


To: Planning & Regulatory Committee

Date: 29 March 2023

By: Planning Development Manager

District(s) Tandridge District Council

Electoral Division(s):
Godstone
Chris Farr
Case Officer:
Katie Rayner
Purpose: For Decision

Grid Ref: 530940 151448

Title: Minerals/Waste TA/2022/1155
Summary Report
Land at Mercers South Quarry, Bletchingley Road, Nutfield, Redhill, Surrey RH1 4EU
Use of land for the importation of Construction, Demolition and Excavation (C, D & E) Waste and the siting and use of a mobile screener and a crusher to enable the recovery of soils to assist with on-site restoration and the production of recycled aggregates for sale and export.

The application site is situated within the established Mercers South Quarry (hereon referred to as 'the Quarry'). The Quarry extends to approximately 54 hectares (ha), on open countryside land at Mercers Farm. The Quarry has permission for the extraction, screening, and export of sand with progressive restoration to an agricultural end use, with landscape and ecological enhancements, using imported materials until 2036.

The site lies within the Metropolitan Green Belt, where inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. The site is also located in the Holmethorpe Sandpits Complex Site of Nature Conservation Importance (SNCI), the latter of county importance for birds. The northern boundary of the Quarry, marked by Redhill Brook, borders the southern edge of the Surrey Hills Area of Outstanding Natural Beauty (AONB). The eastern most point of the access to the quarry adjoins the Surrey Hills Area of Great Landscape Value (AGLV) boundary.

Planning permission is sought for the temporary use of 0.6ha of land at Mercers South Quarry, for the importation of Construction, Demolition and Excavation (C,D and E) waste and the siting and use of a mobile screener and a crusher to enable the recovery of soils to assist with on-site restoration and the production of recycled aggregates for sale and export. The Soil Recovery Facility (SRF) is expected to process a maximum of 75,000 tonnes per annum (tpa), which will be screened to provide fill material to aid the progressive restoration of the site following the extraction of the sand. Loads which include concrete and hardcore would be fed into the crusher to produce recycled aggregate for sale.

The approved restoration scheme at Mercers South Quarry, is for an agricultural after use with landscape and ecological enhancements. The delivery of this scheme using imported inert materials is already established under the extant planning permission for the site. The

applicant is not seeking to change the approved final restoration scheme as part of this development.

The matters to be considered in the determination of this the application are the suitability of the location of the SRF facility, the contribution the proposal would make towards the sustainable management of waste in line with national and local policy, the cumulative impact of the development on the local environment and amenity in terms of traffic, noise, air quality, landscape, cultural heritage, biodiversity, flood risk, contamination and the Green Belt, assessed in the context of the existing operational quarry.

One letter of support and a total of eight objections have been received in response to the application. The objectors raise concerns regarding the potential increase of Heavy Goods Vehicle (HGV) movements arising from the site as a result of the SRF facility. The Godstone Village Association have also objected to the proposal on the increase in HGV movements through the village of Godstone.

Officers recognise the concerns expressed by interested parties regarding the HGV movements, however, the HGV movements associated with the operation of the SRF facility are to remain within the overall permitted daily movements for the site, as permitted under Condition 8 of planning permission TA/2019/2147 dated 10 September 2020, these being no more than an average of 300 HGV movements per day Monday – Friday not exceeding 350 movements on any single day; and no more than an average of 150 HGV movements per day on Saturdays, not exceeding 240 movements. The same conditions will be attached to any grant of planning permission for the SRF facility, ensuring that the cumulative HGV traffic for the Quarry does not exceed the levels that are already permitted. On this basis the County Highway Authority have raised no objection to the proposal.

The proposed SRF is a temporary use of the land, commensurate with the life of the operational quarry site. Officers consider that the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations which amount to very special circumstances. These comprise the location and scale of the proposed facility, its contribution to the timely restoration of the quarry and to the recycling targets in the County. Officers consider that there is no other harm, subject to the imposition of conditions.

Tandridge District Council and the adjacent authority Reigate and Banstead Borough Council raise no objection to the proposal. In all other technical respects and advice received from statutory consultees, there are no policy objections in relation to the impact on local amenity in terms of highways, noise, air quality, landscape and visual impact, ecology and biodiversity, flood risk, contamination or cultural heritage. Where safeguards are required, these can be secured through the imposition of conditions. There is a proven need for further aggregate recycling capacity in the county in the long term. This proposal would provide for a waste management facility with a local catchment area, to recover waste and would assist in the restoration of the wider quarry site by 2036. Taking all these matters into account, Officers consider that very special circumstances exist which outweigh the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal, and temporary permission should be granted subject to suitable planning conditions.

The recommendation is to PERMIT subject to conditions.

Application details

Applicant

J & J Franks Ltd

Date application valid

16 August 2022

Period for Determination

15 November 2022, extension of time until 10 April 2023.

Amending Documents

Drawing No: MS-SR-4 Rev 00, Illustrative Section – Soils Recovery and Aggregate Recycling (SRF), dated 16.01.23.

Ecology Technical Note – Consideration as to the importance of the Holmethorpe Sandpits SNCI in relation to the application for soils recovery at Mercers Quarry, Surrey.

Summary of Planning Issues

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

	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the reports where this has been discussed
Waste Management Need	Yes	63-95
Highways, Traffic and Access	Yes	96-112
Landscape and Visual Impact	Yes	119-137
Cultural Heritage	Yes	138-154
Noise	Yes	155-176
Air Quality and Dust	Yes	177-203
Ecology and Biodiversity	Yes	204-220
Flood Risk and Drainage	Yes	221-229
Contamination	Yes	230-236
Metropolitan Green Belt	Yes	238-255

Illustrative material

Site Plan

Plan 1

Drawing No: MS/SR/2 Rev E, Site Plan, dated 13.06.22

Drawing No: MS/SR/3 Rev B, Indicative Layout – Soils Recovery, dated 14.06.22

Aerial Photographs

Aerial 1
Aerial 2

Site Photographs

Figure 1: View looking west towards the built site compound area, including site office and weighbridge.

Figure 2: View looking north from the built site compound towards Phase 1 of the Quarry.

Figure 3: View looking north-west into Phase 1 and the proposed area of the Soil Recovery Facility.

Figure 4: Further view looking north-west into Phase 1 and the proposed area of the Soil Recovery Facility.

Figure 5: View looking south from within Phase 1 towards the area of the proposed Soil Recovery Facility.

Figure 6: View looking north into Phase 1 from the Wheel Wash Facility.

Figure 7: View looking south-west from the eastern site boundary soil mound towards Phase 1.

Background

Site Description

1. The application site is situated within the established Mercers South Quarry. The Quarry extends to approximately 54 hectares (ha), on open countryside land at Mercers Farm. The Quarry is situated to the north of the A25 (Bletchingley Road), approximately 2.5 kilometres (km) north-east of Redhill, with Merstham to the north and the villages of Nutfield and Bletchingley on the A25 to the south and south-west respectively. The site is situated approximately 0.25 kilometres (km) to the west of the M23 motorway (Junction 8) and 1km south of the M25 motorway (Junction 7).
2. The Quarry has permission for the extraction, screening, and export of sand with progressive restoration to an agricultural end use, with landscape and ecological enhancements, using imported materials until 2036. The site is accessed from the A25 (Nutfield Road/Bletchingley Road) via a purpose built tarmac surfaced road built to highway specifications. At the foot of the haul road is the built site compound (site office, weighbridge and staff parking facilities). Footpath 173 has been diverted for the duration of the permission to follow the southern site boundary of the sand extraction area running from Nutfield Marsh Lane to the junction with Footpaths 175 and 188. The applicant has implemented the safeguarding measures (gates and signage) secured by planning conditions to maintain safe public access along the footpaths at the crossing point with the haul road.
3. To the west of the Quarry is Mercers Park, a former silica sand quarry and now a countryside park used mainly for water sports. To the north lies Spynes Mere, another former silica sand quarry, restored to a lake and nature reserve. The application site and existing quarry lie within the Metropolitan Green Belt and within the Holmethorpe Sandpits Complex Site of Nature Conservation Importance (SNCI), the latter of county importance for birds. The northern boundary of the quarry, marked by Redhill Brook, borders the southern edge of the Surrey Hills Area of

Outstanding Natural Beauty (AONB). The quarry lies within 13km of the safeguarding area for the Biggin Hill Airfield and Gatwick Airport. The eastern most point of the access to the quarry adjoins the Surrey Hills Area of Great Landscape Value (AGLV) boundary.

4. A number of built heritage assets are located in proximity to the application site, these comprise The Glebe House (Grade II, mid 18th Century), Mill Cottage (Grade II, 17th Century), Leather Bottle Cottage (Grade II, dendrodate to 1549/1550); Charmans Cottage (Grade II, dendrodate to 1558/59) and Peyton's Cottages (locally listed, late 18th/early 19th centuries). These buildings represent a range of vernacular buildings from the 16th to 19th centuries. Their setting varies between relatively enclosed sites such as The Glebe House and Mill Cottage to more open surroundings on the edge of common land as in the case of Leather Bottle Cottage and Charmans Cottage.
5. The closest residential property to the application site, is the Grade II Listed Mill Cottage, which lies approximately 250 metres (m) west of the application site boundary. Other properties are located to the east of the Quarry including Puckhaw Cottage and Peyton Cottages, which are located approximately 280m from the boundary of the application site. The closest residential properties to the access road are those located along the A25 approximately 70m east of the quarry access.

Planning History

6. The Nutfield area forms a complex of historical workings for Fullers Earth and overlying sands both north and south of the A25.
7. Planning permission (Ref: TA/2013/1799) was granted on 12 August 2014, for the extraction and screening of sand from Mercers South with: the construction of a new dedicated internal access from the A25; screening bunds; the provision of a welfare/office block and mobile home to accommodate staff and security personnel; a wheelwash, weighbridge and associated office; car parking area; reinstatement of rights of way network, woodland, historic hedgerows and ditch to include landscape and ecological enhancements, on a site of 52.2ha and the temporary diversion of public footpath 173 for the duration of the operations.
8. On 23 April 2018 planning permission Ref: TA/2017/2346 was granted for the extraction and screening of approximately 250,000 tonnes of sand from an area of 1.67ha, as an extension to the phasing within the existing Mercers South Quarry, with progressive restoration to agriculture using inert waste materials.
9. In September 2018, two Non-Material Amendment (NMA) applications to Ref: TA/2013/1799 and Ref: TA/2017/2346, were approved to change the infill material at the site from inert waste to non-hazardous waste. In June 2019 planning permission (Ref: TA/2018/2174) was granted for the erection of a vehicle maintenance workshop building in connection with the working and restoration of Mercers South Quarry. In combination with the workshop application the applicant submitted application Ref: TA/2019/34 seeking permission for the development of land without complying with Condition 1 of planning permission Ref: TA/2013/1799 dated 12 August 2014, to allow minor amendments to the 'as built' design and layout of the compound area of the site containing the site office and weighbridge, originally permitted in 2014. The application (Ref: TA/2019/34) was granted planning permission in June 2019 and subject to some 28 planning conditions.

10. Planning permission Ref. TA/2019/34 was further varied on 10 September 2020 under Ref: TA/2019/2147 to allow revision to the numbers of lorry movements¹. The permission allowed a change from 150 HGV movements per day associated with the extraction and importation of inert waste materials, with HGV movements on any single day not exceeding 240 movements, to no more than an average of 300 HGV movements per day, with HGV movements on any single day not exceeding 350 movements. Planning permission Ref: TA/2019/2147 dated 10 September 2020, is the extant permission for the site. As per planning Condition 2 of Ref: TA/2019/2147, restoration of the site is to be completed by 31 December 2036.

The proposal

11. Planning permission is sought for the temporary use of land for the importation of Construction, Demolition and Excavation (C,D and E) waste and the siting and use of a mobile screener and a crusher to enable the recovery of soils to assist with on-site restoration and the production of recycled aggregates for sale and export.
12. The Soil Recovery Facility (SRF) is proposed to be located to the north of the existing built development 'compound' at the quarry, which comprises the site office, weighbridge and transport workshop, as shown on submitted Drawing No: MS/SR/1 Rev E Site Location Plan, dated June 2022 and Drawing No: MS/SR/2, Rev E, Site Plan, dated June 2022. The application site covers an area of 1.78ha including the dedicated internal haul road from the A25, of which the area required for the SRF, including stockpiling areas measures 0.6ha in total. The SRF would occupy an area within the current Phase 1 of the Quarry, where sand has already been extracted. The SRF would be operated at a level of approximately 87 Above Ordnance Datum (AOD), some 4 metres (m) below ground level.
13. Drawing No: MS/SR/3 Rev B, Indicative Layout – Soils Recovery and Aggregates Recycling, dated 14 June 2022 shows the proposed SRF area, including a mobile screener (4.4m in height), a crusher (3.2m in height), associated stockpiles of material pre and post screening and crushing and space for the manoeuvring lorries. Within this area, the area dedicated to stockpiling (up to a proposed height of 4m) would be primarily for the single recycled aggregate (6F5) that the site expects to export. All other material will be used for the progressive restoration of the quarry.
14. The SRF is expected to process a maximum of 75,000 tonnes per annum (tpa), which will be screened to provide fill material needed to fill a proportion of the quarry voidspace (equivalent to 37,500tpa), to aid the progressive restoration of the site following the extraction of the sand. The 'windfall by-product' of this additional waste stream would be an estimated 37,500tpa of 6F5 recycled aggregate², which will be sold and exported from the site.
15. All incoming C,D and E waste would enter the site via the dedicated haul road and past the weighbridge office. A visual inspection of each load would determine whether it should be directed straight to the void for infilling or to the proposed SRF for processing. Clay materials and other non-recyclable loads would be tipped straight into the void to progress infilling. Loads which include concrete, would be directed to the SRF to be placed into the screener using a loading shovel. Soils recovered from the screening process would be used to assist with the ongoing restoration of the site, whilst selected materials such bricks, concrete and hardcore would be fed into the crusher to produce recycled aggregate for sale. It is anticipated

¹ Reported to and determined by the Planning and Regulatory Committee on 3 September 2020.

² 6FS is a recycled aggregate that is made up of crushed hardcore materials including crushed concrete.

that materials suitable for soils recovery would constitute approximately 20- 25% of the overall volume imported into Mercers South Quarry, with an estimated 50% (up to 37,500tpa) being recovered soils for restoration (taking account of seasonal variation). The permitted sand extraction output (250,000tpa), void volume to be filled (150,000m³) and waste type for infilling (C,D and E) would remain unchanged.

16. The applicant has set out within the submission that the availability of material for the restoration of Mercers South Quarry has been an ongoing concern regarding their ability to deliver progressive restoration within the permitted timeframe and to maintain the supply of a regionally important building sand. The applicant is therefore seeking to maximise the potential for restoration materials by introducing the onsite SRF to capture and recover restoration soils from C,D and E waste streams.
17. In combination with this application, the applicant has also submitted application Ref: TA/2022/1220 seeking permission for the development of land without complying with Conditions 1, 9 and 24 of planning permission Ref: TA/2019/2147 dated 10 September 2020, to allow for a revision to the phased restoration of the site to delay the restoration of a 0.6ha area of phase 1 which is where, the SRF facility would sit and the relocation of the wheel wash facility.

Consultations and publicity

District Council

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| 18. Tandridge District Council | - | No objection, it is requested that the observations as raised by the Contaminated Land Officer are noted and addressed if the permitting regimes do not adequately cover the matters. |
| 19. Tandridge District Council – Environmental Health, Contaminated Land Officer | - | No objection, subject to two sets of controls including a suitable water spray based dust abatement system to minimise dust emissions from the site, and a material management and movement plan. |

Consultees (Statutory and Non-Statutory)

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| 20. Reigate and Banstead Borough Council (adjoining Authority) | - | No objection |
| 21. County Archaeological Officer | - | As the proposed development is sited wholly within areas that have previously been subject to conclusive archaeological investigations, no archaeological concerns. |
| 22. County Enhancement Officer | - | No objection, the proposal will delay the restoration of a small area of the site, but should bring in additional recovery/fill |

- material to secure and speed up the restoration overall.
23. Environment Agency - No objection.
24. County Historic Buildings Officer - No objections, the application site makes no contribution to the setting of the buildings, except potentially from noise. As shown in the noise assessment, the proposed noise levels will not exceed those already agreed for the quarry.
25. County Landscape Architect - Overall, it is considered that there will be a limited degree of harm in landscape and visual terms arising from the proposed SRF and associated delay to the restoration of the 0.6ha of the site. It is recommended that planning conditions are attached to any grant of permission to control the operational ground level for the SRF facility and the height of stockpiles. It would be preferable if these parameters could be shown via cross section drawings that could then form part of the approved drawing package for the development.
Officer Comment: Cross Section Drawings were provided by the applicant in support of the application.
26. Natural England - No objection, the proposed development will not have a significant adverse impact on designed sites. Given the proposed development is located within an area which Natural England is assessing as a boundary variation to the AONB, an assessment of the landscape and visual impacts of the proposal on this area should therefore be undertaken, with opportunities to avoid or minimise impacts and secure enhancement opportunities.
27. Rights of Way Officer - No views received.
28. County Air Quality Consultant - Agree with the applicant's assertion that the proposed development is unlikely to have a significant dust effect.
29. Lead Local Flood Authority - No comments to make on this application, no change to the drainage strategy or surface water drainage system.

