction phases, these disruptions will be temporary. The CHO has reviewed the TS and accompanying application documentation. The officer is satisfied that the operational phase of the proposal would not have an impact on the highway network and the development is considered to be acceptable. The CHO has raised no objections to the proposal, subject to the inclusion of planning conditions.

#### *Public Rights of Way*

458. There are no public rights of way (PROW) around where the proposed STW would be relocated to. PROW 438 runs northwards from North Moors towards Jacobs Well Road; and PROW 66 follows the *River Wey* navigation to the south of the existing STW before it splits with a south eastern branch crossing the *River Wey* to Stoke Lock and joining with route 49, and a northern branch that continues along the access road joining Slyfield Green before running north through the Industrial Estate.
459. There are no policies within the GLPSS or GLP with regards to rights of way. Policy 14 of the SWLP seeks to ensure that waste development proposals would not result in unacceptable impacts on communities using the rights of way network, including accessibility of open spaces.
460. The proposal does not seek to alter the PROW in the vicinity of the application site. As such, the impacts would be from the demolition phase of the existing STW and the construction phase of the replacement STW.
461. The Countryside Assess Officer (CAO) has been consulted and raised no objections to the proposed development. The CAO recommends a number of Informatives be imposed to ensure the safe protection of the PROW and that there are to be no obstructions on the PROW at any time. As such the proposed development is not considered to have an impact on the public rights of way identified above.

## Green Belt

### Surrey Waste Local Plan 2020

Policy 9: Green Belt

### Guildford Local Plan:

Policy P2: Green Belt

Policy A24: Slyfield Area Regeneration Project

### National Planning Policy Framework 2021 – paragraph 137, 138, 147 and 148

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462. Policy P2 of the GLPSS states that the Metropolitan Green Belt will continue to be protected against inappropriate development in accordance with the NPPF.
463. Paragraph 137 of the NPPF states that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt development is their openness.
464. Paragraph 138 identifies that Green Belt serves five purposes these being:
- To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;
  - To preserve the setting and special character of historic towns; and
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
465. Of the five purposes mentioned above, points a) to d) would not apply to this development. Point e) would apply to the development as it would enable urban regeneration by recycling the derelict landfill site.
466. Paragraph 147 of the NPPF further states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. This is also reflected in National Policy Statement for Waste Water (2012), Policy 9 of SWLP and Policy P2 of the GLP. Paragraph 148 further states that when considering any application, substantial weight should be given to any harm to the Green Belt and that very special circumstances will not exist unless potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
467. Paragraph 150 of the NPPF states that certain forms of development are not considered to be inappropriate in the Green Belt providing they preserve its openness and do not conflict with the purposes of including land within it. These include engineering operations.
468. The majority of the development at the new STW falls outside the Green Belt designation, however, a small part of the proposal includes a new final effluent and storm water overflow pipeline and an outfall structure which discharges into the *River Wey*. The two below ground pipelines follow a route across fields north and north-east leading to the *River Wey*. The land where the outfall structures and outfall pipes are situated, is within the designated Metropolitan Green Belt.
469. The outfall element of the development is considered to be an engineering operation necessary to construct major infrastructure. It is therefore not considered to be inappropriate development as defined by paragraph 147 of the NPPF, provided that the openness of the Green Belt is preserved and there is no conflict with the Green Belt purposes.
470. The construction of the outfall and storm overflow pipes would result in the removal of approximately 8m of scrub. These pipes would be constructed below ground. The only visible above ground structures, within the designated Green Belt, will be a retaining wall, set into the southern bank of the *River Wey* which will largely be below the water level of

the River, a 1.1m high fence will also be constructed around the top of the outfall structure, for safety purposes.

471. In accordance with Policy A24 of the GLP, additional landscape planting has been proposed along the northern boundary to reinforce the existing tree belt and to allow for the proposal to transition from urban to Green Belt development. Following the installation of the outfall and storm overflow pipes the land will be restored to ensure that the character of the area is reinstated and its openness preserved.
472. Chapter 9 of the ES: landscape and visual, refers to the harm that would be caused to the Green Belt. The ES states that during construction works there will be a localised and direct impact on the Green Belt. The ES further states that the harm is considered to have a low adverse impact but due to the high sensitivity of the Green Belt, the significance of the impact would be a moderate adverse effect, considered to have an effect on the openness of the Green Belt.
473. The effect on the openness of the Green Belt would be localised, temporary in nature and short term and once the construction works have been completed it would be largely reversed by the reinstatement of the land and the restoration of its character. The ES has concluded that during the operational phase of the development, the openness of the Green Belt would be preserved.
474. It is accepted that during the construction works there would be a temporary localised impact on the Green Belt, however, the openness of the Green Belt would be preserved.
475. Officers acknowledge that substantial weight is to be given to any harm to the Green Belt. The identified harm caused by the temporary construction works can be mitigated by planning conditions as well as the overall benefits of the proposal. Therefore on balance, the openness to the Green Belt would be preserved.

#### *Conclusion of Green Belt*

476. The proposed development within the Green Belt is considered to be an engineering operation necessary to facilitate the new STW. Officers acknowledge that there would be a temporary impact on the Green Belt, during construction works, however the openness of the Green Belt would be preserved.
477. Therefore, officers have concluded that the proposed outfall and overflow pipelines would preserve the openness of the Green Belt and would not conflict with the purposes of including land within it.
478. The proposal would preserve the openness of the Green Belt and as such would accord with paragraphs 147 and 150 of the NPPF, policy P2 of GLPSS, Policy A24 of GLP and policy 9 of SWLP.

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### ***Human Rights Implications***

479. 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.
480. It is recognised that the development has the potential to have an impact on the local environment and local amenity. Officers consider that these impacts can be addressed through the imposition of planning conditions and that the scale of any potential impacts are not sufficient to engage Article 8 or Article 1. As such the proposal is not considered to interfere with any Convention right.
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## Conclusion

