

TO: PLANNING & REGULATORY COMMITTEE**DATE:** 14 June 2017**BY:** PLANNING DEVELOPMENT TEAM MANAGER**DISTRICT(S)** RUNNYMEDE BOROUGH COUNCIL
ELMBRIDGE BOROUGH COUNCIL**ELECTORAL DIVISION(S):****Woodham & New Haw***Mrs Angell***Weybridge***Mr Oliver***PURPOSE:** FOR DECISION**GRID REF:** 506258 162744**TITLE:** MINERALS/WASTE RU.16/1960**SUMMARY REPORT**

Addlestone Quarry, National Grid Entrance, Byfleet Road, New Haw, Surrey KT15 3LA

The use of land for the importation of construction, demolition and excavation (C, D & E) waste and the siting of an aggregate recycling facility, involving the placement of mobile crushing and screening plant to enable the recovery of recycled aggregates for sale and export, for a temporary period until 31 December 2020. (retrospective)

The application is for the use of part of the existing aggregate plant site area for the siting and operation of an aggregate recycling facility (ARF), for a temporary period until 31 December 2020. The facility will be used to recycle construction, demolition and excavation (CD&E) waste, involving the mobile crushing and screening plant to enable the recovery of recycled aggregates for sale and export, with the residual inert waste used for the restoration of the quarry.

The key issues in determining this application will be compliance with the Development Plan and the impact on the local residential, environmental and amenity interests. In considering this application for a temporary planning permission it will be necessary to consider whether very special circumstances exist that overcome the normal presumption against inappropriate development in the Green Belt and harm by reason of inappropriateness, and any other harm. As well as Green Belt policy considerations, issues to consider include whether the proposal is supported by, and complies with development plan waste policy, including whether the application site in an appropriate location for waste development. Consideration will be given to any environmental or traffic issues associated with the operation of the aggregate recycling facility at Addlestone Quarry.

The application site is identified with the 2013 Aggregates Recycling Joint DPD, which sets out proposals for the provision of aggregate recycling facilities and identifies preferred areas for locating facilities and sets out policy for consideration of proposals for such facilities. The DPD states that temporary permission will be granted providing need has been demonstrated and the proposal is in accordance with the Key Development Criteria. It will be necessary for the authority to be satisfied that the proposal would not give rise to unacceptable impacts in terms of noise, air quality, traffic, contamination and visual disturbance.

Objections have been raised by residents, whose concerns are regarding; traffic, noise, air quality, contamination and visual impact. However, subject to appropriate conditions, no objections are raised by technical consultees including: the County Highway Authority; the Environment Agency; the County's specialist consultants on noise and air quality; and the Borough Council's development management or environmental protection team.

Officers consider, subject to imposition of conditions that the proposed ARF would not give rise to unacceptable environmental or amenity impacts and accords with the development plan. A need has been demonstrated for the ARF in order to maintain a steady and adequate supply of recycled aggregates in the short term in accordance with the DPD targets, and will also assist with the restoration of the quarry. Officers consider that the ARF may be permitted for a temporary period, as an exception to policy given the very special circumstances which exist and the lack of any other harm to the Green Belt.

The recommendation is to PERMIT subject to conditions

APPLICATION DETAILS

Applicant

Cappagh Public Works Ltd

Date application valid

2 December 2016

Period for Determination

3 March 2017 (extended on agreement with the applicant)

Amending Documents

Noise Assessment Report Dated 09 May 2017

Response to 'Dust Pollution' – letter dated 09 May 2017

Agent Letter dated 10 May 2017 (by email)

SUMMARY OF PLANNING ISSUES

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

	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the report where this has been discussed
Waste Management Issues	Yes	24 - 30
Highways, Traffic and Access	Yes	31 - 34
Noise	Yes	36 - 39
Air quality (dust)	Yes	40 – 43
Biodiversity and ecology	Yes	44 – 45
Drainage and surface water	Yes	46 – 48
Visual impact	Yes	49 – 51
Green Belt	No	52 - 59

ILLUSTRATIVE MATERIAL

Site Plan

Location Plan

Aerial Photographs

Aerial 1

Site Photographs

Figure 1 – Site entrance off Byfleet Road

Figure 2 - Site haul road

Figure 3 – Existing mineral processing plant (no longer in use)

Figure 4 – C,D&E waste stockpiles and processing area

Figure 5 – Plant site area and existing C,D&E waste stockpiles

Figure 6 – Mobile screening equipment

BACKGROUND

Site Description

- 1 Addlestone Quarry (also known as Wey Manor Farm) covers an area of some 61ha, within the Green Belt, to the east of New Haw, between Addlestone and Byfleet. Prior to the commencement of mineral extraction in 1995, the land was mainly agricultural. The site is bounded by an embanked railway line to the south, with woodland to the north, west and east. The Wey Navigation lies to the north and west, with an electricity switching station and housing development off Byfleet Road (A318) to the south and west of the proposed recycling site. The Brooklands Industrial Park, Brooklands Hotel and Mercedes Benz World lie to the south and south east on the opposite side of the railway embankment.
- 2 The proposed recycling facility, including access road comprises an area of approximately 1 ha, and will occupy part of the existing aggregate processing plant site area, which lies adjacent to the railway embankment, some 300m north east to the rear of the electricity switching station. The plant site is accessed via an established long haul road some 900m off Byfleet Road, sharing the entrance with the electricity switching station. The Brooklands Industrial Park and Hotel are sited some 170 and 220m to the south east on the other side of the railway embankment are the closest receptors to the recycling operational plant site area. Wey Manor Farm is the closest residential property to the proposed recycling operational plant site area, approximately 430m to the north west. The residential properties along Byfleet Road lie within 45m of the site entrance however they are over 650m from proposed aggregate recycling site area.
- 3 The application site is situated within the Environment Agency Flood Risk Zone 2, but is already used for the processing of sand and gravel from the permitted quarry. Three areas of ancient woodland to the south west and west lie adjacent to the existing sand and gravel processing plant site area. Public Footpath 12 lies some 40m to the north of the recycling facility and runs in a south east to north west direction.