30. County Ecologist - Following the submission of further information on the potential impact of the proposed SRF on the Holmethorpe Sandpits Complex SNCI, satisfied that an up to date assessment has been provided and that there is no reason to consider that there is likely to be an impact on the SNCI directly or indirectly as a result of the SRF.
31. Surrey Wildlife Trust - Object, it is noted that the site is located in the Holmethorpe Sandpits Complex (SNCI) and the Holmesdale Biodiversity Opportunity Area (BOA), the restoration of a significant proportion of the site is to agriculture which is lacking in scope and does not make best use of the opportunity presented that could essentially re-purpose all of the land for biodiversity and nature conservation and recovery.
32. Sutton and East Surrey Water - No views received.
33. Thames Water - No objection.
34. County Highway Authority - No objection, there would be no change to the overall permitted HGV movements stipulated by Condition 8 of planning permission TA/19/2147. The daily HGV movements arising from the proposed SRF combined with the existing HGV movements associated with mineral extraction would not exceed the permitted thresholds. The site operator should continue to maintain accurate records of the number of HGV vehicles accessing and egressing the site daily and make these accessible to the County Planning Authority on request
35. Biggin Hill Airport Ltd - No views received.
36. Gatwick Airport Safeguarding - No objection, the proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria.
37. County Geotechnical Consultant - The overarching planning statement suggests that an Environmental Permit is already in place for the Soil Recovery Operation. If this is the case then all pollution control activities in respect of the incoming waste streams and the recovery operations

on site will be covered by the Permit and there will be no need for the CPA to duplicate regulation.

Is it possible that operations on the soil recovery site could be, potentially contaminative. It is therefore recommended that a condition is attached to any grant of planning permission to ensure that these parts of the site are checked for legacy contamination after decommissioning and removal of hardstanding's, structures, drainage features and pavements etc but before the commencement of placement of final restoration soils.

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| 38. | Historic England | - | No comments to make on this application. It is suggested that views are sought from the County specialist conservation and archaeological advisers. |
| 39. | HSE – Quarries | - | No views received. |
| 40. | Surrey Hills AONB Officer | - | No protected landscape views on the above restoration proposal on this long established mineral extraction site. |
| 41. | National Grid | - | No views received. |
| 42. | County Noise Consultant | - | It is considered that the proposed development is unlikely result in noise impacts any greater than those already permitted. Therefore, if SCC is minded to grant permission, it is recommend that the existing planning conditions are brought forward to apply to the whole site, including the proposed SRF. However, as the predicted noise levels are close to the previously agreed planning criteria, it is recommended that, where possible, an additional planning condition is included with any new permission to allow SCC to request noise monitoring if / when required to check compliance with Condition 17. |

Parish/Town Council and Amenity Groups

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| 43. | Nutfield Parish Council | - | No views received. |
| 44. | Bletchingley Parish Council | - | No objection. |

45. Godstone Village Association - Objection, due to the resulting increase in the number of HGV movements passing through the village. The village already has a number of HGV movements per day, which at peak times amounts to multiple lorries each minute passing through the village. This level of HGV movements causes considerable damage to the houses and those who live in them proximate to the roads. As a result the houses are shaken and infrastructure is burdened well beyond its original intention.
46. Nutfield Marsh Residents Group - No views received.
47. Nutfield Conservation Society - No views received.
48. Surrey Ramblers Association - No views received.
49. Campaign to Protect Rural England - No views received.
50. QOG Quarry Observation Group - No views received.
51. Traffic Action Group (TAG) A25 - No views received.

Summary of publicity undertaken and key issues raised by public

52. The application was publicised by the posting of four site notices and an advert was placed in the local newspaper. A total of 102 owner/occupiers of neighbouring properties were directly notified by letter.
53. One letter of support, raising no objection to the proposal and eight letters of objection were received in response to the application. The letters of objection all raise objection to the proposal on the grounds of increase in Heavy Goods Vehicles (HGVs) on the local road network. A summary of the matters raised are provided below:
- The associated lorry movements must be included in the current quota for the site.
 - An increase in traffic through the village of Godstone as a result of this proposal would be unacceptable, due to increased public safety concerns both with increased pollution and also danger to life both pedestrians and cyclists.
 - There is already a significant amount of HGV traffic, which is contributory to the noise and pollution along this stretch and the snarl ups leading to and through Godstone Village.

- HGVs are taking 'rest' periods on side roads along the A25 and there is a constant dumping of detritus including human waste which is unacceptable now, let alone with increased HGV traffic.
- Further damage on and along the A25 from heavy vehicle traffic would add to the disruption and environmental damage to the area from this proposal.
- Every time there is an issue with the M25, and that is most of the time, traffic clogs up the village increasing pollution. Strongly object, to yet more HGV traffic being imposed on Godstone by this operator, trucks should be routed on to the M23.
- The rural quality of the area and wildlife will be ruined by HGV lorries, including horrendous smell, noise and pollution from the machinery.
- Impact on listed and old properties which are more sensitive to the vibration of speeding lorries and drilling operations.

Planning considerations

Introduction

54. 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.
55. In this case the statutory development plan for consideration of the application consists of the Surrey Waste Local Plan Part 1 – Policies 2020 (SWLP 2020), Surrey Minerals Plan Core Strategy Development Plan Document 2011 (SMP 2011), the Surrey Minerals Plan Core Strategy Primary Aggregates Development Plan Document 2011 (PADPD2011), the Aggregates Recycling Joint Development Plan Document 2013 (ARJDPD 2013), along with Tandridge District Council Core Strategy 2008 (TDCS 2008), Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (TDLP 2014) and the Mineral Site Restoration Supplementary Planning Document (SPD), adopted alongside the SMP 2011. There is no Neighbourhood Plan covering the area of the application site.
56. The SWLP 2020, SMP 2011 and ARJDPD 2013 are currently in the process of being replaced by a Joint Surrey Minerals and Waste Local Plan (MWLP). An Issues and Options consultation was held between November 2021 and closed in March 2022, which included a 'call for sites'. The next step in preparing the MWLP will be the Preferred Options Public Consultation (Draft Plan).
57. In accordance with Paragraph 48 of the National Planning Policy Framework (NPPF) 2021, weight can be given to relevant policies in emerging plans according to the stage of preparation (the more advanced its preparation, the greater the weight that can be given). Accordingly, the Joint Surrey Minerals and Waste Local Plan (MWLP) is at an early stage of production and does not attract any weight in the determination of this application at this time.
58. Further, the TDCS 2008 and TDLP 2014 are also being replaced. Tandridge District Council (TDC) submitted their emerging local plan 'Our Local Plan 2033' in January 2019 to the Planning Inspectorate. An examination in Public (EiP) commenced in October 2019 and was completed by the end of November 2019. Following this the Inspector's preliminary conclusions and advice was received in December 2020. Since that time, correspondence has taken place between TDC and the Planning

Inspectorate with regards to the Transport Authority and Highways England. These matters remain unresolved at the time of this report.

59. Given the plan has undergone EiP stage, Officers consider that policies within this Plan can be afforded some weight in the decision making for this application. However, this weight does not outweigh those policies that form part of the TDCS 2008 and TDLP 2014 which are part of the adopted Development Plan.
60. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations.
61. 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: the waste management need; highways, traffic and access; environmental and amenity matters including landscape and visual impact, cultural heritage, noise, air quality (dust), ecology and biodiversity, flood risk and drainage and contamination and the impact on the Metropolitan Green Belt.

Environmental Impact Assessment

62. The proposed development was assessed by the County Planning Authority (CPA) in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and the advice set out in the National Planning Practice Guidance (NPPG) on Environmental Impact Assessment (EIA). On 28 July 2022, the CPA adopted a screening opinion under Regulation 8 of the above EIA Regulations. Having considered the proposed development in the context of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), it was concluded that the development to which this application relates is not likely to give rise to any environmental effects (in terms of the meaning of significance in EIA Regulations) and it was therefore recommended that the proposed development does not constitute EIA development.

WASTE MANAGEMENT NEED

Surrey Minerals Plan Core Strategy Development Management Plan 2011 (SMP 2011)

Policy MC1 – Location of mineral development in Surrey

Policy MC5 – Recycled and secondary aggregates

Surrey Waste Local Plan Part 1 – Policies 2020 (SWLP 2020)

Policy 1 – Need for Waste Development

Policy 3 – Recycling of inert Construction, Demolition and Excavation Waste

Policy 10 – Areas suitable for development of waste management facilities

Aggregates Recycling Joint DPD for the Minerals and Waste Plans (ARJDPD 2013)

Policy AR3 – Aggregates recycling at mineral sites

Policy AR4 – Aggregates recycling outside preferred areas

Policy AR5 – High value recovery

Policy context

63. In England, the waste hierarchy is both a guide to sustainable waste management and a legal requirement, enshrined in law through the Waste (England and Wales) Regulations 2011. The hierarchy gives top priority to waste prevention, followed by

preparing for re-use, then recycling, other types of recovery (including energy recovery), and last of all disposal e.g. landfill.

64. The National Planning Policy Framework (NPPF) 2021, does not contain policies relating to waste management. National waste management policies are contained within the Waste Management Plan for England (WMP) 2021 and set out in the National Planning Policy for Waste (NPPW) 2014. The WMP 2021 advocates the recovery or recycling of inert waste wherever possible and recognises that the disposal of inert waste in or on land remains a valid way of restoring quarries and mineral workings where there is a planning requirement. The NPPW (2014) sets out the Government's ambition of working towards more sustainable and efficient approaches to waste management by driving the management of waste up the waste hierarchy.
65. In this context, paragraph 81 of the NPPF 2021 states that the planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. With respect to Mineral development, paragraph 209 of the NPPF 2021, establishes that minerals can only be worked where they are found and that a sufficient supply of minerals is essential to the provision of the 'infrastructure, buildings, energy and goods that the country needs'. Policy MC17 of the SMP 2011 states that restoration of mineral workings should be completed at the earliest opportunity and progressive restoration will be required where appropriate. Delay in restoration has environmental costs and guidance at Paragraph 211 of the NPPF 2021 states that Mineral Planning Authorities should provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions.
66. The NPPW (2014) sets out that when determining planning applications the CPA should: only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up to date Local Plan; consider the likely impact on the local environment and amenity against the criteria set out in Appendix B of the NPPW and the locational implications of any advice on health from the relevant health bodies; ensure that waste management facilities in themselves are well-designed so that they contribute positively to the character and quality of the area in which they are located; concern themselves with implementing the planning strategy in the Local Plan and not the control of processes which are a matter for the pollution control authorities³.
67. The approved restoration scheme at Mercers South Quarry (Ref: TA/2013/1799 dated 12 August 2014, and under the extant permission Ref: TA/2019/2147 dated 10 September 2020), is for an agricultural after use with landscape and ecological enhancements. The delivery of this scheme using imported inert materials is already established under the extant planning permission for the site. The permitted sand extraction output (250,000 tonnes per annum (tpa)), void volume to be filled (150,000m³ per year) and waste type (C,D&E) would remain unchanged. The applicant is seeking to attract a greater proportion of this waste stream from

³ In this case the Environment Agency and Tandridge District Council.

construction sites, (maximum of 75,000tpa) which would be screened through the proposed SRF to provide material needed to fill a proportion of the void space (equivalent to 37,500tpa) to aid progressive restoration following sand extraction. A 'windfall by product' of this waste would be an estimated 37,500tpa of 6F5 of recycled aggregate, which the applicant explains would contribute to recycling targets in Surrey. The applicant states in the Overarching Planning Statement (dated July 2022) that it is anticipated that materials suitable for soil recovery to be used in the restoration of the site, could constitute approximately 20-25% of the overall volume imported into Mercers South Quarry.

68. Policy MC1 of the SMP 2011 establishes a priority for locating aggregate recycling development in urban areas, particularly in northwest Surrey. This strategy is driven by the need to reduce haulage distances and associated emissions of lorries, by locating facilities close to the locations where materials would arise and be used following processing. Where urban land is not available consideration should be given to suitably located previously developed land close to urban areas, subject to Policy MC3 (Mineral development in the Green Belt), and to the temporary use of mineral sites to restore with inert fill. Policy MC5 of the SMP 2011, encourages the re-use of construction and demolition waste at source or its separation and collection for recycling. The CPA will make provision for the supply of recycled and secondary aggregates of 0.8 million tonnes per annum (Mtpa) by 2016 and of at least 0.9Mtpa by 2026.
69. Policy AR3 of the ARJDPD 2013, sets out that temporary permission will be granted in accordance with the requirements of the Surrey Waste Plan (SWP) 2008 Policy WD3, superseded by Policy 3 in the SWLP 2020, for development involving C,D and E waste at mineral sites where the proposed development is at a preferred area for primary aggregates as set out in the Surrey Minerals Plan Primary Aggregates DPD (comprising A - Addlestone Quarry Extension, C – Hamm Court Farm and D- Milton Park Farm) and the development proposed meets the key development requirements set out in the Primary Aggregates Development Plan Document 2011 (PADPD). The application site is the only preferred area identified within the SMP 2011 for the extraction of soft sand (Preferred Area P – Mercers Farm, Nutfield), however it not a site identified under Policy AR3 of the ARJDPD 2013 as a preferred mineral site for aggregates recycling as such there is a requirement for the proposal to demonstrate a quantitative or market need in accordance with the NPPW.
70. Policy AR4 of the AJDPD 2013 states that applications for new aggregates recycling facilities outside the preferred areas identified will be supported where it can be demonstrated that the development would result in an increase in the recovery of C,D and E waste material suitable for the production of recycled aggregates and comply with the locational and development management policies contained within the SMP 2011 and SWP 2008, superseded by the SWLP 2020. Policy AR5 of the ARJDPD states that planning applications for aggregates recycling facilities will be expected to demonstrate that the development will maximise the amount and range of recyclable materials that can be recovered from the C, D and E waste stream delivered for treatment at the site.
71. Policy 1 of the SWLP 2020, seeks to ensure that new waste developments contribute towards achieving targets for the management of waste at the highest point practical in the waste hierarchy. Policy 3 of the SWLP 2020, states that planning permission

for the development of C,D and E waste recycling facilities will be granted where: (i) the site is allocated in the ARJDPD 2013 or (ii) the site is a mineral working where the nature and duration of the proposed activity is limited to the consented operation and/or restoration of the mineral working.

72. Policy 10 of the SWLP 2020, sets out the spatial strategy and overall approach to the location of new waste management capacity across Surrey. This strategy together with paragraph 4.1.1.4 of SWLP 2020 presents a hierarchy showing the broad preference for the development of waste management facilities, with the focus on sites on land outside of the Green Belt. Areas potentially suitable for waste management development include:
- Sites allocated for waste management (Policy 11a) – Strategic Waste Site Allocations, not in the Green Belt.
 - On land identified as an ‘Industrial Area of Search’ as shown in the policies map.
 - On any other land identified for employment use or industrial and storage purposes by district and borough councils.
 - On land considered to be previously developed and/or redundant agricultural and forestry buildings and their curtilages.
 - On land that is otherwise suitable for waste development when assessed against other policies in the Plan.
73. The acceptability of the principle of this proposal should therefore be assessed on whether the proposal is suitably located in accordance with the criteria of Policies 3 and 10 of the SWLP 2020 and Policy AR4 of the ARJDPD 2013 and whether the proposal would positively contribute to the C,D and E waste recycling in the County in terms of the C,D and E waste recycling targets for the County.

Suitability of the Site Location

74. The application site is not in an existing waste use, nor is it an allocated site for such use within the SWLP 2020 and it does not fall within an ‘Industrial Land Area of Search’ (ILAS) as shown on the policies map for the SWLP 2020.
75. Permission is sought for the installation and use of the SRF on the active Mercers South Quarry, where its primary purpose would be to assist with the progressive restoration of the site. In view of this, the proposed SRF facility would be limited in duration to the restoration of the quarry, requiring removal by 2035 to allow restoration of the site by 2036 (as per planning Condition 2 of Ref: TA/2019/2147 dated 10 September 2020), which would be secured by Condition attached to any grant of planning permission for the proposed development.
76. As set out above, Policy 3 of the SWLP 2020 is supportive of C,D & E waste recycling facilities at mineral workings where the nature and duration of the proposed operations is limited to the consented activity, or the site is otherwise suitable for inert C,D & E waste recycling operations when assessed against policies in the SWLP 2020, which are discussed further in this report.
77. Paragraph 5.3.1.5 of the SWLP 2020, acknowledges that the waste needs of the County are unlikely to be met without developing waste management facilities within the Green Belt, given the extensive coverage of Green Belt in Surrey (approximately 73%) and the need to locate facilities close to the source of waste. Green Belt considerations are discussed further in the relevant section of this report. As such, subject to the assessment of the development against the other policies of the

Development Plan, as discussed further in this report, the location of the proposed SRF is accepted in principle within the locational criteria of Policies 3 and 10 of the SWLP 2020 and Policy AR4 of the ARJDPD 2013.