481. The proposal involves the construction and operation of a new sewage treatment works and associated above and below ground infrastructure, including new final effluent and storm water outfall, and new transfer tunnel. An environmental assessment has been undertaken and an Environment Statement including updates and an addendum have been submitted with the application.
482. The application site lies adjacent to the *River Wey* and Godalming Conservation Area and heritage assets which are of significance. The County Historic Buildings Officer has assessed the application and stated that the proposal would lead to less than substantial harm (albeit on the lower end) to the significance of the designated heritage assets. The NPPF states that less than substantial harm should be weighed against the public benefits of the proposal.
483. The development is not located within any designated landscapes, however, it does lie within the RV5 Slyfield River Valley Floor landscape character area and RF7 Lower Wey River Floodplain landscape character area. The National Planning Policy for Waste sets out that when determining waste planning applications, the likely impact on the local environment and on amenity should be considered against locational criteria including landscape and visual impacts. Development plan policies seek to ensure that the proposal would not result in an unacceptable impact on communities and the environment including the landscape.
484. The application site is identified as an allocated site for waste management within the Surrey Waste Local Plan. The land also forms part of the Slyfield Area Regeneration Project (SARP) which is an allocated site, for redevelopment, within the adopted Guildford Borough Local Plan: Strategy and Sites.
485. The proposed development for a new STW will future proof wastewater treatment capacity to ensure that there is infrastructure resilience to cope with future population growth within the Guildford area. It will also enable the relocation of the STW to enable local housing needs to be met through the delivery of the Weyside Urban Village development.
486. The implications of the proposed development have been assessed in terms of impacts on the local environment and amenity. These include noise, dust, contamination, visual impact, ecology, biodiversity, stability, hydrology including the impact on ground water and flood risk, highway network and Rights of Way. Objections received from the technical consultees have been overcome through the inclusion of suitable planning conditions.
487. The proposal is located close to the River Wey and Godalming Conservation Area, with views of the proposal visible from this location. Officers recognise that the landscape character of the application site will be altered, as a result of the proposed development. In addition the construction works are likely to cause visual intrusion and disturbances to the tranquillity of the surrounding area, however, these would be temporary and short-term.
488. On balance the public benefits of the proposal including improved sewage treatment facilities for local residents and the delivery of the WUV development, as well as the mitigation measures proposed all weigh in favour of the proposal.
489. Officers are satisfied that the impacts of the development have been appropriately assessed within the ES and ES addendums. In overall conclusion, the ES finds that no likely significant effects and no unacceptable adverse impacts on the environment would arise from the proposed development. The ES considers that the potential benefits of the scheme are substantial, such that they clearly outweigh any minor impacts associated with the proposals.
490. Having regard to the environmental information contained within the Environment Statement, national and development plan policy, consultee views and concerns raised by local residents, officers consider subject to planning conditions, a Section 106 Agreement

and other controls and mitigation through other regulatory regimes, the development is consistent with the NPPF and the development plan policies.

***Recommendation***

The recommendation is subject to the prior completion of a Section 106 Legal Agreement to **PERMIT** subject to conditions and informatives set out below.

Conditions:

#### Commencement of Development

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the decision notice. The applicant shall notify the County Planning Authority in writing within seven working days of the commencement of development.

#### Plans and Drawings

2. The development hereby permitted shall be carried out in all respects in accordance with the following plans/drawings:  
J009-AJ-GUILS1ZZ-PLN-DR-E-10390 Rev P04 Illustrative Environmental Masterplan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10500 Rev P02 Site Location Plan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10501 Rev 03 Existing Site Layout Overview  
J009-AJ-GUILS1ZZ-PLN-DR-C-10502 Rev P03 Proposed Site Layout Overview  
J009-AJ-GUILS1ZZ-PLN-DR-C-10503 Rev P04 Proposed Outfall Pipeline Plan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10504 Rev P04 Outfall Pipeline Long Section  
J009-AJ-GUILS1ZZ-PLN-DR-C-10505 Rev P04 Outfall Structure  
J009-AJ-GUILS1ZZ-PLN-DR-C-10507 Rev P04 Transfer Tunnel Route, Shafts & Connections Key Plan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10508 Rev P03 Construction Worksite Key Plan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10509 Rev P03 Construction Worksite Sheet 1 of 3  
J009-AJ-GUILS1ZZ-PLN-DR-C-10510 Rev P03 Construction Worksite Sheet 2 of 3  
J009-AJ-GUILS1ZZ-PLN-DR-C-10511 Rev P03 Construction Worksite Sheet 3 of 3  
J009-AJ-GUILS1ZZ-PLN-DR-C-10512 Rev P03 Demolition Plan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10514 Rev P02 Transfer Tunnel Route Long Section  
J009-AJ-GUILS1ZZ-PLN-DR-C-10515 Rev P05 Shaft E8- General Arrangement and Sections with Connection to Existing Sewer  
J009-AJ-GUILS1ZZ-PLN-DR-C-10517 Rev P05 Shaft E6 – General Arrangement and Sections with Connection to Abbotswood Twin Syphons  
J009-AJ-GUILS1ZZ-PLN-DR-C-10518 Rev P05 Shaft E5 General Arrangement and Sections and Connection to Bowers Farm Rising Main  
J009-AJ-GUILS1ZZ-PLN-DR-C-10519 Rev P05 Shaft E4A General Arrangement and Sections  
J009-AJ-GUILS1ZZ-PLN-DR-C-10520 Rev P05 Shaft E4 General Arrangement and Sections  
J009-AJ-GUILS1ZZ-PLN-DR-C-10521 Rev P05 Shaft E3 General Arrangement and Sections and Connection to Burpham Main to Shaft E3  
J009-AJ-GUILS1ZZ-PLN-DR-C-10522 Rev P03 Existing Site Layout New STW  
J009-AJ-GUILS1ZZ-PLN-DR-C-10523 Rev P03 Proposed Site Layout STW  
J009-AJ-GUILS1ZZ-PLN-DR-C-10526 Rev P04 STW Drainage Plan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10527 Rev P03 Proposed Long Sections  
J009-AJ-GUILS1ZZ-PLN-DR-C-10528 Rev P03 Proposed Site Elevations  
J009-AJ-GUILS1ZZ-PLN-DR-C-10529 Rev P03 Inlet Pumping Station (Shaft E2) Plan and Elevations  
J009-AJ-GUILS1ZZ-PLN-DR-C-10538 Rev P04 Inlet Works Plan  
J009-AJ-GUILS1ZZ-PLN-DR-C-10539 Rev P04 Inlet Works Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10541 Rev P03 Primary Settlement Tanks  
Distribution Chamber Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10545 Rev P03 Primary Settlement Tanks Plan &  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10549 Rev P04 PST Sludge Pumping Station 1 Plan  
& Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10552 Rev P03 Pst Sludge Pumping Station 2 Plan  
& Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10555 Rev P03 Storm Tanks Plan and Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10561 Rev P03 Activated Sludge Plant Distribution  
Chamber Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10565 Rev P03 Activated Sludge Plant Plan &  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10566 Rev P03 Activated Sludge Plant Blowers Plan  
and Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10569 Rev P04 Final Settlement Tanks Distribution  
Chamber Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10573 Rev P03 Final Settlement Tanks Plan