Need

78. Mineral sites in Surrey have traditionally been restored by infilling with waste and returned to agriculture or a water-based after use. It is acknowledged in the Minerals and Waste Local Plan – Issues and Options paper published in November 2021⁴, that the recycling of C, D and E waste makes an important contribution to the replacement of primary land-won and marine aggregates (particularly concreting aggregates) and can reduce the reliance on primary materials. There are several potential management options of C, D and E waste (following the Waste Hierarchy of most preferable to least preferable) including: waste prevention; recycling to produce recycled aggregate; recovery, through use in mineral site restoration; and disposal by deposit on land.
79. Officers recognise that the relationship of C, D and E waste recycling and mineral site restoration is changing as reserves of land-won concreting aggregates may cease to be commercially viable and the need to improve the materials efficiency of the economy becomes more pressing. In addition, recycling is becoming more sophisticated resulting in increased rates of recycling and less material available for restoration purposes. Continuation of these trends will increase the need for replacement materials and aggregate recycling capacity in the County. Officers recognise that this position coupled with the introduction of the landfill tax has reduced the quantity of inert waste available for mineral site infilling and restoration purposes.
80. The applicant has set out in the Overarching Planning Statement (dated July 2022), that the availability of material for the restoration of the quarry has been an on-going concern, regarding their ability to deliver progressive restoration within the permitted timeframe (until 2036) and to maintain the supply of soft sand in line with the targets of the Surrey Minerals Plan. In this respect, the applicant has set out that the shortage of restoration material would affect their ability to control water ingress (via dewatering), which would directly affect the extent of the open mineral extraction voids at any one time.
81. In response to the growing concern, the applicant has proactively responded to the market and sought to adapt operations. To date this has comprised, obtaining a non-material amendment to planning permissions Ref: TA/2013/1799 and Ref: TA/2017/2346 to widen the type of material allowed to be imported to infill the voids allowing the site to receive non-hazardous low biodegradable soils⁵. An increase in HGV movements to account for a combination of factors which would affect restoration timescales, including allowing the applicant greater flexibility in responding to market demands for sand and to fluctuations in the availability of restoration materials (Ref: TA/2019/2147 dated 10 September 2020).
82. More recently the applicant has obtained a variation to the Environmental Permit at the site issued by the Environment Agency. The previous permit restricted the

⁴ [8. Aggregate Minerals And Infrastructure v1.pdf \(cloudinary.com\)](#)

⁵ Biodegradable fill with an organic content no greater than 10%.

importation of mixed loads of soil and granular material, to cohesive materials such as clays and chalk containing only an incidental quantity of granular components. In the applicants experience this constrains them from full access to materials at construction sites which would otherwise be suitable for restoration. For instance, a single muck-away contractor is a more desirable option for construction sites with the ability to remove all the excavation materials from site including 'made-ground'⁶, to then recover and recycle the materials to bring back to the construction project as a suitable recycled aggregate for use, offering a 'one-stop' shop.

83. The proposed SRF alongside the new recovery permit would allow the applicant to encourage a wider range of restoration materials into the Quarry to provide greater assurances with the progressive restoration of the site and to maximise the benefits of new sources of inert material, to recover and recycle aggregate for resale. Further, backloading lorries used to import restoration materials into Mercers South with crushed materials would in the applicant's view provide the additional benefit of reducing the number of empty HGVs on local roads, as well as congestion and emissions that would arise if the contractor had to make an additional journey to source the crushed materials from elsewhere.
84. As set out at paragraph 66 of the AJRDPD, an aggregate recycling facility at a mineral site would act as a catalyst for attracting a greater volume of higher quality C,D and E waste for recycling. Residual waste from the recycling operation could then be landfilled into the former mineral working rather than being sent off site, hence lessening the impact of double handling and reducing lorry traffic/movements. It is therefore recognised, that the presence of a soil recovery facility may assist in securing earlier restoration of the mineral working as more C,D and E waste would be attracted to the site.
85. Given the improvements to C,D and E waste recycling and the greater market emphasis on its re-use, the applicant has stated that the production and sale of these alternative materials would be secondary to the fundamental purpose of installing an SRF, which is to enable the site to recover soils from the waste they previously would not have had access to, for the purpose of delivering the timely restoration of the site. As such a modest proportion of the total waste imported to the site would be processed through this facility, whilst material suitable for direct placement into the mineral void would continue to be brought into the site. However, the facility would make a contribution to the County's aggregate recycling targets.
86. Current estimates of waste arisings and waste management capacity in Surrey are reported in the latest Planning Service Annual Monitoring Report (AMR) 2020-2021⁷. Alongside the AMR 2020-2021 Surrey County Council produce a Local Aggregates Assessment (LAA) 2021⁸, which provides an annual assessment of the demand for and supply of aggregates in the County. The applicant has referenced the LAA 2021 and has provided a review of the existing recycling capacity in the County. Given the increasing reliance on recycled aggregates as a source of supply and substitute for primary materials, the LAA 2021 considers the rate of 1.0 million tonnes per annum

⁶ Excavation material to be removed from site (muck-away), containing a mixed of materials including hardcore.

⁷ [Planning Service Annual Monitoring Report 2020 to 2021 - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/planning-service-annual-monitoring-report-2020-to-2021)

⁸ [Local Aggregates Assessment 2021* - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/local-aggregates-assessment-2021)

(Mtpa). of recycled aggregate capacity to be more robust basis for assessing future supply capacity.

87. It is reported within the LAA 2021, that current capacity at recycled aggregate sites is approximately 1.5Mtpa. This figure is comprised of sites with permanent recycling capacity and those with temporary recycling capacity (located on mineral sites in the County) The LAA 2021 confirms that 65% of this capacity is provided on sites with temporary planning permission. As such there will be a significant capacity loss of C, D and E waste management over the next ten years, with supply predicted to fall below 1.0mtpa by 2027. In addition, capacity at fixed sites increased from 0.25 million tonnes (Mt) in 2007 to 1.23mt in 2019 and dropped to 0.7 million tonnes in 2021 due to the Covid-19 pandemic.
88. It is also necessary to consider the geographical spread of sites and whether this reflects the sources of C,D and E waste arisings and the market for recycled materials. Officers recognise that different sites and facilities will provide different types of product or cater for different markets. At present most of the temporary C, D and E waste facilities are concentrated in the north and west of the County, and the life of these is finite and linked to the restoration of the mineral sites where they are located. In terms of the permanent facilities, the closest permanent site is at Reigate Road Quarry, Betchworth, operated by the applicant, which serves a different market to the proposed SRF. The other permanent sites within the County are located in the far north or far south of Surrey.
89. Given that many of the existing aggregate recycling facilities in Surrey have temporary permissions, without new permissions to sustain recycled aggregates production in Surrey there will be a significant capacity loss and an increase in haulage of recycled aggregate across the County to meet increasing demand. The proposed SRF at Mercer South will therefore provide a modest contribution to the County's recycling target and provide an alternative material to diminishing primary land-won materials and serve an area of the County which does not currently benefit from this type of facility. In addition, the development contributes to the objectives of National Policy on sustainable waste management by driving waste up the hierarchy, by recovering waste materials for re-use elsewhere.
90. Officers recognise that aggregate recycling facilities within operational quarries may also create an economic incentive to delay quarry restoration in favour of maximising income from the receipt and management of C,D and E waste and the sale of recycled aggregates. A key consideration in assessing planning applications for this type of facility is therefore balancing the tension between the need to restore mineral sites at the earliest opportunity and promoting the use of recycled aggregates and aggregates recycling facilities, particularly where reserves of land-won concreting aggregates may cease to be commercially viable.
91. The applicant has made it clear in this application that the primary purpose of the SRF is to ensure the timely progressive restoration of Mercers South Quarry, as such the recycled aggregate produced at the site is only as a windfall product and not a full separate aggregate recycling facility in addition to the extraction of sand and importation of materials to progressively restore the Quarry. Given the requirement under Policy MC17 of the SMP 2011, for restoration to be completed at the earliest opportunity, it is proposed to attach conditions to any grant of planning permission to enable the CPA to track the amount of material imported to the site and the amount

of recovered material exported from the site. Officers consider the applicant should maintain an accurate record of this information, which should be submitted to the CPA on the quarterly basis.

Conclusion

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92. Officers recognise the applicant's proactive approach and steps taken to ensure the timely restoration of Mercers South Quarry and to a high environmental standard in accordance with the extant permission and the approved restoration scheme. It is clear that the applicant has sought to mitigate any potential concern regarding the availability of fill material, and the SRF would enable the site to capture a greater amount of material from construction sites, to provide the reassurances required. Without the proposed SRF facility, the applicant may find it hard to source materials in the open market, as they will need to be very selective as to what types of waste is accepted which will inevitably make the site less attractive to customers, thereby reducing input rates into the void spaces.
 93. The application site is a preferred area identified within the SMP 2011 for the extraction of soft sand (Preferred Area P – Mercers Farm, Nutfield), whilst the site is not identified under Policy AR3 of the ARJDPD 2013 as a preferred mineral site for aggregates recycling, the proposal would be located within the active soft sand quarry to facilitate restoration of the site. In this respect the duration of the development would be limited to the life of the quarry, with removal required by 2035, to accord with the final restoration of the site in 2036 (as approved under planning permission Ref: TA/2019/2147 dated 10 September 2020), in accordance with the locational criteria of Policy 3 of the SWLP 2020.
 94. Whilst Officers recognise that at present recycling facilities within the County are producing circa 1.5Mtpa, it should be noted that Policy MC5 of the SMP 2011, seeks productive capacity for the supply of recycled and secondary aggregate at a rate of at least 0.9Mtpa by 2026. The proposed development would make an important contribution, albeit modest, towards maintaining the County's aggregates recycling targets, and to supply an alternative construction material in the context of diminishing primary concreting aggregate resources, within an area of the County which does not benefit from this type of facility presently, in accordance with Policies AR4 and AR5 of the ARJDPD 2013.
 95. As such Officers consider the principle of the development would comply with Policies MC1 and MC5 of the SMP 2011, Policies AR4 and AR5 of the ARJDPD 2013 and Policies 1, 3 and 10 of the SWLP 2020 in this regard. As set out above, the development would also need to meet the key development requirements of the other development plan policies, which are assessed further in the relevant sections of this report.

HIGHWAYS, TRAFFIC AND ACCESS

Surrey Waste Local Plan Part 1 – Policies 2020 (SWLP 2020)

Policy 14 – Protecting Communities and the Environment

Policy 15 – Transport and Connectivity

Tandridge District Council Core Strategy 2008 (TDCS 2008)

Policy CSP 18 – Character and Design

Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (TDLP 2014)

Policy DP5 – Highway Safety and Design

Tandridge District Council Emerging Plan: Our Local Plan 2033.

Policy TLP50 – Sustainable Transport and Travel

Policy Context

96. Paragraph 110 of the NPPF 2021, is clear that in assessing applications for development, it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Paragraph 111 of the NPPF 2021 goes on to confirm 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.
97. Criteria F of Appendix B of the NPPW 2014 states that when considering the suitability of the site in terms of traffic and access, this should include the suitability of the road network and the extent to which access would require reliance on local roads, the rail network and transport links to ports.
98. Policy 14 of the SWLP 2020, sets out the planning permission for waste development will be granted where it can be demonstrated that it would not result in unacceptable impacts on communities and environment. The term 'unacceptable impact' should be interpreted in accordance with current national and local planning policy and planning guidance relevant to, inter alia, public amenity and safety including impacts caused by fumes and vibration and cumulative impacts arising from the interactions between waste developments, and other forms of development.
99. Further, Policy 15 of the SWLP 2020, requires waste developments to demonstrate that where practicable and economically viable, development makes use of rail or water for the transport of materials and 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 development will ensure that waste is able to be transported using the best roads available, which are usually main roads and motorways, with minimal use of local roads, the distance and number of vehicle movements associated with the development are minimised, the residual cumulative impact on the road network of vehicles movements associated with the development will not be severe, there is safe and adequate means of access to the highway network and the vehicle movements associated with the development will not have an unacceptable impact on highway safety when compared against current national and local guidance. In addition, low or zero emission vehicles, under the control of the site operator, are used which, where practicable, use fuels from renewable sources.
100. Policy CSP18 of the TDCS 2008, sets out that development must not significantly harm the amenities of the occupiers of neighbouring properties by reason of noise, traffic and any other adverse effects. Policy CSP12 of the TDC 2008, requires new development to make improvements where appropriate to the existing infrastructure

network. Policy DP5 of the TDLP 2014, sets out that development will be permitted subject to meeting the requirements of all other appropriate Development Plan Policies and where the proposal, inter alia, does not unnecessarily impede the flow of traffic on the existing network or create hazards to that traffic and other road users; retains or enhances existing footpaths and cycleway links; and fully funds where appropriate, or contribute towards the cost of any measures requirement to cost effectively mitigate the significant impacts arising from the development. This is echoed in Policy TLP50 of the TDC Emerging Local Plan, in which developments are required to ensure that appropriate infrastructure measures are provided to mitigate the adverse effects of traffic and other environmental and safety impacts (direct or cumulative). Transport Assessments will be required for development proposals, where relevant, to fully assess the impacts of development and identified appropriate mitigation measures.

The Development

101. The application site forms part of the established Mercers South Quarry, where permission exists for the extraction of sand and restoration of the site using imported materials transported to the site by road, as no alternatives in terms of rail or water exist for this site. The site is well situated in terms of the strategic road network and will be accessed using the existing dedicated haul road which serves the wider Mercers South Quarry from the A25 Bletchingley Road to the south of the site. The continued maintenance of the haul road and visibility splays at the site access is secured under Condition 6 of the planning permission for the site (Ref: TA/2019/2147 dated 10 September 2020). The applicant anticipates that the majority of the HGVs would continue to travel to and from the quarry to the east along the A25, to access Junction 6 of the M25 at Godstone (approximately 9 miles from the site access).
102. The applicant has stated that the combined HGV movements associated with the wider operation of the quarry site and its restoration, together with the HGV movements associated with the proposed SRF would not exceed the existing highways limit secured under Condition 8 of planning permission Ref: TA/2019/2147 granted on 10 September 2020, and has been the operational limit at the site since 2019.
103. Condition 8 reads as follows:
- “The number of HGV movements associated with the extraction of sand and the import of inert waste materials at the Mercers South site, shall be restricted as follows:*
- No more than an average of 300 HGV movements per day Monday to Friday, not exceeding 350 movements on any single day;*
 - No more than an average of 150 HGV movements per day on Saturdays, not exceeding 240 movements on any single day;*
- The site operator shall maintain accurate records of the number of HGV vehicles accessing and egressing the site daily and shall make these available to the County Planning Authority on request.”*
104. Within these overall permitted levels, it is anticipated that the proposed SRF/recycling processes would generate an additional, 20 HGV movements per day. Appendix A6 of the Overarching Planning Statement dated July 2022, submitted with this

application provides a breakdown of HGV movements over the life of the quarry/landfill (average daily activity) and incorporates the proposed additional movements associated with the SRF. On review of this information, the application details that the existing quarry movements comprise 96 HGV movements associated with the extraction of sand at the site and 160 HGV movements associated with the importation of infill material to backfill the void space. This equates to 256 HGV movements (in and out) on average per day. With the addition of the 20 HGV movements associated with the proposed SRF, this would equate to 276 HGV movements (in and out) in total. This would be as follows:

Current number of lorries associated with sand extraction		Current number of lorries associated with infilling of the site		
Loads	Movements (inbound empty and outbound full)	Loads	Movements (inbound full and outbound empty)	Total movements
48	96	80	160	256

Proposed number of lorries associated with sand extraction		Proposed number of lorries associated with just infilling of the site		Proposed number of lorries associated with the SRF			
Loads	Movements (inbound empty and outbound full)	Loads	Movements (inbound full and outbound empty)	Inbound loads (full)	Outbound loads (with materials)	Outbound loads (empty)	Total movements
48	96	70	140	20	10	10	276

- 105. These movements would be associated with the proportion of the material which would be recycled (37,500tpa of C, D&E waste) and used to infill the site and the proportion of material that would leave the site as recycled aggregate (37,500tpa). The applicant has set out that the additional 20 HGV movements, would be well within the headroom which exists under planning Condition 8 of planning permission TA/2019/2147 dated 10 September 2020.
- 106. As set out above, the applicants stated intention is to make maximum use of back hauling to minimise the number of movements generated by the development. As the site operator also operates their own HGVs, they will have greater control over the vehicles to be able to achieve this.

Officer Assessment

- 107. The Godstone Village Association and the representations received in response to the proposal, have raised concern regarding the impact of additional HGV movements resulting from the operation of the proposed SRF. In particular concern is raised regarding the public safety (pedestrian and cyclists), the impact the additional

HGVs may have on pollution and air quality in the local area and congestion including vehicles waiting on the road and leaving detritus, alongside concerns regarding the impact on listed buildings and older properties in terms of vibrations.

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108. As set out above, the HGV movements associated with the operation of the SRF facility will remain within the overall permitted daily movements for the site, as approved under Condition 8 of planning permission Ref: TA/2019/2147 dated 10 September 2020. In this context, the impact of this level of HGV movements on the local highway, in terms of traffic generation, safety, access, noise, air quality, landscape and visual amenity were originally assessed to be acceptable and it was considered that this level of HGV movements would not have a significant adverse impact, when planning permission was granted (TA/2019/2147 dated 10 September 2020). As such, notwithstanding the proposed development, the site can already accept this level of HGV traffic, without the SRF facility in place.
 109. The County Highway Authority have stated that in view of the existing limit on HGV movements, there would be no change to the overall permitted HGV movements stipulated by Condition 8 of planning permission TA/2019/2147 dated 10 September 2020. The daily HGV movements arising from the proposed SRF combined with the existing HGV movements associated with mineral extraction and infilling would not exceed the permitted thresholds. In this regard, planning conditions are already in place on the main quarry permission to ensure that there are limits on the HGV numbers and that the access road is maintained and kept free of mud and other debris. The same conditions will be attached to any grant of planning permission for the SRF facility, ensuring that the cumulative HGV traffic does not exceed that already permitted. In addition, the site operator should continue to maintain accurate records of the number of HGV vehicles accessing and egressing the site daily and make these accessible to the County Planning Authority on request.
 110. Further to the above, Planning Enforcement/Monitoring Officers visit the site on a quarterly basis as part of Surreys routine monitoring of mineral permissions. On review of the site monitoring reports for the visits undertaken between 2021 and 2022, the Officer has noted that the approach road to the site (A25 Bletchingley Road) was clean in both directions and free from any site derived extraneous matter and no issues were noted with mud on the haul road. However, an informative will be attached to any grant of permission to remind the developer that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from unclean wheels or badly loaded vehicles. The Environment Agency would also make regular visits to the site and ensure that the site operations are in accordance with the waste permit.

Conclusion

111. Officers recognise the concerns raised within representations and by Godstone Village Association with regards to potential harm from HGV traffic associated with the proposal. However, given the number of HGVs proposed this would not cumulatively result in an increase in HGV traffic to/from the site beyond that already permitted for the site, Officers are satisfied that the proposal would result in a neutral impact compared to existing activities.

112. Officers accept the validity of the information submitted by the applicant and the proposal should not give rise to traffic levels that will exceed the current limit that is in place at the site. Conditions will be attached to any grant of planning permission to ensure the cumulative HGV traffic at the site does not exceed the permitted limit. Accordingly, the proposal is acceptable on highway, traffic and access grounds and complies with Policies 14 and 15 of the SWLP 2020, Policy CSP 18 of the TDCS 2008, Policy DP5 of the TDLP 2021 and Policy TLP50 of the TDC Emerging Local Plan, in this regard.

ENVIRONMENT AND AMENITY

Surrey Minerals Plan Core Strategy Development Management Plan 2011 (SMP 2011)

Policy MC14 – Reducing the adverse impacts of mineral development

Surrey Waste Local Plan Part 1 – Policies 2020 (SWLP 2020)

Policy 14 – Protecting Communities and the Environment

Tandridge District Council Core Strategy 2008 (TDCS 2008)

Policy CSP17 – Biodiversity

Policy CSP18 – Character and Diversity

Policy CSP21- Landscape and Countryside

Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (TDLP 2014)

Policy DP7 – General Policy for New Development

Policy DP19 – Biodiversity, Geological Conservation and Green Infrastructure

Policy DP20 – Heritage Assets

Policy DP21 – Sustainable Water Management

Policy DP22 – Minimising Contamination, Hazards and Pollution (Noise and Air Pollution)

Tandridge District Council Emerging Plan: Our Local Plan 2033.

Policy TLP32 – Landscape Character

Policy TLP33 - Surrey Hills and High Weald Areas of Outstanding Natural Beauty

Policy TLP34 – Area of Greater Landscape Value and Areas of Outstanding Natural Beauty Candidate Areas.

Policy TLP35 – Biodiversity, Ecology and Habitats

Policy TLP43 – Historic Environment

Policy TLP46 – Pollution and Air Quality

Policy TLP47 – Sustainable Urban Drainage and Reducing Flood Risk

Policy Context

113. Paragraph 174 of the NPPF 2021 is clear that planning decisions should contribute to and enhance the natural and local environment by, inter alia, protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services; and 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.

114. Paragraph 185 of the NPPF 2021 goes on to set out 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 or the wider area to impacts that could arise from the development. It adds that in doing so they should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and should avoid noise giving rise to significant adverse impacts on health and the quality of life, having regard to the Noise Policy Statement for England (NPSE). Paragraph 188 of the NPPF 2021, adds that the focus of 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), and that these regimes should be assumed to operate effectively.
115. Appendix B of the NPPW (2014) sets out a range of locational criteria that needs to be considered when determining planning applications for waste development, bearing in mind the envisaged waste management facility in terms of its type and scale. These factors are discussed further in the relevant sections below.
116. Policy 14 of the SWLP 2020 sets out that planning permission for waste development will be granted where it can be demonstrated that it would be consistent with relevant national planning policy with respect to the following key environmental assets:
- i. The protected landscapes of the Surrey Hills Area of Outstanding Natural Beauty (AONB), the High Weald AONB, the South Downs National Park, and the Kent Downs AONB.
 - ii. Sites of international or European Importance (Special Protection Area (SPA), Special Area of Conservation (SAC), RAMSAR) or biodiversity, or of national importance (Site of Special Scientific Importance (SSSI), National Nature Reserve (NNR)) for biodiversity or geodiversity where those are located within the county or could be affected by development located within the county.
 - iii. Nationally important heritage assets, including Scheduled Monuments, Listed Buildings, and Registered Parks & Gardens where those are located within the county or could be affected by development located within the county.
117. Part B of Policy 14 of the SWLP 2020 is focused on the prevention of unacceptable impacts on communities and the environment. The policy supports proposals where it can be demonstrated that it would not result in unacceptable impacts on community and the environment in terms of: public amenity and safety including impacts caused by noise, dust, fumes, odour, vibration and illumination and impacts on public open space, the rights of way network, and outdoor recreation facilities; aerodrome and airport safeguarding, including the risk of bird strikes; air quality including impacts on identified Air Quality Management Areas and Clean Zones; the water environment including flood risk and water resources taking account of Source Protection Zones; the landscape including impacts on the appearance, quality and character of the landscape; the natural environment including biodiversity and geological conservation interests; the historic landscape; land and soil resources and impacts on their use; cumulative impacts arising from the interactions between waste developments and other forms of development and any other matters relevant to the proposed development.
118. Policy CSP18 of the TDCS 2008, requires new development to reflect and respect the character, setting and local context, including those features that contribute to

local distinctiveness. Development must not significantly harm the amenities of occupiers of neighbouring properties by reason of overlooking, overshadowing, visual intrusion, noise, traffic and any other adverse effect. This is echoed in Policy DP7(6) of the TDLP 2014 which seeks to safeguard existing and secure good standards of new amenity for all current and future occupants of land and buildings. Part 6 of this policy seeks to ensure that proposed development does not significantly harm the amenity of neighbouring properties by reason of pollution (noise, air or light), traffic, or other general disturbance. This is echoed in Policy TLP46 of the TDC Emerging Local Plan and it is accepted that planning conditions may be used to manage and mitigate the effects of pollution and/or disturbance arising from development, in order to ensure impacts on the environment and residential amenity are kept within acceptable limits and where possible reduced.

Landscape and Visual Impact

119. Criteria C in Appendix B of the NPPW 2014, sets out that in terms of landscape and visual impacts considerations will include (i) the potential for design-led solutions to produce acceptable development which respects landscape character; and (ii) the need to protect landscapes or designated areas of national importance including Areas of Outstanding Natural Beauty.
120. Policy CSP21 of the TDCS 2008, requires the character and distinctiveness of the District's landscapes and countryside to be protected. New development will be required to conserve and enhance landscape character.
121. Policy TLP32 of the TDC Emerging Local Plan details that all proposals for development in the District will protect and enhance the key landscape features and visual sensitivities of the landscape character areas identified in the Surrey Landscape Character Assessment 2015 and the Tandridge Landscape Capacity and Sensitivity Assessment 2016-18, or subsequent updates where they apply. Policy TLP33 of the same, states that any planning applications within the AONB and that influence its setting will need to demonstrate that the development has; i) sought to conserve and enhance, the special landscape character, heritage and distinctiveness, sense of place of the locality and where appropriate, relative tranquillity; ii) would safeguard public views out of and into the AONB and not adversely impact skylines and slopes; iii) is designed to take advantage of existing landscape features and tree screening; and iv) has met the provisions of the most up to date AONB management plan for the area.
122. Policy TLP34 of the TDC Emerging Local Plan also sets out in respect of AONB and Areas of Great Landscape Value (AGLV), that these areas will be retained until a review of the Surrey Hills AONB has been completed. The AGLV and AONB candidate areas are designated on the Policies Map and reflect how land has been categorised for the purposes of the forthcoming review. AONB candidate areas have been shown to meet Natural England's criteria of 'Natural Beauty' for inclusion in the AONB⁹.

⁹ A formal AONB boundary review is currently underway by Natural England which will consider the case for extending the existing AONB and comments are being invited on this. The process of reviewing the boundary is still at an early stage therefore Officers do not attribute any weight to the possibility that this site might in the future be included in the AONB.

The Development

123. The application site and wider quarry is not covered by any national or local landscape designations. The north-eastern boundary of the permitted quarry, marked by the Redhill Brook, borders the southern edge of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the eastern most point of the site adjoins the Surrey Hills Area of Great Landscape Value.
124. The application site and quarry are situated within the Holmethorpe Pits and Mercers Park Landscape Character Area (UE9) as set out in the Surrey Landscape Character Assessment: Tandridge District, dated April 2015¹⁰. This character area is defined by the built-up areas of Redhill and South Mersham to the west and north, the M23 motorway to the east and A25 road to the south. The key characteristics of this area are that it forms part of the Greensand Valley which runs broadly east-west along the southern foot of the North Downs ridge scarp slope. The original undulating landform has been significantly altered by human intervention. The land use consists of large areas quarried for sand, currently at various stages of extraction and restoration several of which now form lakes, which provide recreation at Mercers Park Country Park, nature reserves and fishing lakes. Areas of arable and pastoral fields are interspersed between the pits.
125. Mercers South Quarry is an established quarry with landscape mitigation measures secured under the Conditions of its operation, including soil storage mounds around the perimeter of the quarry. The permission for the working of the quarry is supported by an approved Landscape and Ecology Management Plan (LEMP) which includes the aim of achieving effective landscape mitigation of the quarry providing screening and landscape setting appropriate to the character.
126. The proposed SRF would occupy an area of 0.6ha (excluding access) (approximately 1.15% of the total quarry area) within Phase 1 of the existing permitted quarry, from which sand has already been extracted. The application area is located in close proximity to the built site compound comprising the site office, car parking and weighbridge. Site access would be via the existing dedicated internal haul road for the Quarry, from the A25 to the south.
127. The Overarching Planning Statement dated July 2022, states that the Phase 1 ground level at which the SRF would operate is 4m below the prevailing ground level outside the quarry. The quarry, including the proposed SRF area, is also screened by grass-seeded soil mounds of approximately 2-3m in height above the prevailing ground level. The main plant operating within the SRF would be a mobile screener (4.4m high) and a mobile crusher (3.2m high). Material stockpiles (recycled aggregate for export) would be up to 4m in height.
128. Planning permission Ref: TA/2013/1799 (and carried forward into Ref: TA/2019/2147 dated 10 September 2020) requires, the site to be progressively restored in four phases working from east to west. Each phase would be progressively planted to re-establish elements of the local field pattern and provide new and enhanced areas of woodland. The agricultural land use would be re-instated following restoration. Final restoration includes a number of the enhancements referred to in the Surrey Minerals

¹⁰ [Surrey-LCA-2015-TANDRIDGE-Report.pdf \(surreycc.gov.uk\)](#)

Plan 2011 Site Restoration Supplementary Planning Document, notably new woodland and the reinstatement of historic hedgerows and public rights of way network.

Officer Assessment

129. The proposed SRF would be located in close proximity to the existing built development and facilities, in the Quarry. This is the furthest point in Phase 1 from the protected landscape of the Surrey Hills AONB to the north. The SRF would operate within the existing quarry void where sand has already been extracted. The proposed location is where the existing sand screening operation was situated when mineral extraction first commenced. In terms of scale, the proposed crusher would be smaller than the sand screeners currently in place at Mercers South Quarry (located in Phase 3) and the materials screener would be similar in size to the main sand screener.
130. Natural England, have raised no objection to the proposal, concluding that it will not have a significant adverse impact on designated sites. However, it is raised that the proposed development is located within an area which Natural England is assessing as a boundary variation to the Surrey Hills AONB. Whilst this assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the proposal. Natural England consider the Surrey Hills to be a valued landscape in line with paragraph 174 of the NPPF 2021. In this regard, paragraph 176 of the NPPF 2021 states that development in the setting of the AONB should be sensitively located and designed to avoid or minimise impacts on the designated areas.
131. Officers consider that locating the SRF within an area of the Quarry where there are other built elements that form part of the context of an operating mineral site, seeks to minimise the impact on the AONB and its setting. An assessment of the landscape and visual impacts of the proposal on this area should therefore be undertaken, with opportunities to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with relevant development plan policies. The applicant has provided an assessment of impact on the landscape character within the Overarching Planning Statement outlining that the Environmental Statement which accompanied TA/2013/1799 included a Landscape and Visual Impact Assessment concluding that, owing to the combination of a landform, vegetation cover, temporary bunding and landscape mitigation, visual impact of the operations throughout the life of the quarry would not be significant.
132. The County Landscape Architect (CLA) has commented on the application and notes that the proposed SRF operation is unlikely to be more visually intrusive in operation than the existing permitted quarrying activities. However, the inclusion of the operation will delay the restoration of a 0.6ha section of Phase 1 of the quarry. Overall, the CLA considers there may be some public views of the SRF in operation and associated HGV traffic on the haul road, from the Public Rights of Way (PRoWs) on the higher ground to the south (e.g Footpath 187) and long range views from the North Downs Ridge (Surrey Hills AONB) to the north. It should be noted that HGVs already access the site as such Officers consider the impact from HGVs in terms of visual impact to be neutral from this proposal. With regard to views from PRoWs, any

views of the plant used in the SRF would be seen within the wider context of the operational Quarry.

133. In response to the initial concerns of the CLA, the applicant has submitted a cross section drawing of the proposed SRF showing the facility at its working level, the height of the stockpiles and the height of the proposed machinery (Drawing No: MS-SR-4 Rev 00, Illustrative Section – Soils Recovery and Aggregate Recycling (SRF), dated 16.01.23). This drawing shows the relationship in height between the ground level within the quarry void, the material stockpiles, vehicular plant (screener and crusher), screening mounds and the prevailing ground levels outside the void. On review of the drawing the operational ground level would be 3m below the prevailing ground level to the west, and 4m below the prevailing ground level to the east. As such, this drawing demonstrates that in the case of long range views, the limited scale of the site and the limited height of the plant proposed to operate within the SRF combined with the below ground level operation and temporary screening mounds means the operations would not form a prominent part of the overall vista.
134. The CLA, concludes that the landscape and visual harm for this proposal is therefore limited by the mitigating factors outlined. Should permission be granted it is recommended that conditions are attached to any grant of planning permission, which control the operational ground level for the SRF facility, the maximum height of the stockpiles, and the retention and maintenance of the existing temporary screening mounds until the operation of the SRF ceases and the land is restored. The Surrey Hills AONB Planning Advisor was also invited to comment on the application, and confirms that there are no protected landscape views which would be impacted by the proposed changes to the long established mineral extraction site.
135. Further, the County Enhancement Officer has raised no objection to the installation and use of the proposed SRF. The Enhancement Officer notes that the proposal will result in a delay to the restoration of a small area of the site, however the facility will bring in additional recovery/fill material to secure and speed up the restoration overall.

Conclusion

136. Officers consider that the operation of the SRF within the quarry void set at a lower level than the surrounding ground levels, combined with the existing quarry screening mounds would be limited in terms of both long distant and short distant views of its operation, and would also be seen in the context of an operational quarry, and as such would not give rise to significant impacts with respect to visual impacts, subject to the conditions as set out above being attached to any grant of planning permission. With regards to landscape character, the application area is a small part of the overall Quarry area and given its position within the Quarry and its size, Officers consider it would not have a significant adverse impact on either the local or wider landscape character including the setting of the AONB.
137. Furthermore, the operation of the SRF is limited to the duration of the working of the quarry and will be restored in accordance with the agreed restoration scheme for the site. Whilst the proposal will result in a delay to the restoration of a small area of phase 1, Officers are satisfied that the proposal is appropriately situated within the active quarry and given the presence of screening mounds which will be retained for

the duration of the SRF, as secured by condition, the proposal would not result in an unacceptable impact on the landscape. Officers are therefore satisfied that the proposals would not conflict with the aims and objections of the development plan Policy 14 of the SWLP 2020, Policy CSP21 of the TDCS 2008 and Policies TLP32 and TLP34 of the TDC Emerging Local Plan, alongside the national policy guidance contained in the NPPF 2021 and NPPW 2014, in this regard.

Cultural Heritage

138. Paragraph 189 of the NPPF 2021 states that heritage assets range from sites and buildings of local historic value to those of the highest significance and should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Paragraph 194 of the NPPF 2021 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Paragraph 195 of the NPPF 2021, goes on to explain that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of 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.
139. When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 199 of the NPPF 2021, states that great weight should be given to the asset's conservation (and the more important the 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.
140. Paragraph 202 outlines that "Where a development 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 including, where appropriate, securing its optimum viable use". Paragraph 203 of the NPPF 2021 deals with non-designated heritage assets requiring the effect of an application on their significance should be taken into account in determining a planning application and that in weighing application that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
141. Criteria E of Appendix B of the NPPW 2014 states that in testing the suitability of sites the CPA should consider the potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting.
142. Paragraph 5.4.2.3 of the SWLP 2020 recognises that heritage assets in Surrey are an irreplaceable resource and should be conserved in a manner appropriate to their significance.
143. Policy DP20 of the TDLP 2014 covers heritage assets. It states that there will be a presumption in favour of development proposals which seek to protect, preserve and

wherever possible enhance the historic interest, cultural value and architectural character, visual appearance and setting of the District's heritage assets and historic environment. The policy goes on to set out the following:

- a) Only where the public benefits of a proposal significantly outweigh the harm to, or loss of a designated heritage asset or its setting, will exceptional planning consent be granted. These benefits will be proportional to the significance of the asset and to the level of harm or loss proposed.
 - b) Where a proposal is likely to result in substantial harm to, or loss of, a designated heritage asset of the highest significance granting of permission or consent will be wholly exceptional.
 - c) In all cases the applicant will be expected to demonstrate that all reasonable efforts have been made to either sustain the existing use, find viable alternative uses, or mitigate the extent of the harm to the asset; and where relevant the works are the minimum necessary to meet other legislative requirements.
 - d) With the granting of permission or consent the Council will require that the works are sympathetic to the heritage asset and/or its setting and in the case of a Conservation Area, the development conserves or enhances the character of the area and its setting, including protecting any existing views into or out of the area where appropriate.
144. Policy TLP43 of the TDC Emerging Local Plan, requires applicants to make every effort to liaise with Surrey County Council Conservation Team and Historic England when drawing up proposals at the earliest opportunity to limit the prospect of any objection, in accordance with policies of the wider development plan including Policy DP20 and any updates.