J009-AJ-GUILS1ZZ-PLN-DR-C-10574 Rev P03 Final Settlement Tanks Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10576 Rev P03 RAS/SAS Pumping Station Plan and  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10579 Rev P03 Cloth Pile Filters Distribution  
Chamber Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10583 Rev P03 Cloth Pile Filters Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10590 Rev P03 Ferric Dosing Plant Plan and  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10594 Rev P03 Primary Scum Return Pumping  
Station Plan and Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10600 Rev P03 Primary Sludge & SAS Sludge  
Holding Tanks Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10608 Rev P03 Sludge Import Tank Plan and  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10612 Rev P03 Sludge Thickening & Dewatering  
Plant Plan and Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10616 Rev P03 Sludge Thickening and Blending  
Tanks Plan

J009-AJ-GUILS1ZZ-PLN-DR-C-10617 Rev P03 Sludge Thickening and Blending  
Tanks Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10620 Rev P03 Sludge Liquor Balancing Tank Plan  
and Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10629 Rev P04 Welfare Building Roof Plan and  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10630 Rev P03 Welfare Building Floor Plans

J009-AJ-GUILS1ZZ-PLN-DR-C-10632 Rev P03 Fuel Storage Tanks Plan &  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10635 Rev P03 Odour Control Plant 1 – Inlet Works/  
PSTS Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10638 Rev P03 Odour Control Plant 2 – Sludge  
Treatment Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10641 Rev P03 Potable Water Booster Set Plan and  
Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10644 Rev P03 MCC1 and Sub-station – Inlet Works  
Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10647 Rev P03 MCC2 and Sub-station – PST & TT  
Plan & Elevations

J009-AJ-GUILS1ZZ-PLN-DR-C-10650 Rev P03 MCC3 and Sub-station – ASP Plan & Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10653 Rev P03 MCC4 and Sub-station – sludge Treatment Plan & Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10656 Rev P03 MCC5 – FST Plan & Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10659 Rev P03 Sludge Cake Storage Silo/Hopper Plan & Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10663 Rev P03 Main Electrical Intake Substation Plan & Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10666 Rev P03 Standby Generators Plan & Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10673 Rev P02 East Surface Water Pumping Station Plan and Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10674 Rev P02 West Surface Water Pumping Station Plan and Elevations  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10694 Rev P02 UKPN Compound Access Junction Layout  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10695 Rev P03 Eastern Access Junction Layout  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10696 Rev P04 Western Access Junction Layout  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10697-Rev P03 Western Access North Moors Pedestrian Crossing dated 18 July 2022  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10700 Rev P03 Western Access Gate Details  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10701 Rev P03 Eastern Access Gate Details  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10702 Rev P03 Fencing Standard Details  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10703 Rev P02 Shaft E2 – Inlet Pumping Station General Arrangement and Sections  
 J009-AJ-GUILS1ZZ-PLN-DR-C-10704 Rev P02 Proposed Sections and Elevations Location Plan  
 J009-AJ-GUILS1ZZ-PLN-DR-C 10705 Rev P03 Proposed Long Sections with Trees

#### Colours and Materials

3. The colours and materials for the buildings and structures shall accord with those set out in the Schedule of Buildings and Structures dated 19 May 2022.

#### Normal Construction Working Hours

4. With the exception of the below ground activities associated with the construction of the transfer tunnel, construction of the development hereby permitted shall take place only during the following hours:-
  - 0700 to 1900 hours Monday to Friday
  - 0700 to 1300 hours Saturdays

There shall be no construction works on Sundays, Public, National or Bank Holidays.

All below ground construction works associated with the construction of the transfer tunnel shall not take place on Sundays, Public, National or Bank Holidays. All stockpiling of construction materials necessary to support the transfer tunnel construction, export of excavated material from the transfer tunnel construction worksites and heavy goods vehicle movements associated with the transfer tunnel construction shall be limited to the construction hours in this condition.

The only exception to these hours shall be in emergencies to maintain safe construction activities, or where necessary to maintain services to Thames Water Customers, which shall be notified to the County Planning Authority as soon as practicable.

#### Construction Deliveries

5. No deliveries or export of construction and demolition materials, with the exception of importing granular capping and fill material, delivery of pre-cast concrete piles and concrete lorries, shall be taken at or dispatched from the application site outside the following times:

07:00 – 07:30 and 08:30 – 16:30 and 17:30 – 1900 hours Monday to Friday

07:00 – 13:00 Saturdays.

No goods vehicles shall enter or leave the site on Sundays, Bank, Public or National Holidays.

#### Construction Traffic Management Plan

6. No development, other than site security fencing/hoarding, site signage, site clearance, vegetation clearance, utility diversions, monitoring equipment, and hardstanding at tunnel shaft construction sites, shall take place until a Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the County Planning Authority.

The CTMP shall include the following details:

- Loading and unloading of plant and materials;
- Programme of works;
- HGV deliveries and hours of operation;
- Vehicle routing;
- Measures to prevent the deposit of materials on the highway;
- On-site turning for construction vehicles, and
- Site accesses and access roads.

Construction of the development shall be carried out in accordance with the approved details.

#### Construction Workforce Travel Plan

7. No development, other than site security fencing/hoarding, site signage, site clearance, vegetation clearance, utility diversions, monitoring equipment, and hardstanding at tunnel shaft construction sites, shall take place until a Construction Workforce Travel Plan (CWTP) has been submitted to, and approved in writing by, the County Planning Authority and thereafter implemented and adhered to during construction of the development.

#### North Moors Pedestrian Crossing

8. Prior to the occupation of the welfare building at the new sewage treatment works, the pedestrian crossing and planting on North Moors, as shown on drawing J009-AJ-GUILS1ZZ-PLN-DR-C-10697\_P01 Western Access Pedestrian Access

Improvements, shall be constructed (the pedestrian crossing) and carried out (planting) in accordance with the approved drawings.

#### Vehicle and Bicycle Parking

- 8
9. Prior to the start of commissioning of the development vehicle parking and bicycle spaces shall be laid out in accordance with the approved drawing J009-AJ-GUILS1ZZ-PLN-DR-C-10523 P03 Proposed site Layout and thereafter retained.