Listed Buildings

145. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Act") imposes a "General duty as respects listed buildings in exercise of planning functions." Subsection (1) provides: "*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*" This legislation has been assessed by the Courts on various occasions, invariably finding that, if there would be harm to a listed building or its setting, that harm must be given considerable importance and weight and not treated merely as a 'material consideration' to which decision-makers can attach such weight as they think fit. Section 66 (1) gives rise to a strong presumption against the grant of planning permission, however that presumption is rebuttable and it is for the planning authority to decide how much weight should be given to the harm it identifies. The courts have confirmed that the process set out in the NPPF 2021 for assessing the impact on heritage assets corresponds with the duty set out in Section 66 of the Act.
146. The proposal would not result in any direct impact on listed buildings themselves by either altering or demolishing them. As such, it is appropriate to assess whether this proposal would harm the setting of any of the listed buildings and thereby affect their significance.
147. The setting of a Heritage Asset is defined in the NPPF 2021 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. Historic England's Good Practice Planning Note (3)¹¹ explains that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way which an asset is experienced in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity and the understanding of the historic relationship between places.

148. Planning permission was granted for the extraction and screening of approximately 4.1 million tonnes of sand over a 16 year period. As part of the planning application (Ref: TA/2013/1799 dated 12 August 2014), an Environmental Impact Assessment (EIA) was undertaken, and an Environmental Statement submitted which included a 'Cultural Heritage Assessment'. The Cultural Heritage Assessment concluded during the determination of the application and subsequent amendments to the permission, that all cultural assets in proximity to the quarry had been correctly identified and that the proposed development would not affect the fabric or curtilage of the listed buildings or have an unacceptable impact on their setting.
149. In terms of this application, the proposed SRF would be located within the active quarry, inside existing bunds and adjacent to the existing built site compound and internal vehicular access, it would not extend into land beyond Phase 1 of the quarry. The proposed activity would take place some 250m from the nearest Listed Building, Mill cottage which is a Grade II 17th Century property which lies to the east of the site, close to the M23. According to the 'Cultural Heritage Assessment' undertaken with respect to the original permission for the working of the quarry (Ref: TA/2013/1799 dated August 2014), Mill Cottage is on slightly elevated ground 200m east of the quarry and 130m from the access route, however its setting has been completely compromised by the M23 motorway that passes within 50m to the east.
150. The following listed buildings and structures are within 500m of the application site, The Glebe House (Grade II, mid 18th century), Leather Bottle Cottage (Grade II, dendrodated to 1549/1550), Charmans Cottage (Grade II, dendrodated to 1558/59) and Peytons Cottages (locally listed, late 18th/early 19th centuries). The settings of these buildings vary between relatively enclosed sites such as The Glebe House and Mill Cottage to more open surroundings on the edge of common land as in the case of Leather Bottle Cottage and Charmans Cottage.
151. The County Historic Buildings Officer (CHBO) has commented on the proposal and notes that the application site makes no contribution to the setting of any of the aforementioned buildings except potentially from noise from the quarry. However, as covered in the relevant section of the report below, the CHBO is satisfied that the proposed noise levels from the SRF will not exceed those already agreed for the established quarry working. As such, there is no impact on the historic built environment from this application. In this regard, the CHBO concludes that there will be no material impact on the special interest of the listed buildings or the significance of the locally listed buildings in accordance with paragraphs 195 and 199 of the NPPF 2021, in this regard.

¹¹ [The Setting of Heritage Assets \(historicengland.org.uk\)](http://historicengland.org.uk)

Archaeology

152. Phase 1 of the quarry, and proposed location of the SRF facility, has already been stripped and excavated in accordance with the requirements of the 'Written Scheme of Investigation for Archaeological Monitoring and Excavation dated July 2015' approved under planning permission Ref: TA/2013/1799 dated 12 August 2014 and included in Condition 22 of planning permission Ref: TA/2019/2147 dated 10 September 2020.
153. In this regard, the County Archaeological Officer (CAO) has raised no concerns regarding the siting of the SRF facility from an archaeological perspective. The CAO notes that the proposed development is sited wholly within areas that have previously been subject to conclusive archaeological investigations and as such no further assessment work is required.

Conclusion

154. Officers recognise there are heritage assets within proximity to the application site, as discussed above. Officers are satisfied that the proposal would not directly harm or destroy any listed buildings nor have an impact on the setting of these listed building as a result of the siting and operation of the proposed development. As such, Officers consider that the proposed development meets the requirements of the development plan policy with regard to Policy 14 of the SWLP 2020, Policy DP20 of TDLP 2014 and Policy TLP43 of the TDC Emerging Local Plan, alongside the requirements set out in the national guidance NPPF 2021 and the NPPW 2014 and the requirements set out in Historic England's good practice guide.

Noise

155. As outlined above, paragraph 185 of the NPPF 2021, sets out that planning decisions should 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.
156. The Noise Policy Statement for England (NPSE) 2010¹², sets out the long term vision of Government Noise Policy. This vision seeks to 'promote good health and good quality of life through the effective management and control of noise within the context of Government policy on sustainable development' and is supported by three key aims:
- Avoid significant adverse impacts on health and quality of life;
 - Mitigate and reduce to a minimum other adverse impacts on health and quality of life; and
 - Where possible, contribute to the improvement of health and quality of life.
157. These aims require that all reasonable steps be taken to avoid, mitigate and minimise adverse effects of noise on health and quality of life whilst also taking into account the guiding principles of sustainable development, including social, economic, and environmental and health considerations. The NPSE applies to all forms of noise including environmental noise, neighbour noise and neighbourhood noise but does not apply to noise in the workplace (occupational noise). The thresholds defined in the NPSE, to assist in the consideration of whether noise is likely to have a 'significant adverse' or 'adverse' effects on health and quality of life

¹² [Noise Policy Statement for England \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/424222/noise-policy-statement-for-england-2010.pdf)

are; No Observed Effect Level (NOEL), Lowest Observed Adverse Effect Level (LOAEL), Significant Observed Adverse Effect (SOAEL)¹³. Regarding the numerical definition of these levels, it is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, receptors and at different times.

158. Criteria J of Appendix B of the NPPW 2014, requires consideration of the proximity of sensitive receptors, including noise and vibration of goods vehicle traffic movements to and from a site.
159. The National Planning Practice Guidance (NPPG) at paragraph 019 (ID: 27-019-20140306) sets out that those making development proposals, including those for related similar processes such as aggregates recycling and disposal of construction waste, should carry out a noise impact assessment, which should identify all sources of noise and, for each source, take account of the noise emission, its characteristics, the proposed operating locations, schedules and duration of work for the life of the operation, and its likely impact on the surrounding neighbourhood. Paragraph 020 of the NPPG (ID: 27-20140306) goes on to set out that Mineral Planning Authorities should take account of the prevailing acoustic environment and in doing so consider whether or not noise from the proposed operations:
- Give rise to a significant adverse effect;
 - Give rise to an adverse effect; and
 - Enable a good standard of amenity to be achieved.
160. In line with the explanatory note of the NPSE, this would include identifying whether the overall effect of the noise exposure would be above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation.
161. Policy DP22 of the TDLP 2014, requires noise generating forms of development or proposals that would affect noise-sensitive development to be accompanied by a statement detailing potential noise generation levels and any mitigation measures proposed (such as containment of the noise generated, screening barriers or restrictive activities/hours of operation) to ensure that all noise is reduced to an acceptable level. Where a development proposal is able to demonstrate that acceptable noise levels will be achieved, the application will be supported.

The Development

162. The operation of the SRF will comprise the use of a Terex Finlay J-960 jaw crusher and a Terex Finlay 873 screen with associated loading shovel for the input of material into the facility. There will be no additional HGV movements into or out of the site above those already permitted.
163. The proposed SRF will operate within the permitted working hours of the site as stipulated in Condition 3 of planning permission Ref: TA/2019/2147 dated 10 September 2020, as being, 0700-1800 hours Monday to Friday; and 0700-13000

¹³ NOEL – This is the level below which no effect can be detected. LOAEL – This is the level above which adverse effects on health and quality of life can be detected. SOAEL – This is the level above which significant adverse effects on health and quality of life occur.

hours Saturdays. There will be no operation of the soils recovery facility on Sundays, Public Holidays, Bank Holidays or National Holidays.

164. Planning permission Ref: TA/2019/2147 dated 10 September 2020, is the current permission for the site, and contains the following conditions relating to noise:

“17. When measured at, or recalculated as at, a height of 1.2 m at least 3.5 m from a noise sensitive building, the level of noise emitted as a result of any activity or operation at the site and associated with the development hereby permitted shall not exceed 55 LAeq for any 0.5 hour period.

18. During the period of essential site preparation and bund construction the level of noise arising from such construction, when measured or recalculated as at, a point at least 3.5 m from any noise sensitive property during any 0.5 hour period shall not exceed 70 LAeq between 0800 to 1600 hours Monday to Friday and 65 LAeq from 0900 to 1300 on Saturdays. No bund construction work shall be carried out outside these times.

19. All plant and company owned HGVs operating at the site shall be fitted with reversing alarms which do not emit a warning noise that could have an adverse impact on residential amenity.”

165. The applicant has submitted a Noise Assessment Note (dated June 2022) in support of the current application. The noise calculations were undertaken at twelve locations, representative of the nearest noise sensitive receptors to the site. The Assessment predicts the noise from the proposed SRF activities at nearby sensitive receptors. The calculated predicted noise level has then been added to noise generated by the existing operations on the site to predict the total noise levels at nearby receptors from the site.
166. The applicant sets out that the Assessment has been based on a ‘worst case’ scenario, with all operations taking place at the closest practical position to each dwelling and the plant and machinery working 100% of each hour. Mitigation measures in the form of the existing soil storage mounds were included in the site noise calculations.
167. The Noise Assessment concludes that based on the worst case scenario with the SRF, noise levels would, increase at all identified receptors. As set out above, the Assessment explains that the calculations are based on the worst case scenario and the likelihood is that this situation will not occur in practice.
168. A comparison of the calculated noise levels at the nearest dwellings and the site noise limits is shown in table 4 below.

Site Noise Calculation Receiver Location	Calculated Site Noise Level dB LAeq, 1 hour, free field		Site Noise Limit dB LAeq, 30 min free field
	Soils Recovery Facility	Overall Site Noise (inc. all ongoing permitted site activities)	
1. Peyton Cottage	52	55	55
2. New Cottages	43	54	
3. Canal Cottage	38	55	
4. Mill Cottage	44	51	
5. Bletchingley Road	41	46	
6. Mercers Farm	39	55	
7. Leather Bottle Cottage	39	55	
8. Halfway House	42	47	
9. South Lodge	41	44	
10. Nutfield Court	45	48	
11. Glebe Cottage	49	52	
12. Puckshaw Cottage/Puckshaw House	48	53	

Table 4 – Findings of the applicants Noise Assessment, taken from Page 5 of the Noise Assessment Note dated June 2022.

Officer Assessment

- 169. The total noise levels have been compared to the requirements of Condition 17 of planning permission Ref: TA/2019/2147 dated 20 September 2020, as set out above. The report finds that the requirements of the planning condition have been met, however at a number of locations the predicted noise level is 55dB LAeq, which is the maximum allowable noise limit at the site as approved under Condition 17.
- 170. The Surrey County Council Noise Guidelines dated January 2020, sets out that during normal working hours (weekdays between 07:00 and 19:00 hours), the differences between the rating level and background sound level should be no greater than +5dB. A lower difference may be appropriate at other sensitive times of the day or if other industrial noise sources are already present in the area and the affect the same Noise Sensitive Receptor (NSR). In the case of Mercers South Quarry, the background sound level has been assessed in the context of the prevailing quarry operations. As such a noise limit of 55dB LAeq has already been considered the appropriate allowable noise limit in the context of this site, to enable a good standard of amenity to be maintained at the nearest sensitive receptors.
- 171. The County Noise Consultant (CNC) has commented on the findings of the Noise Assessment. The CNC is in agreement with the prediction methodology employed in the assessment (based on British Standard (BS) 5228-1:2009+A1:2014). The predictions are based on a number of worst case assumptions, with all equipment operating simultaneously on the closest boundary of the site to each receptor location. As such, although the predicted noise levels are close to the existing limits, they represent a scenario that is unlikely to actually occur and are likely to represent an overestimate of the noise levels at nearby receptors.

172. On this basis, the CNC considers that the proposed development is unlikely to result in a noise impact any greater than those already permitted, however it is recommended that the existing conditions are brought forward to apply to the whole site, including the SRF. In addition, as the predicted noise levels are close to the previously agreed planning criteria, it is recommended that an additional planning condition is attached to any grant of planning permission to allow the CPA to request noise monitoring be carried out at the CPA's request to check compliance with the approved site noise level of 55dB L_{Aeq} .
173. Officers recognise that the application site forms part of an existing established quarry, where screening mounds of approximately 2-3m in height exist to the east and south of the proposed facility. The SRF is also proposed to operate within the existing operational hours for the site, reducing the impact of additional noise impacts due to activities occurring more often or during sensitive periods.
174. Taking into consideration the advice received, the proposed SRF is unlikely to have a significant adverse effect on the acoustic environment of the locality and a good standard of amenity can be achieved at the identified sensitive receptors in proximity to the site, subject to the imposition of conditions to maintain the acceptable site noise level of 55dB L_{Aeq} . No additional mitigation measures are recommended. Further, Officers recognise that the vehicle movements associated with the proposed SRF facility have not been subject to noise assessment, as the facility would not result in additional HGV traffic over and above that already permitted at the Mercers South Quarry site.

Conclusion

175. The applicant has assessed the noise implications of the addition of the SRF operation and its use in conjunction with the wider quarry operations, with no additional mitigation measures proposed other than the existing screening mounds to the east and south of the proposed SRF area. The CNC has advised they are satisfied with the proposal and have recommended noise control conditions to be attached to any grant of planning permission for the proposed operation.
176. Taking into consideration the advice received and having regard to the above paragraphs, Officers consider that the development would not have an unacceptable noise impact on the amenity over and above the existing noise from the quarry operations. Given predicted noise levels are close to the acceptable noise level for the site, Officers consider that the further controls as recommended by the CNC are appropriate and will be attached to any grant of planning permission for this development. Officers conclude that the proposal is in accordance with the relevant development plan policies, Policy 14 of the SWLP 2020, DP22 of the TDLP 2014, and Policy TLP46 of the TDC Emerging Local Plan alongside the requirements set out in national guidance, NPPF 2021, NPPG and the NPSE 2010 in this regard.

Air Quality and Dust

177. The proposal would involve elements that would give rise to air quality and dust issues. These include the operation of the plant and machinery to crush and screen C,D and E waste for the purpose of screening out soil for restoration and producing recycled aggregate for re-sale.
178. Paragraph 174(e) of the NPPF 2021 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 and that development should, where possible, help to improve local environmental conditions such as air quality.

179. Paragraph 211 of the NPPF 2021 states that when considering proposals for mineral extraction, mineral planning authorities should ensure that there are no unacceptable adverse impacts on the natural and historic environment and human health, taking into account the cumulative effect of multiple impacts from individual sites and/ or from a number of sites in the locality; and ensure that any unavoidable dust and particle emissions are controlled, mitigated or removed at source.
180. The NPPG also provides guidance on air quality and dust. Paragraph 005 (Reference ID-32-005-20191101) 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 (Reference ID: 32-006-20191101) 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.
181. Specifically, for minerals development, paragraph 023 (Reference ID- 27-0023-20140306) of the NPPG states that where dust emissions are likely to arise, mineral operators are expected to prepare a dust assessment study to establish the baseline conditions, site activities that could lead to dust emissions without mitigation, parameters that could increase potential dust impacts, recommend mitigation measures; and propose monitoring and reporting mechanisms of dust emissions to ensure compliance with environmental standards.
182. Criteria G of the NPPW 2014, requires consideration of 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 and well-maintained and managed equipment and vehicles.
183. Policy MC14 of the SMP 2011 seeks to ensure minerals related development does not lead to a significant adverse impact with regards to air quality and dust. Policy 14 of the SWLP 2020, requires development to not result in an unacceptable impact on public amenity and safety including impacts caused by dust, fumes or odour.
184. Policy DP22 of the TDLP 2014, sets out that development will be permitted provided it would not: have an adverse impact on health, the natural or built environment or amenity of existing or proposed uses by virtue of odour, dust and/or other forms of air pollution; or be likely to suffer unacceptable nuisance as a result of proximity to existing sources of odour, dust and/or other forms of air pollution.

Vehicle Emissions

185. As outlined above the number of vehicle movements associated with the proposed SRF will not exceed the level already permitted for the operations at Mercers South Quarry.

186. The Institute of Air Quality Management (IAQM) and Environmental Protection (EPUK) guidance “Land Use Planning & Development Control: Planning for Air Quality” (2017) sets out that an air quality assessment will be required to accompany a planning application where there is a change of HGV flows of more than 100 annual average daily traffic movements. As this proposal would not result in a change in HGV movements, an air quality assessment specifically for HGV movements is not required.

Dust

187. A number of good practice measures are already in practice at Mercers South Quarry to prevent dust emissions, as secured under planning permission Ref: TA/2019/2147 dated 10 September 2020. This includes a Dust Action Plan and Dust Monitoring Scheme dated July 2015. These measures include:
- Staff training in respect of causes and prevention of dust;
 - Dust containment (to minimise dust emissions through the use of appropriate equipment and systems)
 - Dust suppression (to control dust emission by use of a wheelwash, water sprays/bowser, mechanical sweeper etc, noting that the extracted sand remains moist after dewatering and that fill material consists predominately of cohesive clays) and;
 - Dust management (where the potential for dust emissions to occur is reduced through effective control of site operations such as reducing drop heights, controlling vehicle speeds and reducing or suspending operations during very dry, windy conditions).
188. The recovery of soils and recycling activities would be undertaken within the context of the dust mitigation measures already in place at Mercers South Quarry. The plant and associated material stockpiles would be located within the active quarry, inside existing bunds and adjacent to the existing internal vehicular access. As set out above the nearest residential property is located some 250m to the east of the application site, at Mill Cottage, close to the M23.
189. A Dust and Air Quality Assessment dated July 2022, has been submitted in support of the application. The Assessment considers the potential impacts of the proposal on Air Quality Objectives and ‘nuisance’ or ‘disamenity’ dust arising from the proposed SRF.
190. Dust is generally regarded as particular matter up to 75µm (micron) diameter can be considered in two categories. Fine dust, essentially particles up to 10µm, is commonly referred to as PM₁₀ and PM_{2.5}, and is measured to agreed standards and forms as part of the Air Quality Objectives. Coarser dust (essentially particles greater than 10µm), is, generally regarded as ‘disamenity dust’ and can be associated with annoyance, although there are no official standards for dust annoyance.
191. The common pathway for dust propagation is by air. Dust propagation depends on particle size, wind energy and disturbance activities. Large dust particles generally travel shorter distances than small particles. It is often considered that particles greater than 30µm will largely deposit within 100m of sources, those between 10-30µm will travel up to 250-500m and particles less than 10µm will travel up to 1km from sources.

Air Quality Objectives

192. Tandridge District Council (TDC) are responsible for air quality within the area in which the proposed development is located. In TDC's Air Quality Annual Status Report (ASR) 2021, it is stated that there is no continuous monitoring for PM₁₀ or PM_{2.5} within the District, and modelling by the Surrey Air Alliance (SAA) sets out that most areas in the District are compliant with the WHO guideline limit values for PM₁₀ or PM_{2.5}. In addition, TDC have no Air Quality Management Areas (AQMA) within the District, the nearest AQMA to the site is the Reigate and Banstead Borough Council AQMA no.1, which runs along the M25.
193. In order to assess the background concentration of PM₁₀ or PM_{2.5}, the submitted Assessment uses nationally available data from Defra, which are determined for every local authority in the UK at a 1x1km grid square resolution. The Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning dated May 2016 (v1.1)¹⁴, sets out that *"if the long term background PM₁₀ concentration is less than 17 µg/m³ there is little risk that the process contribution would lead to an exceedance of the annual mean objective and such a finding can be put forward qualitatively without the need for further consideration, in most cases"*.
194. The Assessment concludes that the predicted background level concentration of PM₁₀ is less than 17µg/m³, as such there is little risk that the proposed SRF would lead to any exceedance of the annual mean objective of 40µg/m³. In addition the background concentration of PM_{2.5} in the vicinity of the site is 9.62 µg/m³ and would therefore not lead to any exceedance of the annual mean objective of 20µg/m³.

Disamenity Dust

195. The main potential effect from mineral sites is disamenity or nuisance due to dust deposited on surfaces. For a sand and gravel quarry, the Assessment indicates that nuisance effects of dust arising from such sites may extend up to 250m from the source although, residents concerns are most likely to be experienced within 100m of the dust source. The IQMA Guidance on the Assessment of Mineral Dust Impacts for Planning dated May 2016 (v1.1), states that dust impacts will mainly occur within 250m of the operation of sand and gravel quarries and within 400m of the operation for hard rock quarries.
196. The Assessment has referred to the screening flow chart in the IQMA Guidance on the Assessment of Mineral Dust Impacts for Planning dated May 2016 (v1.1). For facilities processing sand and gravel, the flow chart indicates that a detailed assessment can be scoped out where there are no sensitive receptors within 250m of the facility and there are no special circumstances (such as existing high PM₁₀ concentrations). Figure 3.1 of the applicants Assessment shows that there are no receptors within 250m of the proposal SRF facility. The IQMA Guidance on the Assessment of Mineral Dust Impacts for Planning dated May 2016 (v1.1), also notes sensitivity to dust for ecological receptors. The report indicates that there are nationally designated ecological receptors within 250m of the proposed development.

¹⁴ [mineralsguidance_2016.pdf \(iaqm.co.uk\)](https://www.iaqm.co.uk/mineralsguidance_2016.pdf)

As such a detailed assessment for disamenity dust from the SRF is not required for this application and disamenity dust impacts from this area on surrounding receptors can be deemed insignificant.

197. In accordance with the applicants existing permission, perimeter dust monitoring is undertaken. The results from directional sticky pad dust monitors show that 89.9% of values from November 2016 to May 2022 were 'very low' or 'low', with 92/7% below the site specific threshold set out in the approved Dust Monitoring Scheme. Results from the depositional dust monitoring at four locations in 2021 and 2022 have also been well below the site specific threshold set within the approved Dust Monitoring Scheme.
198. As discussed above mitigation measures within the existing approved Dust Action Plan (DAP) and Dust Monitoring Scheme (DMS), include general mitigation measures which are recommended in the Assessment to be appropriate for the SRF facility. The DAP is a documented site-specific operational plan to prevent or minimise the release of dust from the site and a DMS is a programme of ongoing dust monitoring to validate the outcome of the assessment and to check on the continuing effectiveness of control/mitigation measures. This includes additional measures such as water sprays to be used during dry conditions, all plant and machinery should be appropriately maintained to avoid dust generation relating to vehicle movements, mobile plant with upward or sideways exhausts should be used, and site haulage kept to made roads.

Officer Assessment

199. Officers recognise that the proposed SRF facility is located within a discrete area of the existing quarry, 4m below ground level. There are no sensitive residential or ecological receptors identified within 250m of the application site and the site is not located in a sensitive area in terms of air quality, as such a detailed assessment of the impact of dust is not necessary in this case and dust impacts as a result of the proposal are deemed insignificant.
200. The County Air Quality Consultant (CAQC) has commented on the proposal, and agrees with the applicant's assertion that the proposed development is unlikely to have significant dust effect.
201. Further, the Contaminated Land Officer at Tandridge District Council has commented on the proposal. Whilst no concerns are raised it is recommended that a suitable water spray-based dust abatement system is secured by condition attached to any grant of planning permission to minimise dust emissions from the site.
202. Taking the above advice into consideration, Officers consider that to ensure that dust arising from the proposed SRF facility is appropriately managed, a condition should be attached to any grant of planning permission to require the approved Dust Action Plan and Dust Monitoring Scheme to be updated to include the SRF facility thereby addresses the Contaminated Land Officer's comments.

Conclusion

203. Having regard to the above, Officers are satisfied the proposal would not give rise to significant adverse impacts with regards to air quality. In terms of dust, Officers consider that subject to a condition requiring the update to the existing dust

management processes on the site to take account of the proposed SRF facility, that suitable mitigation measures would be in place to control dust that could arise from this proposal and the development satisfies the requirements of the development plan policy MC14 of the SMP 2011, Policy 14 of the SWLP 2020 and Policy DP22 of the TDLP 2014, and Policy TLP46 of the TDC Emerging Local Plan, alongside the requirements of the NPPF and NPPW, in this regard.

Ecology and Biodiversity

204. Paragraph 174(a) and (b) of the NPPF 2021, 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. Paragraph 180 of the NPPF 2021, sets out that when determining planning applications, local planning authorities should apply the following principles: if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or as a last resort, compensated for, then planning permission should be refused; development on land within or outside of a SSSI, which is likely to have an adverse effect on it, should not normally be permitted; development resulting in 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; and development whose primary objective is to conserve or enhance biodiversity should be supported.
205. Further, Section 120 (General duty to conserve and enhance biodiversity) of the Environment Act 2021¹⁵, states “(A1) For the purposes of this section “the general biodiversity objective” is the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England. (1) A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective. (1A) After that consideration the authority must (unless it concludes there is no new action it can properly take)— (a) determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and (b) take such action as it considers appropriate, in the light of those policies and objectives, to further that objective”.
206. Criteria D of the NPPW 2014, requires consideration of any adverse effect on a site of international importance for nature conservation (Special Protection Areas, Special Areas of Conservation and RAMSAR Sites), a site with a nationally recognised designation (Sites of Special Scientific Interest, National Nature Reserves), Nature Improvement Areas and ecological networks and protected species.
207. Policy CSP17 of the TDCS 2008, requires development proposals to protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to sustain wildlife in accordance with the aims of the Surrey Biodiversity Action Plan.

¹⁵ Replaces Section 40 of the Natural Environment and Rural Communities Act 2006.

208. Policy DP19 of the TDLP 2014, sets out a presumption in favour of development proposals which seek to promote nature conservation and management. Part B of this policy explains that in order to conserve and enhance the natural environment, proposals which result in significant harm to local, national or statutory sites of biological or geological importance or the broader GI network will be refused planning permission unless: all reasonable alternative locations with less harmful impacts are demonstrated to be unsuitable; and the proposal incorporates measures to avoid the harmful impacts arising, sufficiently mitigate their effects, or as a last resort, compensate for them.
209. Policy TLP35 of the TDC Emerging Local Plan, states that proposals for development at any given site should ensure that there is a net gain in biodiversity. Schemes should provide for the maintenance, enhancement, and if possible, expansion of important assets, by aiming to restore or create appropriate priority wildlife habitats and ecological networks to sustain and recover biodiversity. Where proposals fall within or adjacent to a Biodiversity Opportunity Area, biodiversity measures should support that BOA's objectives as set out in the BOA-specific policy statements. Furthermore, proposal within or outside a SSSI, LNR or SNCI which would be likely to adversely affect the designated site (either individually or in combination with other developments) will not be permitted unless the benefits of the development clearly outweigh both the adverse impacts on the designated site and any adverse impacts on the wider biodiversity network.

Assessment

210. The application site and wider quarry is located within the Holmethorpe Sandpits Complex Site of Nature Conservation Importance (SNCI), selected for its lagoons, ruderal communities, marsh, willow carr, rank grassland, as well as being of County importance for birds, both as foraging and breeding sites.
211. Sites of Nature Conservation Importance are sites selected because of their local conservation value at a County level. SNCIs make a vital contribution to delivering national commitments to halting the loss of biodiversity (and now also as a primary foci for enabling nature's recovery). SNCIs can have as much ecological value as nationally designated SSSIs, the latter being designated as only a representative sample of the best examples of habitat types present in a local area.
212. The application site and wider quarry are also included within the Holmesdale Biodiversity Opportunity Area (BOA) (Ref: WG11). Designation of BOAs represents a targeted landscape-scale approach to conserving and recovering biodiversity and are areas where the greatest opportunities for habitat creation and restoration lie, that will eventually become part of Surrey's Nature Recovery Network. The key targets are creation/restoring floodplain grazing marsh, standing open water, reedbeds, hedgerow and heathland/acid grassland, all priority habitats. Priority species that would benefit within this BOA include Grey Partridge, Lapwing, Great Crested Newt, Brown Hare and Water Vole.
213. The application site would be in an active part of the Quarry, in an area of Phase 1. Phase 1 has already been stripped and excavated in accordance with the ecological requirements set out in the Environmental Statement Chapter 6 – Landscape and Ecology Management Plan that formed part of planning permission Ref: TA/2013/1799 dated August 2014 and secured under Condition 28 of the planning permission Ref: TA/2019/2147 dated 10 September 2020.

214. The County Ecologist provided initial comments on the proposal and raised concern that no ecological justification, or update assessment, had been provided to support the proposed SRF facility at the site to enable an assessment as to whether the facility would have the potential to increase disturbance levels across the Holmethorpe Sandpits Complex SNCI. It was therefore advised that the applicant provides further technical information, including direct and indirect potential adverse impacts to Ecology and Nature Conservation prior to determination.
215. In response to the concerns of the County Ecologist, the applicant submitted an ecological technical note titled '*Consideration as to the importance of the Holmethorpe Sandpits SNCI in relation to the application for soils recovery at Mercers Quarry, Surrey*'. This document sets out that a bird survey was undertaken at the quarry, including the area of the proposed SRF, using the standard British Trust for Ornithology Methodology with four visits between April and June 2021.
216. A sand martin colony was present in the eastern face of the quarry (which is not adjacent to the proposed SRF but some 80m in distance) and wren, whitethroat, dunnock, long-tailed tit and chaffinch were recorded on the adjacent soil screening mound. The document concludes that the area of the proposed SRF holds none of the features for which the Holmethorpe Sandpits Complex SNCI is designated and, further there is none within 50m of the site. It has not been found to hold any bird species that would depend on these habitats. Thus, it makes no contribution to the designation of the SNCI.
217. On review of the further information the County Ecologist is satisfied with the details provided and comments, there is no reason to consider that there is likely to be an impact on the SNCI directly or indirectly, either as a result of the siting of the SRF or any changes to the timing of the phasing of the consented restoration.
218. The Surrey Wildlife Trust (SWT) in their non-statutory consultee role have commented on the proposal and raise objection on the grounds that a significant proportion of the restoration proposed is to agriculture and that in the opinion of the SWT the restoration is lacking in scope and could essentially re-purpose all of the land for biodiversity and nature conservation and recovery.
219. With regard to the comment of the SWT, the proposal is for the installation and use of a SRF to facilitate the on-going progressive restoration of the site to be delivered by 2036. As outlined previously in this report, the approved restoration scheme at Mercers South Quarry (Ref: TA/2013/1799 dated 12 August 2014), is for an agricultural after use with landscape and ecological enhancements. The delivery of this scheme using imported inert materials is already established under the extant planning permission for the site. The applicant is not seeking to change the approved final restoration scheme as part of this development. Consequently, it is not for this application to reconsider the proposal after use of the Quarry which was considered as part of the parent permission and remains valid. As such, Officers consider that the comments of the SWT to not be relevant to the determination of this application.

Conclusion

220. Having regard to the above, Officers consider that sufficient information has been provided to determine that the proposal would not have an impact on the Holmethorpe Sandpits Complex SNCI and there are no other protected species within the application area. As such the development satisfies the requirements of the development plan policy MC14 of the SMP 2011, Policy 14 of the SWLP 2020,

Policy CSP 17 of the TDCS 2008 and Policy DP19 of the TDLP 2014 and Policy TLP43 of the TDC Emerging Local Plan, alongside the national requirements of the NPPF and NPPW, in this regard.

Flood Risk and Drainage

221. The proposed SRF and stockpiling of materials would be undertaken within Flood Zone 1 and outside of the groundwater Source Protection Zone. The facility would be situated on a flat base constructed of 6F5 material within an area of approximately 0.6ha of Phase 1 from which sand has already been extracted, and which is enclosed by bunds.
222. Paragraph 159 of the NPPF 2021, states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 167 of the NPPF 2021, explains that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.
223. Paragraphs 055¹⁶ and 056¹⁷ of the NPPG outline that sustainable drainage systems are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Whether a sustainable drainage system should be considered will depend on the proposed development and its location, for example where there are concerns about flooding. These systems may not be practical for some forms of development. As defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015, sustainable drainage systems should be provided unless demonstrated to be inappropriate. With regard to these systems the aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:
1. into the ground (infiltration);
 2. to a surface water body;
 3. to a surface water sewer, highway drain, or another drainage system;
 4. to a combined sewer.
224. In respect of the protection of water quality and resources and flood risk management the NPPW 2014 Appendix B Criteria A, requires consideration of the proximity of vulnerable surface and groundwater or aquifers and the suitability of locations subject to flooding, with consequent issues relating to the management of potential risk posed to water quality from waste contamination also needing particular care.
225. Policy 14 of the SWLP 2020 sets out that development will be granted where it can be demonstrated that it would not result in acceptable impacts on the water environment, including flood risk and impacts on and opportunities to provide and enhance, flood storage and surface water drainage capacity and water resources including Source Protection Zones.
226. Policy DP21 of the TDLP 2014, requires that proposals avoid damage to Groundwater Source Protection Zones, having regard to the Environment Agency's

¹⁶ Reference ID:7-055-20220825

¹⁷ Reference ID: 7-056-20220825

'Ground Water Protection: Policy and Practice' guidance and seek to secure opportunities to reduce both the cause and impact of flooding and incorporate Sustainable Drainage Systems (SuDs) suitable to the scale and type of the development, ensuring the discharge of surface run off is restricted to that of the pre-development site. Policy TLP47 of the TDC Emerging Local Plan, seeks to ensure that development in the District reduces flood risk and minimises the impact of flooding, through a number of measures including steering development to areas with a lower risk of flooding, taking account of all sources of flooding and accounting for the impact of future climate change. Sustainable drainage systems are required for all major non-residential schemes and should ensure surface run off is managed as close to the source as possible.