#### Electric Vehicle Parking

10. Prior to the start of commissioning of the development at least 20% of the available parking spaces are 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) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

#### Archaeology

11. Prior to the start of commissioning of the development at least 20% of the available parking spaces are 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) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

#### Construction Environmental Management Plan

12. No development, other than site security fencing/hoarding/ gates, site signage, monitoring equipment, temporary site accesses, temporary access roads and hardstanding at tunnel shaft construction sites, and temporary car parking at the existing STW, shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the County Planning Authority. The CEMP shall include details of the following relevant measures:
  - a) Dust mitigation measures including control and management of airborne asbestos from groundworks
  - b) Air quality management measures
  - c) Noise management and mitigation
  - d) Vibration management and mitigation
  - e) Construction odour management plan
  - f) Pollution control and prevention measures, particularly to minimise mobilisation of contaminated materials including silt, and pollution reporting processes and staff training
  - g) Construction lighting management measures
  - h) Discovery Plan (in the event of discovery during the works of contamination not previously identified)
  - i) Details of management responsibilities including complaint recording and management

- j) Contact details for residents to contact
- k) Outline programme for the works
- l) Outline construction methods
- m) Measures to be used to minimise impacts of the works on biodiversity (considering both potential disturbance and pollution) including any necessary mitigation for protected species, and a map or plan showing habitat areas to be specifically protected during the works
- n) Measures that will be used to prevent the spread of any non-native invasive species identified
- o) the Project Ecologist and/or Ecological Clerk of Works responsible for particular activities associated with the CEMP.

The development shall be carried out in accordance with the details and measures approved in the CEMP.

#### Previously Unidentified Contamination

13. If, during development, contamination not previously identified is found to be present at the site then no further development on the affected part of the application site shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the County Planning Authority. The remediation strategy shall include:
- i) A survey of the extent, scale and nature of the contamination
  - ii) An assessment of the potential risks to previously identified receptors; and
  - iii) Details of remedial and mitigation options and the proposed remediation strategy in accordance with the then current version of Land contamination risk management (LCRM) – gov.uk ([www.gov.uk](http://www.gov.uk))
  - iv) The scope of works to be undertaken, timetable of works, objectives, site management procedures, remediation criteria and a verification plan.

The remediation strategy shall be implemented as approved.

#### Construction Noise and Vibration

14. Noise levels from construction works during construction working hours specified in Condition 4 shall not exceed the levels in Table E.1 of British Standard 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise' for a period of 10 or more days of working in any 15 consecutive days or for a total number of days exceeding 40 in any 6 consecutive months. Noise generating works shall not take place outside of the hours permitted in Condition 4 without prior consent from the Country Planning Authority.
15. Vibration levels from demolition and construction works shall not exceed the levels in Table B.1 of British Standard (BS) 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Part 2: Vibration (1.0mm/s at sensitive receptors) for a period of 10 or more days of working in any 15 consecutive days or for a total number of days exceeding 40 in any 6 consecutive months, without prior consent from the Country Planning Authority. Vibration generating works shall not take place outside of the hours permitted in Condition 4 without prior consent from the Country Planning Authority. Vibration levels shall not exceed the levels

identified in Table B.2 of BS 5228-2:2009+A1:2014 at any time at any existing buildings.

16. No development, other than site security fencing/hoarding, site signage, site clearance, vegetation clearance, utility diversions, monitoring equipment, temporary site accesses, temporary access roads and hardstanding at tunnel shaft construction sites, temporary car parking at the existing sewage treatment works shall commence until a Construction Noise and Vibration Management and Monitoring Plan (CNVMP) for the development has been submitted to, and is approved in writing by, the County Planning Authority.

The CNVMP shall take into account the noise limits set in Conditions 14 and 15. The CNVMP should include (but not be limited to) noise/vibration limits at noise sensitive receptors, mitigation measures, noise and vibration monitoring procedure and complaints procedure. The CNVMP should include details of any proposed noise and vibration monitoring during night-time and other working periods outside normal construction working hours as set in Condition 4).

17. At the request of the County Planning Authority following complaints, noise and/or vibration monitoring shall be undertaken at representative noise and vibration sensitive receptors located adjacent to the application site or calculated from measurements taken at the site boundary. The scope of this monitoring (including but not limited to locations, duration, methodology, noise limits) should be agreed in advance with the County Planning Authority (CPA) before being undertaken. The results of the monitoring shall be reported to the CPA within 14 days of the monitoring taking place. Measurements should only be undertaken by those competent to do so. Should the site fail to comply with the limits set in Conditions 14, and 15 or any limits in the approved CNVMP, the Applicant shall submit a scheme for approval in writing by the CPA to attenuate levels to the required level which shall be implemented within 48 hours, or the source shall cease until the scheme is in place.

#### Operational Noise Limits

18. The Rating Level,  $L_{Ar,Tr}$ , of the noise emitted from all plant, equipment and machinery, including on site vehicle movements, associated with the application site shall not exceed the existing representative  $LA_{90}$  background sound level at any time by more than +5 dB(A) at the nearest noise sensitive receptor. This will be demonstrated by a noise monitoring report submitted within 12 months of the start of commissioning the development.

Any assessment shall be carried out in accordance with British Standard (BS) 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.

The existing representative  $LA_{90}$  background sound level shall be determined by measurement that shall be sufficient to characterise the environment. The representative level should be justified following guidance contained within BS 4142:2014+A1:2019 and agreed with the County Planning Authority (CPA).

Should the site fail to comply with the noise limits, the applicant shall submit a scheme for approval in writing by the CPA to attenuate noise levels to the required

level which shall be implemented within 7 days of the CPA issuing approval for the scheme, or such other period as agreed in writing by the County Planning Authority.

In the case of emergency operations or activities that require the use of plant or machinery at night that are likely to exceed the noise limits specified in this condition, the County Planning Authority shall be notified 5 working days in advance, or as soon as reasonably possible after the event.

#### Construction Surface Water and Wastewater Management Plan

19. No development, other than site security fencing/hoarding, site signage, site clearance, vegetation clearance, utility diversions, monitoring equipment, temporary site accesses, temporary access roads and hardstanding at tunnel shaft construction sites, temporary car parking at the existing STW, shall commence until a Construction Surface Water and Wastewater Management Plan, including a scheme to treat and remove suspended solids from surface water run-off during construction works has been submitted to, and approved in writing by, the County Planning Authority. The plan shall be implemented as approved.

#### Gas and Groundwater Management Plan

20. No development or site preparation works other than site security fencing/ hoarding/ gates, site signage, monitoring equipment, temporary site accesses, temporary access roads and hardstanding at tunnel shaft construction sites and temporary car parking at the existing sewage treatment works shall commence until a Gas and Groundwater Management Plan, which will include Gas and Groundwater Monitoring Plan, Borehole Management Plan (including replacement and decommissioning measures) and Gas and Groundwater Contingency Action Plan, for both construction and operational phases, have been submitted to, and approved in writing by, the County Planning Authority. The Plans shall include a timetable of monitoring, activity based trigger and control levels, timetable for periodic reviews and provision of reports to the County Planning Authority.

The Monitoring Plan shall be informed by sufficient and robust data. The gas monitoring data shall be collected in accordance with the guidance given in BS 8576 and assessed in accordance with guidance given in BS 8485.

Reports as specified in the approved plans, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the County Planning Authority.

#### Site Waste Management Plan

21. No development, other than site security fencing/hoarding, site signage, site clearance, vegetation clearance, utility diversions, monitoring equipment, temporary site accesses, temporary access roads and hardstanding at tunnel shaft construction sites, temporary car parking at the existing STW, shall commence until a Site Waste Management Plan has been submitted to, and approved in writing by, the County Planning Authority.  
Soil Management and Conservation Plan

22. No soil handling operations (including trafficking over in situ soils during wet ground conditions) shall commence until a Soil Management and Conservation Plan (SMCP) has been submitted to, and approved in writing by, the County Planning Authority. The SMCP shall include details of a soil resource survey and what soil handling practices will be undertaken in accordance with the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (DEFRA 2009).

#### Remediation Strategy

23. No development other than site security fencing/hoarding/gates, site signage, monitoring equipment, temporary site accesses, temporary access roads and hardstanding at tunnel shaft construction sites, and temporary car parking at the existing Sewage Treatment Works shall commence until a detailed remediation strategy to bring the site to a condition suitable for the intended use and deal with the risks associated with contamination of the site in respect of the development hereby permitted has been prepared and approved in writing of the County Planning Authority.

The detailed remediation strategy shall include (but not be limited to) the results of the completed site investigations, a detailed risk assessment and options appraisal and remediation strategy including objectives and remediation criteria, full details of the works to be undertaken and how they are to be undertaken, outline details of the proposed gas protection measures in all structures, reference to appropriate standards, outline programme of works and site management procedures including corrective and contingency actions.

The detailed remediation strategy shall be prepared by competent persons and in accordance with the Environment Agency's "Land Contamination: Risk Management" guidance. The detailed remediation scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

The detailed remediation strategy shall include (but not be limited to) a verification plan setting out details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy above are complete and arrangements for contingency action. The verification plan shall refer to the appropriate standards adopted and define the competency of the person responsible for verification.

The County Planning Authority shall be notified in writing of the intended commencement of remediation works no less than 14 days before the works commence on-Site. The scheme and its verification plan shall be implemented as approved.

24. Prior to the construction of each structure (excluding piling), details and drawings of the proposed gas protection measures shall be submitted and approved in writing by the County Planning Authority. The gas protection measures shall be implemented as approved.
25. Within six (6) months from the date of commencement of commissioning, a Remediation Strategy - Verification Report demonstrating the completion of works set

out in the Remediation Strategy as approved pursuant to Condition 23 and the effectiveness of the remediation shall be submitted for approval in writing by the County Planning Authority.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

The Remediation Strategy - Verification Report shall also identify any requirement for longer-term monitoring of contaminant linkages, maintenance (including the monitoring of the long-term effectiveness of the proposed remediation), and arrangements for contingency action and present a scheme for implementation. The monitoring and maintenance scheme shall be submitted to and approved in writing by the County Planning Authority.

Any actions / ongoing measures shall be submitted within an agreed timescale with the County Planning Authority. Following completion of the actions/measures identified in the approved remediation scheme a further report which demonstrates the effectiveness of the monitoring and maintenance measures shall be submitted to and approved by the County Planning Authority.

Piling, Earthworks and Construction Risk Assessment, Mitigation, Management and Verification Plan

- 26. Other than transfer tunnel and shaft construction works outside the main sewage treatment works site, no earthworks, excavations, ground improvement and compaction work or piling and foundation construction works shall commence until a Piling, Earthworks and Foundations Construction Risk Assessment, Mitigation and Management Plan and Verification Plan, has been submitted to, and approved in writing by, the County Planning Authority. The Risk Assessment and Management Plan shall demonstrate that Land Stability and Settlement and any risk to controlled waters is managed within acceptable and clearly defined limits.

The development shall be carried out in accordance with the approved details and verification plan.

- 27. Prior to commencing sewage treatment operations at the sewage treatment works site other than equipment and process trials, the Earthworks and Foundations Construction Risk Assessment, Mitigation and Management Plan Verification Report shall be submitted to, and approved in writing, by the County Planning Authority.

Settlement Monitoring Plan (Landfill Rapid Impact Compaction)

- 28. No ground improvement or import of capping, cover or general earthworks makeup material at the new sewage treatment works site shall commence until a Settlement Monitoring Plan for Landfill Rapid Impact Compaction (SMPLRIC) (or any other ground improvement method or methods use in combination) has been submitted to, and approved in writing by, the County Planning Authority.

The SMPLRIC shall include details of:

- a) Outline of construction methods to be used for ground improvement
- b) Impact assessment
- c) Monitoring of the settlement achieved by compaction

- d) A comparison with predicted settlement
- e) The trials and triggers for additional treatment should it be required
- f) Recovery/ action plan following a trigger event.
- g) Post compaction monitoring and long-term monitoring requirement

To demonstrate that the rapid impact compaction treatment has addressed land stability matters. The SMPLRIC shall be implemented in accordance with the approved details.

#### Settlement Monitoring Plan (Tunnel and Shafts)

29. No below ground tunnel or shaft construction shall commence until a Settlement Monitoring Plan for Tunnel and Shafts Construction has been submitted to, and approved in writing by, the County Planning Authority.

The Settlement Monitoring Plan should include, inter alia,

- The outcome of the Contractor review recommended in the Jacobs Phase 1 Transfer Tunnel Settlement Risk Assessment Report Revision B dated 3rd December 2021
- Actions arising from the conclusions of the Phase 1 Assessment based on the Contractor's interpretation of the available information and the precise methods of constriction and any additional assessments made (i.e., Phase 2, Phase 3) by the Contractor
- Presentation of detailed proposals for the monitoring that will be undertaken, and proposals for continuous review of the data setting trigger and action levels for the magnitudes of movement for the various sensitive receptors,
- A contingency plan and Emergency Action Plan
- Verification plan and final Monitoring Report to demonstrate that third party property has not been affected by shaft and tunnel construction.

The Settlement Monitoring Plan for Tunnel and Shaft Construction shall be carried out in accordance with the approved details.