Assessment

227. The applicant has set out in the Overarching Planning Statement dated July 2022, that the installation and operation of the SRF would not result in emissions into the surface water or ground water and no washing of the waste or dewatering is required in connection with the proposed operation. In this regard, the site would continue to operate in accordance with the 'Long Term Water Management and Monitoring Plan' dated March 2015, and the 'Operational Flood and Drainage Management Plan' dated March 2015, which were approved pursuant to Conditions 16 and 13 of planning permission Ref: TA/2013/1799 dated August 2014. As such, the SRF does not seek to alter the existing drainage strategy that operates at the site.
228. The Lead Local Flood Authority (LLFA) were consulted on the application and have raised no objection. The LLFA note that there is no change to the drainage strategy or surface water drainage system employed at the site and raise no objection. The Environment Agent have also raised no concerns in this regard.

Conclusion

229. Officers are therefore satisfied that the proposed SRF facility is unlikely to have an adverse and unacceptable impact on flood risk or the local water environment and suitable processes remain in place on the site to manage flood risk and surface water in the context of the quarry operations. As such the development satisfies the requirements of the development plan policy MC14 of the SMP 2011, Policy 14 of the SWLP 2020, Policy DP21 of the TDLP 2014 and Policy TLP47 of the TDC Emerging Local Plan, alongside the national requirements of the NPPF and NPPW, in this regard.

Contamination

230. Paragraph 188 of the NPPF 2021, sets out 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), and that planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.
231. Policy DP22 of the TDLP 2014 deals with development proposals on contaminated land which is not the case here. However, the policy does say that where there is evidence of a high risk from residual contamination the applicant will be required to show as part of the application how decontamination will be undertaken.

232. The Tandridge District Council Contaminated Land Officer has commented on the proposal, whilst no objection is raised, it is recommended that a condition is attached to any grant of planning permission which would require the submission and approval of a material management and movement plan, including an annual monitoring report of the deposited material. Where nonconformities are identified a scheme of corrective action shall be submitted to and approved by the MPA and implemented within three months of the date of approval.
233. As set out in this report, planning permission is sought for the installation and use of a SRF to attract a greater proportion of C,D&E waste into the site to facilitate the approved restoration scheme. The approved restoration scheme at Mercers South Quarry is for an agricultural after use with landscape and ecological enhancements. The delivery of this scheme using imported inert materials is already established under the extant planning permission for the site. The permitted sand extraction output (250,000tpa), void volume to be filled (150,000m³) and waste type (C,D&E) would remain unchanged. The applicant has obtained a recovery permit from the Environment Agency to allow for this type of waste to be accepted at the site.
234. As part of the permit process the Environment Agency undertake their own monitoring visits and checks with the applicant which will ensure that all pollution control activities in respect of incoming waste streams and the recovery operation on the site are covered by that process. In accordance with the NPPF 2021, Officers do not consider it necessary to duplicate this process, through the imposition of a materials management plan condition.
235. The County Geotechnical Consultant (CGC) has reviewed the application, and notes that it is possible that the SRF operations could be contaminative due to the use of fuel and lubricants for the plant and machinery to operate effectively. It is therefore recommended that a Condition is attached to any grant of permission to ensure that the application area is checked for legacy contamination after decommissioning and removal of hardstandings, structures, drainage features and pavements etc but before the commencement of the placement of the final restoration soils.
236. Officers are satisfied that the imposition of such a condition will ensure all infrastructure associated with the proposed SRF, and any underground elements, do not leave potentially hazardous materials or pollutants remaining; and are satisfied that this detail is better suited to be submitted prior to the decommissioning of the SRF. In doing so, the submitted scheme can ensure mitigation and remediation measures are provided as required in accordance with the development plan Policy 14 of the SWLP 2020, Policy DP22 of the TDLP 2014 and Policy TLP46 of the TDC Emerging Local Plan, in this regard.

Environment and Amenity Conclusion

237. Officers consider that any impact on the environment or amenity will be temporary and can be controlled/mitigated to acceptable levels by the imposition of planning conditions, as set out above. As such, taking the above assessment into consideration, Officers consider that the proposal, subject to planning conditions, is consistent with the aims and objections of development plan policies relating to the environment and amenity.

METROPOLITAN GREEN BELT

Surrey Minerals Plan Core Strategy Development Management Plan 2011 (SMP 2011)

Policy MC3 – Special Strategy – Mineral development in the Green Belt

Surrey Waste Local Plan Part 1 – Policies 2020 (SWLP 2020)

Policy 9 – Green Belt

Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (TDLP 2014)

Policy DP10 – Green Belt

Tandridge District Council Emerging Plan: Our Local Plan 2033.

Policy TLP03 – Green Belt

238. The application site lies within the Metropolitan Green Belt where policies of restraint apply.
239. As set out in paragraph 137 of the NPPF 2021, the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Paragraph 138 of the NPPF 2021, sets out that the Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Of these purposes, purpose c) is the most relevant to this proposal.
240. Green Belt policy guards against inappropriate development. The NPPF states at paragraph 147 that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. The NPPF requires at paragraph 148 that substantial weight is given to any harm to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 150 of the NPPF 2021 sets out that certain forms of development are not considered to be inappropriate development in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. One of these exemptions is ‘mineral extraction’. The NPPF 2021 at paragraph 209 acknowledges that minerals are a finite natural resource that can only be worked where they are found.
241. Paragraph 3.45 of the SMP 2011 recognises that almost all workable mineral deposits in Surrey are within the Green Belt. Paragraph 3.47 of the SMP 2011 states that land in the Green Belt can make a positive contribution to providing opportunities for access to open countryside, recreation, retaining and enhancing attractive landscapes, securing nature conservation interest and restoration of mineral workings should have regard to these objectives. Policy MC3 of the SMP 2011 states that mineral extraction in the Green Belt will only be permitted where the highest environmental standards of operation are maintained, and land restored to beneficial after uses consistent with Green Belt objectives within agreed time limits.
242. As set out at paragraph 5.3.1.4 of the SWLP 2020, waste development that may not be considered ‘inappropriate; including that which is related to the restoration of mineral sites that can play a positive role in meeting the objectives of the Green Belt. In the context, of this application, permission is sought for the installation and use of

a SRF where temporary planning permission exists until 2036 for the operation and restoration of the quarry. Whilst the SRF would contribute to the restoration of the mineral site, the proposal is considered a waste management operation (soils recovery facility) and is therefore not deemed to be compatible with the objectives of the Green Belt, nor is it an exemption as listed in paragraph 150 of the NPPF 2021 and is therefore considered to be inappropriate development.

243. Policy 9 of the SWLP 2020, states that planning permission will not be granted for inappropriate waste management development in the Green Belt unless it is shown that very special circumstances exist. 'Very Special Circumstances' will not exist unless the potential harm caused to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations associated with the proposal, either on their own or in combination.
244. Policy DP10 of the TDLP 2014 states that the Green Belt boundary will be altered only in exceptional circumstances and that inappropriate development in the Green Belt will normally be refused and will only be permitted where very special circumstances exist which clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm. Policy TLP03 of the TDC Emerging Local Plan, confirms that changes to the Green Belt boundary will only take place for South Godstone Garden Community, which does not include the application site or the wider quarry.

Harm

245. The proposal seeks to bring onto site an activity that would involve the recycling of waste materials. This would include the creation of a surface area and the use of a screener and a crusher, alongside stockpiling areas of unprocessed and processed materials before the material is either exported from site or used as part of the restoration activities. The application area would be surrounded by either other operational activities being undertaken at the Quarry or restored areas as working of the Quarry processes. Both the proposed crusher and screener would be lower in height than the existing surrounding soil storage bunds at the Quarry.
246. The proposal would be inappropriate development in the Green Belt. Officers consider the proposal would have modest harm to the openness of the Green Belt. This is because, whilst the height of the proposed plant and stockpiles would be lower than the surrounding soil storage bunds; and the small scale of the operation in the context of the existing Quarry area (1.15% of the overall Quarry); the proposal would be bringing on to the site new plant and a new operation and would result in a delay to the restoration of that part of the Quarry and could be visible in some short and long range views of the site from the surrounding landscape. These harms must carry substantial weight in the overall Green Belt balance in accordance with the Policy 9 of the SWLP 2020, Policy DP10 of the TDLP 2014 and emerging Policy TLP0 and paragraph 148 of the NPPF 2021.

Very Special Circumstances

247. In accordance with the national and development plan policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the

Green Belt by reason and inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

248. The applicant has set out in the Overarching Planning Statement dated July 2022, a list of factors, which they consider amount to very special circumstances that outweigh the harm to the Green Belt. The applicant's list is summarised as follows:
- The proposed SRF would be located within the operational quarry, from which sand has already extracted. The site location in the Green Belt was addressed at the time of the original planning permission for Mercers South (Ref: TA/2013/1799) and the subsequent application for a small extension to the permitted working area (Ref: TA/2017/2346).
 - Temporary planning permission for the SRF is sought commensurate with the permitted life of the wider quarry. The proposal for the SRF would not alter the extent of extraction or the timescale for the completion of the mineral development. Consequently, it would be wholly linked to achieving the timely restoration of the site, which should be carried out at the earliest opportunity and to a high quality (Policy MC3 of the SMP 2011).
 - The scale and nature of the proposal would not markedly intensify operations such as to conflict with the fundamental aim of Green Belt policy, or the objectives of the designation. The SRF will comprise only mobile screening and crushing plant and associated stockpiles and will use the existing access and ancillary facilities (weighbridge office and weighbridge).
 - The need for the county wide and regionally important Mercers Sands to the construction industry is already established and inextricably linked to the permission to extract is the need to restore the land for on-going beneficial use. The SRF would increase the flexibility to attract the right volume and type of materials and so assist the applicant in achieving the progressive restoration, within the requisite timeframes. Co-location of the temporary SRF within the mineral workings is fundamental to supporting the timely and progressive delivery of the approved restoration of Mercers South, consistent with the Green Belt objectives.
 - There is a requirement to move materials up the waste hierarchy and to recycle as much as possible before recovering materials for restoration and disposal. National policy requires account to be taken of the potential contribution from recycled materials before considering extraction of primary materials and this is particularly pertinent in Surrey where concreting aggregates resources as depleted. Co-location of the temporary SRF will enable recyclable materials to be screened from the waste stream and processed to produce a recycled aggregate for use in construction, so contributing to Surrey's recycling targets.
 - Mercers South is well located to sources of waste arising and sources of demand for recycled aggregates.
 - As demonstrated in the HGV numbers, updated noise and air quality assessments the proposed development could operate within the existing thresholds, without any additional adverse effects.
 - Backloading HGV used to import restoration materials into Mercers South with crushed material would help to reduce the number of empty HGVs on local roads,

as well as congestion and carbon emissions that could arise if the contractor had to make an additional journey to source the crushed materials from elsewhere.

- The proposed development would support the local economy, creating three additional local jobs.

Conclusion

249. Officers recognise that the proposed SRF and processing are temporary uses of the land, commensurate with the life of the operational quarry site, and once the land is restored, this would preserve the openness of the Green Belt in the long term. As set out in the proceeding sections of this report, the SRF facility is considered to be well situated within the established operational quarry and existing worked area of Phase 1. As such the visual impact of the operation beyond the boundary of the quarry would be limited and mitigated by the topography of the site and existing soil storage bunds.
250. The applicant has made it clear that the primary purpose of the facility is to contribute to the timely restoration of the mineral working, providing for the recovery of soils. As set out above, the application has taken steps to proactively respond to the market including varying the Permit to a Recovery Permit and the acceptance of non-hazardous low biodegradable soils. The progressive restoration also aids the control of water for the dewatering process during extraction, which ensures that large voids are not left open on the site, which could result in an impact openness.
251. As set out in the proceeding sections of this report Officers agree that the co-location of recycling facilities on mineral development sites attracts a greater amount of C, D and E waste that can positively facilitate restoration and provide in this case a modest contribution to the aggregate recycling targets for Surrey in the short to medium term, and national recycling objectives.
252. In terms of the harm to the Green Belt, Officers recognise that the proposal will increase operations at the quarry, however in accordance with the proceeding sections of this report, the SRF is considered to remain adequately screened in terms of visual and audible impacts within the confines of the quarry and beyond by the soil storage bunds. Furthermore, the operations are temporary, requiring removal by 2035, following the cessation of infilling at the site and in accordance with the final restoration of the quarry in 2036. Furthermore, in terms of other harm, Officers are satisfied as set out in the preceding sections of this report that the facility will operate within the parameters of the extant planning permission which includes controls on HGV movements, noise, dust and hours of operation, and any impact arising from the proposed facility can be appropriately controlled or mitigation through the imposition of conditions.
253. As the development is inappropriate development in the Green Belt it is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Officers consider that the proposed development is reversible and would not prevent the long-term restoration and aftercare of the site and ensure the openness of the Green Belt is preserved. The facilities are positioned well within the confines of the existing quarry site and given the boundary treatment are not readily visible from public or long-range views. The operation and removal of the facilities will be tied to the approved timescale for the permitted quarry operations, and restoration in 2036.

- 254. Officers do not consider that any single element, on its own in this case, can be described as being so very special a circumstance as to outweigh the overall harm to the Green Belt of the introduction of plant and stockpiles and the operations proposed. However, Officers consider that there are a number of factors, which together could contribute to constitute very special circumstances that clearly outweigh the harm to the Green Belt. These factors include the need for recycling C,D and E waste thereby moving this waste stream up the waste hierarchy contributing to the county's target for aggregate recycling and towards sustainable waste management in general; the benefits of co-locating such facilities within operational mineral sites; and the provision of soils through the waste stream to facilitate the ongoing restoration of the Quarry.
- 255. Officers are therefore satisfied the factors advanced by the applicant amount to very special circumstances which outweigh the harm by reason of inappropriateness to the Green Belt. Officers are satisfied that subject to the imposition of conditions there would be no other harm from the proposal. Officers therefore consider that very special circumstances exist which justify permitting the proposed development in the Green Belt. Accordingly, the development would not conflict with Policy 9 of the SWLP 2020, Policy DP10 of the TDLP 2014 and Policy TLP03 of the TDC Emerging Local Plan and Officers consider that temporary permission should be granted subject to Conditions.

Human Rights Implications

- 256. 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.
- 257. The Officer's view is that there are no impacts on amenity. This proposal does not engage any of the articles of the Convention and has no Human Rights implications.

Conclusion

- 258. Planning permission is sought for the temporary use of 0.6ha of land at Mercers South Quarry, for the importation of Construction, Demolition and Excavation (C,D and E) waste and the siting and use of a mobile screener and a crusher to enable the recovery of soils to assist with on-site restoration and the production of recycled aggregates for sale and export.
- 259. The proposal needs to be assessed and considered as a new waste proposal within the Metropolitan Green Belt where there is a presumption against inappropriate development. As such the application was advertised as a departure from the provisions of the Development Plan.
- 260. The development is considered to be reversible and would not prevent the long-term restoration and aftercare of the site. The facilities are positioned well within the confines of the existing quarry site and given the boundary treatment are not readily visible from public or long-range views. The operation and removal of the facilities will be tied to the approved timescale for the permitted quarry operations, and restoration in 2036. The proposal would increase HGV movements by 20 a day however these can be comfortably absorbed within the existing site limitations.

261. Officers recognise the applicant's proactive approach and steps taken to ensure the timely restoration of Mercers South Quarry and to a high environmental standard in accordance with the extant permission and the approved restoration scheme. It is clear that the applicant has sought to mitigate any potential concern regarding the availability of fill material, and the SRF would enable the site to capture a greater amount of material from construction sites, to provide the reassurances required.
262. The application site is a preferred area identified within the SMP 2011 for the extraction of soft sand (Preferred Area P – Mercers Farm, Nutfield), whilst the site is not identified under Policy AR3 of the ARJDPD 2013 as a preferred mineral site for aggregates recycling, the proposal would be located within the active soft sand quarry and would facilitate restoration of the site. In this respect the duration of the development would be limited to the life of the quarry, with removal required by 2035, to accord with the final restoration of the site in 2036 (as approved under planning permission Ref: TA/2019/2147 dated 10 September 2020), in accordance with the locational criteria of Policy 3 of the SWLP 2020. In addition, the proposed development would make an important contribution, albeit modest, towards maintaining the County's aggregates recycling targets, and to supply an alternative construction material in the context of diminishing primary concreting aggregate resources.
263. The application site is located in the Metropolitan Green Belt and is inappropriate development which is, by definition, harmful to the Green Belt and which should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The proposal would impact on the openness of the Green Belt albeit Officers consider this harm to be modest. The applicant has advanced factors they consider to be very special circumstances that would clearly outweigh the harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal. Officers are satisfied that the proposal would contribute to the County's targets for recycling and moving waste up the hierarchy and would also attract a waste stream to the site providing soils that are necessary for the restoration of the site. Officers are satisfied that for this proposal very special circumstances have been demonstrated.
264. The implications of the proposed development have been assessed in terms of the need for the facility, highways, traffic and access and local environment and amenity. Officers consider that the operation of the SRF within the quarry void combined with the existing quarry screening mounds would limit views of its operation, and as such would not give rise to significant impacts with respect to the landscape and visual impacts, subject to the conditions. Officers consider that any impact on the environment or amenity including cultural heritage, noise, dust, flood risk and contamination will be temporary and can be controlled/mitigated to acceptable levels by the imposition of planning conditions. Furthermore, Officers are satisfied as set out in the preceding sections of this report that the facility will operate within the parameters of the extant planning permission which includes controls on HGV movements, noise, dust and hours of operation, and any impact arising from the proposed facility can be appropriately controlled or mitigation.