#### Dewatering Scheme

30. No dewatering of the ground around the transfer tunnel and shafts elements of the development shall be carried out on site until a Dewatering Scheme has been submitted to, and approved in writing by, the County Planning Authority. Dewatering shall only take place in accordance with the details as approved.

#### Surface Water Drainage

31. Prior to the installation of any part of the operational surface water drainage system an Operational Drainage Strategy and Detailed Operational Surface Water Drainage Design shall be submitted to, and approved in writing by, the County Planning Authority. The development shall be carried out in accordance with the approved details unless otherwise agreed in writing.

The strategy and design shall include:

- a) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events. The final solution should follow the principles set out in the approved drainage strategy.
- b) 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 each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- c) Details of works in the vicinity of any watercourse.

- The drainage scheme shall be implemented in accordance with the approved details.
32. Prior to the commissioning of the development an Operational Surface Water Drainage Maintenance and Management Plan, including responsibilities, shall be submitted to, and approved in writing by, the County Planning Authority. The Plan shall be carried out in accordance with the details as approved.
33. Prior to the development commencing full operation, a Surface Water Drainage - Verification Report demonstrating the completion of works set out in the approved Detailed Surface Water Drainage Design shall be submitted to, and approved in writing, by the County Planning Authority.

#### Odour Management Plan

34. Prior to the commissioning of the development an Odour Management Plan shall be submitted to, and approved in writing by, the County Planning Authority. The operation of the STW shall be carried out in accordance with the details as approved.

#### Environmental Masterplan

35. The planting as shown on drawing J009-AJ-GUILS1ZZ-PLN-DR-E-10390 Rev P04 Illustrative Environmental Masterplan dated 18 May 2022 shall take place during the first available planting season following the commencing of full operation of the sewage treatment works. All maintenance and management of the woodland planting shall be undertaken in accordance with the details shown and prescribed on drawing number drawing J009-AJ-GUILS1ZZ-PLN-DR-E-10390 Rev P04 the duration of the development.

#### Habitat and Landscape Management Plan

36. The Habitat and Landscape Management Plan (Appendix 10.14 of the Environmental Statement) shall be implemented as set out in the Habitat and Landscape Management Plan, with initial planting being undertaken in the first planting season following start of commissioning, or within 12 months of the start of commissioning.
37. In the fifth year after completion of landscape planting, a review of the success of the landscape planting as set out on the Environmental Masterplan (drawing number J009-AJ-GUILS1ZZ-PLN-DR-E-10390\_P04) and the Habitat and Landscape Management Plan Appendix (10.14 of the Environmental Statement) undertaken. A Landscape and Habitat Review Report, setting out requirements for additional

planting or revised management actions shall be submitted to, and approved in writing, by the County Planning Authority. The requirements set out in the Landscape and Habitat Review Report shall be carried out in accordance with the details as approved.

#### Trees

- 8
38. With the exception of the trees identified in Condition 39, no trees, hedgerows or shrubs within the curtilage of the site, except those identified on the approved drawings J009-AJ-GUILS1ZZ-SGR-DR-Z-10367 rev P02 Figure 2 Tree Removal Plan Page 1 of 4 dated 19 October 2021, J009-AJ-GUILS1ZZ-SGR-DR-Z-10367 rev P02 Figure 2 Tree Removal Plan Page 2 of 4 dated 19 October 2021, J009-AJ-GUILS1ZZ-SGR-DR-Z-10367 rev P02 Figure 2 Tree Removal Plan Page 3 of 4 dated 19 October 2021 and J009-AJ-GUILS1ZZ-SGR-DR-Z-10367 rev P02 Figure 2 Tree Removal Plan Page 4 of 4 dated 19 October 2021 or otherwise clearly indicated in any supporting documents as being removed or subject to arboricultural works, shall be felled, lopped or pruned nor their roots removed or pruned during the carrying out of the development, or until the completion of the development hereby permitted.
39. Prior to the commencement of development hereby permitted, details of:
- i. tree retention and protection measures for trees T220, T223, and G401 as shown on drawing J009-AJ-GUILS1ZZ-SGR-DR-Z-10367 rev P02 Figure 2 Tree Removal Plan Page 4 of 4 dated 19 October 2021 shall be submitted to and approved in writing by the County Planning Authority and
  - ii. an investigation of options, for tree retention and protection measures for trees T221 and G402;
- shall be submitted to and approved in writing by the County Planning Authority. The tree protection measures shall be implemented in accordance with the details as approved.

If, following investigation of trees T221 and G402 that these trees can be retained or the group partially retained, tree protection measures in accordance with (a) above shall then be installed prior to the commencement of use of the construction worker car park. All approved tree protection measures shall remain in place for the duration of the construction phase. There shall be no storage of materials (including soils) and no ground disturbance within any approved construction exclusion zones.

40. Prior to the commencement of any above ground works to install the transfer tunnel vent stacks, details of the colour of the vent stacks as shown on drawings J009-AJ-GUILS1ZZ-PLN-DR-C-10515 P05 Shaft E8- General Arrangement and Sections with Connection to Existing Sewer, J009-AJ-GUILS1ZZ-PLN-DR-C-10517 Rev P05 Shaft E6 – General Arrangement and Sections with Connection to Abbotswood Twin Syphons, J009-AJ-GUILS1ZZ-PLN-DR-C-10518 Rev P05 Shaft E5 General Arrangement and Sections and Connection to Bowers Farm Rising Main, J009-AJ-GUILS1ZZ-PLN-DR-C-10519 Rev P05 Shaft E4A General Arrangement and Sections, J009-AJ-GUILS1ZZ-PLN-DR-C-10520 Rev P05 Shaft E4 General Arrangement and Sections, J009-AJ-GUILS1ZZ-PLN-DR-C-10521 Rev P05 Shaft E3 General Arrangement and Sections and Connection to Burpham Main to Shaft E3 shall be submitted to and approved in writing by the County Planning Authority. The vent stacks shall be installed/ constructed strictly in accordance with the approved details.

## Lighting

41. Prior to the installation of any operational lighting at the new sewage treatment works, a Detailed Lighting Scheme and Lighting Impact Assessment, based on the viewpoints used to inform the Landscape and Visual Impact Assessment shall be submitted to, and approved in writing by, the County Planning Authority.

The Detailed Lighting Scheme shall include as a minimum:

- (1) A Layout Plan showing the location of all lighting and lighting columns, and the type and details of lighting equipment used.
- (2) An isolux contour map showing the light spillage to 1 lux both vertically and horizontally to include the adjacent woodland and River Wey floodplain.
- (3) Details of measures to avoid glare.
- (4) A report setting out the measures that have been taken to minimise the impact on wildlife and to avoid light spillage on the woodland to the north and east demonstrating how the lighting scheme is the minimum required to be undertake the required task.