265. Based on the information obtained from the applicant and the consultation responses from technical consultees and non-statutory consultees as set out in this report, Officers are satisfied there will be no cumulative impact between the existing quarry site and the proposed facility. The proposed development therefore meets the requirements of the development plan policy and national policy in this regard and planning permission should be granted in this case subject to suitable planning conditions.

Recommendation

The recommendation is to PERMIT application TA/2022/1155 subject to the following conditions:

Conditions:

Approved Plans

1. The development hereby permitted shall be carried out in accordance with the following approved plans and drawings:
 - Drawing No: MS/SR/1 Rev E Site Location Plan dated 13.06.22
 - Drawing No: MS/SR/2 Rev E Site Plan dated 13.06.22
 - Drawing No: MS/SR/3 Rev B Indicative Layout – Soils Recovery and Aggregates Recycling (SRF) dated 14.06.22
 - Drawing No: MS-SR-4 Rev 00 Illustrative Section – Soils Recovery and Aggregate Recycling (SRF) dated 16.01.23

2. From the commencement of the development, until such time as operations at the quarry cease, a copy of this permission and the approved drawings referred to in Condition 1 and any subsequently approved in accordance with this permission shall always be available for inspection at the site manager’s office during normal working hours. Their existence and contents shall be made known to all operatives, including sub-contractors likely to be affected by matters covered by them.

Commencement

3. The development hereby permitted shall begin no later than the expiration of three years beginning with the date of this permission. The applicant shall notify the County Planning Authority in writing within seven working days of the commencement of the implementation of this planning permission.

Duration

4. All importation, deposit and storage and processing of construction, demolition and excavation waste and export of materials arising from this process shall cease and all plant and machinery, hardstanding and stockpiles shall be removed by 31 December 2035; and the site be restored by 31 December 2036 in accordance with the approved restoration scheme and plans for Mercers South Quarry.

Hours of Operation

5. No operation authorised or required within the site under this permission other than the servicing, maintenance and test of mobile plant and other similar work of an essential nature, shall be carried out on site except between the following times:

0700 - 1800 hours Monday to Friday

0700 - 1300 hours Saturdays

There shall be no working on Sundays, Public Holidays, Bank Holidays or National Holidays

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Limitations

6. The development hereby permitted shall only be operated within the area of Phase 1 of Mercers South Quarry, as shown on Drawing No: MS/SR/3 Rev B Indicative Layout – Soils Recovery and Aggregates Recycling (SRF) dated 14.06.22, at an operational ground level of 87 metres AOD.
7. The Soil Recovery Facility hereby permitted shall receive a maximum of 75,000 tonnes per annum of Construction, Demolition and Excavation (C,D and E) Waste and the quantity of recovered waste material exported per year from Mercers South Quarry shall not exceed 37,500 tonnes per annum. The operator shall maintain an accurate record of the total tonnage of C,D and E waste imported and recovered waste material exported from the site, which shall be submitted in writing to the County Planning Authority on the 1 April, 1 July, 1 October and 1 January each year.
8. Notwithstanding the provisions under Part 7 Class L of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification),
 - (a) no buildings, fixed plant or machinery shall be located on the site of the development hereby permitted without the prior submission to and approval in writing by the County Planning Authority of details of their siting, detailed design, specifications and appearance. Such details shall include details of noise emission levels (including tonal characteristics) of any plant or machinery; and
 - (b) no fencing or external lighting other than that hereby permitted shall be erected or installed at the site of the development hereby permitted unless details of them have been submitted to and approved in writing by the County Planning Authority.

Highways, Traffic and Access

9. All HGV movements associated with the importation of construction, demolition and excavation waste to the development hereby permitted, shall access the site via the site vehicular access from the A25 Bletchingley Road only. There shall be no means of access for HGVs via Cormongers Lane and Nutfield Marsh Road.
10. The site vehicular access to the A25 Bletchingley Road shall be permanently maintained with visibility zones in accordance with the scheme shown on approved Drawing No: Figure T9 - Proposed Access off the A25 dated 16 April 2013 of planning permission TA/2019/2147 dated 10 September 2020. The visibility zones shall be kept permanently clear of any obstruction to the satisfaction of the County Planning Authority.
11. When measured in combination with all planning applications for Mercers South Quarry, the average cumulative number of HGV movements to and from the site shall be restricted as follows:

- No more than an average of 300 HGV movements per day Monday to Friday, not exceeding 350 movements on any single day;

-No more than an average of 150 HGV movements per day on Saturdays, not exceeding 240 movements on any single Saturday;

The site operator shall maintain accurate records of the number of HGV vehicles accessing and egressing the site daily and shall make these available to the County Planning Authority on request.

12. Facilities shall be provided and used as shown on approved Drawing No: Figure 10-4 Proposed Site Layout dated September 2018 of planning permission Ref: TA/2019/2147 dated 10 September 2020 (or any subsequently approved Plans by the County Planning Authority) in order that the operator can make all reasonable efforts to keep the public highway clean and prevent the creation of a dangerous surface on the public highway.

Surface and Groundwater Protection

13. If, during development, contamination not previously identified is found to be present at the site then, the soil recovery operations shall cease until a remediation strategy detailing how this unexpected contamination shall be dealt with, is submitted to and approved in writing by the County Planning Authority. The remediation strategy shall be implemented as approved.
14. The development hereby permitted shall be carried out in accordance with the Operational Flood and Drainage Management Plan dated March 2015, as approved by the County Planning Authority by decision dated 18 June 2015 under permission ref: TA/2013/1799.
15. Any facilities for the storage of chemicals and fuels shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. If there is multiple tankage, the compound should be at least equivalent to 110% of the capacity of the largest tank, or 25% of the total combined capacity of the interconnected tanks whichever is the greatest. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund.

Noise

16. When measured at, or recalculated as at, a height of 1.2 m sited no more than 3.5 m from a noise sensitive building, the level of noise emitted as a result of any activity or operation at the site and associated with the development hereby permitted shall not exceed 55 LAeq for any 0.5 hour period.
17. Should the site fail to comply with the set noise limit, within 21 days of any evidence of a breach of the noise limits being identified, the applicant shall submit a scheme for approval in writing to the County Planning Authority to attenuate noise levels to the required level. Once approved, the scheme shall be implemented within seven

working days of the County Planning Authority issuing approval for the scheme, or the source of the breach of noise limit shall cease until the scheme is in place.

18. All plant, machinery and company owned HGVs operating at the site shall be fitted with, and use, a white noise type vehicle reversing alarm or switchable system. All plant, machinery and vehicles operated within the site shall be maintained in accordance with the manufacturers' specification at all times.

Air Quality and Dust

19. Within six months of the date of this permission, the approved Dust Action Plan (DAP) and Dust Monitoring Scheme (DMS) (v1RevSCC) dated July 2015, shall be updated to include the soil recovery facility and associated aggregates recycling, including any changes to the location of monitoring to ensure that the facility is adequately covered by the dust management processes in place at Mercers South Quarry.
20. No activity hereby permitted shall emit dust, which causes a nuisance beyond the boundaries of the site, due to either inappropriate working or adverse weather conditions. Should a breach of the Dust Monitoring Scheme as submitted under Condition 19 above occur appropriate (good practice) measures shall be taken to abate the problem, but if unsuccessful the activity shall be suspended until it can be resumed without causing emission as a result of different methods of working, the addition of additional dust suppression measures or changed weather conditions.

Landscape

21. The Temporary Mounding as shown on Drawing No: LMSL/16/JJF/MC/7 Rev D, Landscape Proposals Years 8-16 (Year 12), dated, 10.02.23, to the east and south of the development hereby permitted, shall be retained in situ until the cessation and removal of the Soils Recovery Facility on 31 December 2035.
22. The stockpiling of material within the area hereby permitted for the soil recovery facility shall not exceed 4 metres in height above the operational ground level (87 metres AOD). Profile boards shall be erected at a maximum height of 91m AOD on each side of the stockpiling area so that that levels may be checked and controlled.

Contamination

23.
 - a) Within one month of site decommissioning, and prior to the commencement of restoration and placement of any restoration soils, a scheme of inspection and testing of the ground and any surface water and shallow groundwater for any contamination legacy resulting from the operations shall be submitted to and approved in writing by the County Planning Authority. The scheme shall include the compound area and the Soil Recovery Facility. The scheme shall describe how the exposed ground and any groundwater or remnant surface water present shall be inspected, sampled and tested to demonstrate there is no legacy of contamination before restoration is undertaken. The work shall be designed and undertaken under the direction of a competent and experienced contaminated land specialist.
 - b) The scheme shall be implemented as approved and prior to commencement of restoration and placement of any restoration soils the results shall be submitted to the CPA in the form of a Geo-environmental decommissioning report demonstrating

that the site contains no legacy of contamination. The CPA shall be informed when the post decommissioning sampling is due to take place and shall be afforded the opportunity to inspect the ground surface before the site is restored. Inspection of the exposed ground shall take place after removal of all surface installations, foundations, hardstandings, pavements, buried utilities, ditches and drainage elements.

c) If either: a) during any operations at the site or b) on implementing the scheme of inspection and testing, contamination not previously identified (unexpected) is found to be present at the site, then no further development or decommissioning work shall be carried out until a further scheme of inspection and testing (if required) and a remediation strategy has been submitted to and approved in writing by the CPA, detailing how the unexpected contamination shall be dealt with. The further investigations and remediation strategy shall be implemented as approved, and the results submitted to the CPA in the form of a verification report.

Reasons:

1. For avoidance of doubt and in the interests of proper planning.
2. For avoidance of doubt and in the interests of proper planning.
3. To enable the County Planning Authority to exercise planning control over the operation so as to minimise the impact on local amenity and to ensure the prompt and effective restoration to comply with Schedule 5 paragraph 1 of the Town and Country Planning Act 1990 and Surrey Minerals Plan 2011 Core Strategy Policy MC17.
4. To enable the County Planning Authority to exercise planning control over the operation so as to minimise the impact on local amenity and to ensure the prompt and effective restoration to comply with Schedule 5 paragraph 1 of the Town and Country Planning Act 1990 and Surrey Minerals Plan 2011 Core Strategy Policy MC17.
5. To enable the County Planning Authority to exercise planning control over the development so as to minimise disturbance and avoid nuisance to the locality, to safeguard the environment and protect the amenities of local residents in accordance with the terms of the Surrey Waste Local Plan 2020 Policy 14; the Tandridge District Core Strategy 2008 Policy CSP15 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP7
6. To enable the County Planning Authority to exercise planning control over the operation so as to minimise the impact on local amenity and landscape character in accordance with Surrey Waste Local Plan 2020 Policy 14, Tandridge District Council Core Strategy 2008 Policy CSP21.
7. To enable the County Planning Authority to exercise planning control over the operation so as to minimise the impact on local amenity in accordance with the Surrey Waste Local Plan 2020 Policy 14, Tandridge District Core Strategy 2008 Policy CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP7.
8. To safeguard the environment and protect the amenities of the locality in accordance with the terms of Surrey Waste Local Plan 2020 Policy 14, Tandridge District Core

Strategy 2008 Policy CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP7.

9. In order that the development should not prejudice highway safety nor cause inconvenience to other road users in accordance with Surrey Waste Local Plan Policies 14 and 15; the Tandridge District Core Strategy 2008 Policies CPS12 and CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP5.
10. In order that the development should not prejudice highway safety nor cause inconvenience to other road users in accordance with Surrey Waste Local Plan Policies 14 and 15; the Tandridge District Core Strategy 2008 Policies CPS12 and CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP5.
11. In order that the development should not prejudice highway safety nor cause inconvenience to other road users in accordance with Surrey Waste Local Plan Policies 14 and 15; the Tandridge District Core Strategy 2008 Policies CPS12 and CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP5.
12. In order that the development should not prejudice highway safety nor cause inconvenience to other road users in accordance with Surrey Waste Local Plan Policies 14 and 15; the Tandridge District Core Strategy 2008 Policies CPS12 and CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP5.
13. To protect groundwater from contaminants and pollution in accordance with Surrey Waste Local Plan 2020 Policy 14; and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP21 and DP22.
14. To ensure that the proposed development will not have a significant adverse impact on water quality or water resources in accordance with; Surrey Minerals Plan 2011 Core Strategy Policy MC14, Surrey Waste Local Plan Policy 14 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP21.
15. To protect groundwater from contaminants and pollution in accordance with Surrey Waste Local Plan 2020 Policy 14; and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP21 and DP22.
16. To enable the County Planning Authority to exercise planning control over the development so as to minimise disturbance and avoid nuisance to the locality, to safeguard the environment and protect the amenities of local residents in accordance with the terms of the Surrey Waste Local Plan 2020 Policy 14; the Tandridge District Core Strategy 2008 Policy CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP22.
17. To enable the County Planning Authority to exercise planning control over the development so as to minimise disturbance and avoid nuisance to the locality, to safeguard the environment and protect the amenities of local residents in accordance with the terms of the Surrey Waste Local Plan 2020 Policy 14; the Tandridge District Core Strategy 2008 Policy CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP22.
18. To enable the County Planning Authority to exercise planning control over the development so as to minimise disturbance and avoid nuisance to the locality, to safeguard the environment and protect the amenities of local residents in accordance

with the terms of the Surrey Waste Local Plan 2020 Policy 14; the Tandridge District Core Strategy 2008 Policy CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP22.

19. To enable the County Planning Authority to exercise planning control over the development so as to minimise disturbance and avoid nuisance to the locality, to safeguard the environment and protect the amenities of local residents in accordance with the terms of the; Surrey Waste Local Plan 2020 Policy 14; the Tandridge District Core Strategy 2008 Policy CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP22.
20. To enable the County Planning Authority to exercise planning control over the development so as to minimise disturbance and avoid nuisance to the locality, to safeguard the environment and protect the amenities of local residents in accordance with the terms of the; Surrey Waste Local Plan 2020 Policy 14; the Tandridge District Core Strategy 2008 Policy CSP18 and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP22.
21. To enable the County Planning Authority to exercise planning control over the operation so as to minimise the impact on local amenity and landscape character in accordance with Surrey Waste Local Plan 2020 Policy 14, Tandridge District Council Core Strategy 2008 Policy CSP21.
22. To enable the County Planning Authority to exercise planning control over the operation so as to minimise the impact on local amenity and landscape character in accordance with Surrey Waste Local Plan 2020 Policy 14, Tandridge District Council Core Strategy 2008 Policy CSP21.
23. To protect the soil and groundwater from any legacy pollution remaining on site after decommissioning in accordance with Surrey Waste Local Plan 2020 Policy 14; and Tandridge Local Plan 2014 Part 2: Detailed Policies Policy DP21 and DP22.

Informatives:

1. The permission hereby granted shall not be construed as authority to carry out works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a Section 278 agreement must be entered into with the County Council before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway, in association with the construction of the proposed vehicular access to the A25. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see: www.surreycc.gov.uk/people-and-community/emergency-planning-and-communitysafety/flooding-advice
2. 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. (Highways Act 1980 Sections 131, 148, 149).
3. Attention is drawn to the requirements of Sections 7 and 8A of the Chronically Sick and Disabled Persons Act 1970 and to the Code of Practice for Access of the

Disabled to Buildings (British Standards Institution Code of Practice BS 8300:2009) or any prescribed document replacing that code.

4. In determining this application the County Planning Authority has worked positively and proactively with the Applicant by assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its associated planning practice guidance and European Regulations, providing feedback to the Applicant where appropriate. Further, the County Planning Authority has identified all material considerations, forwarded consultation responses to the Applicant, 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 landscape and ecology and addressed through negotiation and acceptable amendments to the proposals. This approach has been in accordance with the requirements of paragraph 38 of the National Planning Policy Framework 2021.

[National Planning Policy Framework Planning Practice Guidance waste; traveller sites; planning for schools development; sustainable drainage systems; parking and Starter Homes.](#)

Contact Katie Rayner

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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 Tandridge District Council planning register for this application can be found under application reference TA/2022/1155.

Other documents

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

Government Guidance

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

The Development Plan

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

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

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

[Surrey Minerals Plan Site Restoration Supplementary Planning Document \(SPD\) 2011](#)

[Aggregates Recycling Joint DPD 2013](#)

Tandridge District Council Core Strategy 2008

Tandridge Local Plan Part 2: Detailed Policies 2014-2029

Other Documents

Mineral Site Restoration Supplementary Planning Document
Surrey County Council Annual Monitoring Report 2021
Surrey County Council Local Aggregates Assessment 2021
EPUK and IAQM Land Use Planning and Development Control: Planning for Air Quality (2017)
IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning (2016)
Historic England “The Setting of Heritage Assets” Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (2017)
Surrey Landscape Character Assessment: Tandridge District, dated April 2015
Noise Policy Statement for England (NPSE) 2010
Surrey County Council Noise Guidelines dated January 2020