The Detailed Lighting Scheme shall be carried out in accordance with the details as approved.

### Reasons:

1. To comply with Section 91 (1)(a) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.
2. To ensure the permission is implemented in accordance with the terms of the application and to enable the County Planning Authority to exercise planning control over the development pursuant to Surrey Waste Plan 2020 Policy 14, Guildford Local Plan: Strategy and Sites (2015-2034) Policies P4, D3 and ID3 and Guildford Borough Local Plan (2003) Saved Policies Policies G1, HE4, HE7, HE10, NE4, NE5 and NE6.
3. 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 pursuant to Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan (2003) Saved Policies Policy G1.
4. To protect the amenities of the occupiers of nearby properties during the construction period in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan (2003) Saved Policies Policy G1.
5. To protect the amenities of the occupiers of nearby properties during the construction period in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan (2003) Saved Policies Policy G1.
6. To ensure that construction works can be carried out safely in order that the development does not prejudice highway safety nor cause inconvenience to other highway users in accordance with Surrey Waste Plan 2020 Policy 15.

7. To promote sustainable modes of transport in accordance with Guildford Local Plan: Strategy and Sites (2015-2034) Policy ID3: Sustainable Transport for new development.
8. To promote sustainable modes of transport in accordance with Guildford Local Plan: Strategy and Sites (2015-2034) Policy ID3: Sustainable Transport for new development.
9. To promote sustainable modes of transport in accordance with Guildford Local Plan: Strategy and Sites (2015-2034) Policy ID3: Sustainable Transport for new development.
10. To promote sustainable modes of transport in accordance with Guildford Local Plan: Strategy and Sites (2015-2034) Policy ID3: Sustainable Transport for new development.
11. To afford the County Planning Authority a reasonable opportunity to examine the outcomes of Palaeoenvironmental Assessment and Dating Report and decide on any action required in accordance with the Surrey Waste Plan 2020 Policy 14.
12. To prevent pollution to the environment, to protect species of conservation concern, to ensure proper waste management; and to protect residential amenity in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan 2003 Saved Policy G1.
13. To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to works, neighbours and other offsite receptors in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan 2003 Saved Policy G1.
14. To ensure the minimum disturbance and avoid nuisance to the locality to comply with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan 2003 Saved Policy G1.
15. To ensure the minimum disturbance and avoid nuisance to the locality to comply with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan 2003 Saved Policy G1.
16. To ensure the minimum disturbance and avoid nuisance to the locality to comply with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan 2003 Saved Policy G1.
17. To ensure the minimum disturbance and avoid nuisance to the locality to comply with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan 2003 Saved Policy G1.

18. To ensure the minimum disturbance and avoid nuisance to the locality to comply with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan 2003 Saved Policy G1.
19. To prevent pollution of the water environment in accordance with Surrey Waste Plan 2020 Policy 14, Guildford Local Plan 2019 Policies P4, ID4 and Guildford Local Plan 2003 Saved Policy G1.
20. To prevent pollution of the water environment and protect surrounding receptors pursuant to Surrey Waste Plan 2020 Policy 14, Guildford Local Plan 2019 Policies P4 and ID4 and Guildford Local Plan 2003 Saved Policy G1.
21. To maximise the amount of waste reused, recycled and diverted from landfill consistent with the waste hierarchy pursuant to Surrey Waste Plan 2020 Policies 4 and 14 and Guildford Local Plan 2019 Policy D2.
22. To minimise impacts on soil quality and resources pursuant to Surrey Waste Plan 2020 Policy 14.
23. To prevent pollution of the water environment and to protect surrounding receptors pursuant to Surrey Waste Plan 2020 Policy 14, Guildford Local Plan 2019 Policies P4 and ID4 and Guildford Local Plan 2003 Saved Policy G1.
24. To protect surrounding receptors pursuant to Surrey Waste Plan 2020 Policy 14, Guildford Local Plan 2019 Policies P4 and ID4 and Guildford Local Plan 2003 Saved Policy G1.
25. To prevent pollution of the water environment and to protect surrounding receptors pursuant to Surrey Waste Plan 2020 Policy 14, Guildford Local Plan 2019 Policies P4 and ID4 and Guildford Local Plan 2003 Saved Policy G1.
26. To ensure the protection of human health, local property and associated infrastructure and the wider environment in accordance with Surrey Waste Plan 2020 Policy 14.
27. To ensure the protection of human health, local property and associated infrastructure and the wider environment in accordance with Surrey Waste Plan 2020 Policy 14.
28. To ensure the protection of human health, local property and associated infrastructure and the wider environment in accordance with Surrey Waste Plan 2020 Policy 14.
29. To comply with the terms of the application and to enable the County Planning Authority to exercise planning control over the operation in the interests of local amenities and the environment in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan (2003) Saved Policies Policy G1.

30. To maintain planning control over the development hereby permitted in accordance with Surrey Waste Plan 2020 Policy 14.
31. To ensure the design meets the technical standards for SuDS, does not increase flood risk on or off site and is suitably maintained throughout its lifetime in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Local Plan: Strategy and Sites (2015-2034) Policy P4.
32. To ensure the design meets the technical standards for SuDS, does not increase flood risk on or off site and is suitably maintained throughout its lifetime in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Local Plan: Strategy and Sites (2015-2034) Policy P4.
33. To ensure the Sustainable Drainage System is designed to the technical standards and does not increase flood risk on or off site and is suitably maintained throughout its lifetime in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Local Plan: Strategy and Sites (2015-2034) Policy P4.
34. In the interests of local amenity, the environment and/ or human health pursuant to Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan (2003) Saved Policies Policy G1.
35. To safeguarding the existing landscape features and ensure their contribution to the character of development and the character of the local area in accordance with Surrey Waste Plan 2020 Policy14 and Guildford Borough Local Plan (2003) Saved Policies G1 and NE5; and Guildford Local Plan: Strategy and Sites (2015-2034) Policy ID4.
36. To safeguarding the existing landscape features and ensure their contribution to the character of development and the character of the local area in accordance with Surrey Waste Plan 2020 Policy14 and Guildford Borough Local Plan (2003) Saved Policies G1 and NE5; and Guildford Local Plan: Strategy and Sites (2015-2034) Policy ID4.
37. To safeguarding the existing landscape features and ensure their contribution to the character of development and the character of the local area in accordance with Surrey Waste Plan 2020 Policy14 and Guildford Borough Local Plan (2003) Saved Policies G1 and NE5; and Guildford Local Plan: Strategy and Sites (2015-2034) Policy ID4.
38. To safeguarding the existing landscape features and ensure their contribution to the character of development and the character of the local area in accordance with Surrey Waste Plan 2020 Policy14 and Guildford Borough Local Plan (2003) Saved Policies G1 and NE5.
39. To safeguarding the existing landscape features and ensure their contribution to the character of development and the character of the local area in accordance with Surrey Waste Plan 2020 Policy14 and Guildford Borough Local Plan (2003) Saved Policies G1 and NE5.

40. To minimise the impact on the visual amenities, heritage assets and environment of the locality to comply Surrey Waste Plan 2020 Policy 14, Guildford Local Plan: Strategy and Sites (2015-2034) Policy D3 and Guildford Borough Local Plan (2003) Saved Policies G1, HE4 and HE10.
41. To safeguard and protect residential amenity and the environment in accordance with Surrey Waste Plan 2020 Policy 14 and Guildford Borough Local Plan (2003) Saved Policies Policy G1.

Informatives:

1. In determining this application the County Planning Authority has worked positively and proactively with the applicant by: entering into pre-application discussions; scoping of the application; assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its associated planning practice guidance and European Regulations, providing feedback to the applicant where appropriate. Further, the County Planning Authority has: identified all material considerations; forwarded consultation responses to the applicant; considered representations from interested parties; liaised with consultees and the applicant to resolve identified issues and determined the application within the timeframe agreed with the applicant. Issues of concern have been raised with the applicant including impacts of and on noise/traffic/odour/air quality/dust/heritage/flooding/landscape/ecology/visual impact/Green Belt and addressed through negotiation and acceptable amendments to the proposals. The applicant has also been given advance sight of the draft planning conditions and the County Planning Authority has also engaged positively in the preparation of draft legal agreements. This approach has been in accordance with the requirements of paragraph 38 of the National Planning Policy Framework 2021.
2. The applicant is reminded that safe public access must be maintained at all times and no access should be made via the footpath at any time. Should the applicant feel they are unable to ensure public safety while work is underway, a temporary closure may be necessary. A minimum of 3 weeks' notice must be given and there is a charge. Please contact the Countryside Access Officer if this is required.
3. There are to be no obstructions on the public right of way at any time, this is to include vehicles, plant, scaffolding or the temporary storage of materials and/or chemicals. Any down pipes or soakaways associated with the development should either discharge into a drainage system or away from the surface of the right of way.
4. The applicant is reminded that any alteration to, or replacement of, the existing boundary with the public right of way, or erection of new fence lines, must be done in consultation with the Countryside Access Officer. Please give at least 3 weeks notice.
5. Contractor's vehicles, plant or deliveries may only access along a right of way if the applicant can prove that they have a vehicular right. Surrey County Councils' Rights of Way Group will expect the applicant to make good any damage caused to the

surface of the right of way connected to the development. If the applicant is unsure of the correct line and width of the right of way, Countryside Access will mark out the route on the ground. Applicants are reminded that the granting of planning permission does not authorise obstructing or interfering in any way with a public right of way. This can only be done with the prior permission of the Highway Authority (Surrey County Council, Countryside Access Group).

6. The applicant is advised 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 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.
7. The applicant and any associated contractors are recommended to seek Prior Consent (section 61 Control of Pollution Act 1974) approvals to control noise/vibration levels and hours noisy construction for the development. This matter will be dealt with outside of the planning process and currently exists with the Executive Head Regulatory Services, Guildford Borough Council.
8. Biosecurity is very important to minimise the risks of pests and diseases being imported into the UK and introduced into the environment. It is recommended that all trees grown abroad, but purchased for transplanting, shall spend at least one full growing season on a UK nursery and be subjected to a pest and disease control programme. Evidence of this control programme, together with an audit trail of when imported trees entered the UK, their origin and the length of time they have been in the nursery should be requested before the commencement of any tree planting. If this information is not available, alternative tree sources should be used. You are advised to consult the relevant UK Government agencies such as the Animal and Plant Health Agency (APHA) and the Forestry Commission for current guidance, Plant Passport requirements and plant movement restrictions. Quality Assurance Schemes followed by nurseries should also be investigated when researching suppliers. For larger planting schemes, you may wish to consider engaging a suitably qualified professional to oversee tree / plant specification and planting.
9. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/ organisation responsible for the damage.
10. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders (Highway Act 1980 Sections 131, 148, 149).

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Contact Janine Wright

Tel. no. 020 8541 9897

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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, are available to view on our [online register](#). The representations received are publicly available to view on the district/borough planning register.

The Guildford Borough Council planning register for this application can be found under application reference GU22/CON/00006.

## **Other documents**

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

### **Government Guidance**

[National Planning Policy Framework](#)

[Planning Practice Guidance](#)

[National Planning Policy for Waste 2014](#)

[National Planning Policy Statement for Waste Water 2012](#)

### **The Development Plan**

[Surrey Waste Local Plan 2019-2033](#)

[Guildford Local Plan: Strategy and Sites \(2015 – 2034\)](#)

[Guildford Local Plan 2003 Saved Policies](#)

### **Other Documents**

Institute of Air Quality Management (IAQM) (2018) [Guidance on the Assessment of Odour for Planning](#)

Surrey County Council [Guidelines for Noise and Vibration Assessment and Control](#) (2020)

Noise Policy Statement for England (2010)

Surrey County Council [Landscape Character Assessment](#) (2015)

Institute of Lighting Professionals (ILP) [Guidance notes for the reduction of obtrusive light](#) (2021)

Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document (SPD) (2020)

[Institute of Air Quality Management \(IAQM\) Guidance on Monitoring in the Vicinity of Demolition and Construction Sites \(2018\)](#)

IAQM, [Guidance on the assessment of dust from demolition and construction \(2014\)](#)

IAQM, [Guidance on the Assessment of Mineral Dust Impacts for Planning \(2016\)](#)

IAQM "[A guide to the assessment of air quality impacts on designated nature conservation sites](#)" May 2020

IAQM [Guidance on the assessment of odour for planning \(2018\)](#)

British Standard 5228-1 Code of Practice for noise and vibration control on construction and open sites Parts 1 and 2

BS 6472-1:2008: Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting (BSI, 2008).

Defra, National Air Quality objectives [Air Quality Objectives Update.pdf \(defra.gov.uk\)](#)

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