Planning History

- 4 In October 1990 planning permission was granted on appeal (ref. APP/B3600/A89/133939) for the extraction of sand and gravel, erection of a processing plant, importation of inert waste material and the restoration of the site to agriculture and a landscaped lake.
 - Extraction of sand and gravel commenced in 1995, which meant that the completion of operations and removal of all buildings, plant, structures and works was due in 2003.
 - In November 2004 planning permission was granted (ref: RU01/0718) to allow an extension in time for the development until 31 December 2009.
 - A further extension in time was submitted as a result of landfilling operations at the site falling behind schedule due to the economic downturn and the scarcity of

7

appropriate fill materials. After a period of abeyance until the Minerals Plan Core Strategy was approved, planning permission (ref. RU09/1103) was granted in December 2015 to retain the plant and continue extraction of sand and gravel, with progressive restoration of the site with inert waste by 31 December 2020.

THE PROPOSAL

5 The operator is seeking temporary planning permission until 31 December 2020 for the siting and operation of an aggregate recycling facility (ARF), which is to be located on part of the existing aggregate plant site area (site of mortar plant, now removed). The facility is in part retrospective, as some recycling has commenced utilising mobile plant to screen both imported waste materials and site-derived sand and gravels. The mobile plant will be used to recycle construction, demolition and excavation (CD&E) waste, involving the mobile crushing and screening plant to enable the recovery of recycled aggregates for sale and export. The proposed layout comprises of the following:

- Material storage area located adjacent to the northernmost boundary of the application site;
- Mobile crushing plant (4.5m high x 15.81m in length) located centrally on existing concrete pad;
- Mobile screening plant (4.5m high x 14.9m in length) located adjacent to mobile crushing plant;
- Existing access road adjoining concrete pad and running south west.

Waste material for landfilling is to be stored on the existing stockpile area for material. Existing in/out weighbridges and two-storey office building to south west of application site are to be retained. Dust suppression sprays will be installed on the crusher in accordance with the manufacturer's specification. A bowser will be retained on site to damp down roadways during dry weather.

6 At present, the Quarry currently exports natural Bagshot sand and small amounts of shingle. Once the proposed ARF is in place, the Quarry will be capable of exporting recycled shingles, SUDS material and sub-base material. Graded aggregates will be manufactured from selected demolition and excavation materials, principally concrete break out and tarmac planings, imported from excavation and demolition contracts in the area. These aggregates will be used by Cappagh to service local contracts or customers. The majority of the material will come from and/or be sold in the Addlestone, Byfleet, Weybridge, Woking, Chertsey, Staines and surrounding area.

7 The proposed facility will process approximately 100,000 tonnes of C,D&E waste per annum, with around 70,000 tonnes of recycled aggregate being produced, with the remaining 30,000 tonnes of residual waste being used in the restoration of the wider quarry site. On the basis of the anticipated throughput, the average number of HGV movements per day importing material to the site for recycling would be 20 HGVs per day (40 movements), with 14 HGVs (28 movements) for the exported recycled aggregate. Under the current permission for the site there is a limit of 200 HGV movements per day. The combined HGV movements associated with the proposed facility and current permission will operate below this 200 HGV movement limit, therefore the proposal does not seek to increase the number of permitted HGV movements at the site.

8 The proposed facility would operate under the current permitted operational hours of 07:00 and 17:30 Mondays to Fridays, 08:00 and 13:00 Saturdays (subject to the proviso that no lorries shall leave the site before 07:30 on weekdays and Saturdays) and there will be no working on Sundays, Bank Holidays, Public Holidays or National Holidays.

- 9 The applicant has stated that the presence of the proposed aggregate recycling facility would assist in securing earlier restoration of the mineral workings due to the economies of scale and the ability to attract more waste to the site. The residual waste from the recycling operation would be directly landfilled as part of the already permitted operations rather than being sent off site.

CONSULTATIONS AND PUBLICITY

District Council

- 10 Runnymede Borough Council: No objection

Consultees (Statutory and Non-Statutory)

- 11 Elmbridge Borough Council: No objection
- 12 Environment Agency: No objection
- 13 Heathrow Airport Safeguarding: No objection
- 14 County Air Quality Consultant: No objection
- 15 County Noise Consultant: No objection
- 16 Local Lead Flood Authority (LLFA): No objection
- 17 County Highways Authority: No objection
- 18 County Ecologist: No objection
- 19 Rights of Way: No comments received
- 20 Environmental Assessment: EIA not required

Parish/Town Council and Amenity Groups

- 21 Wey Manor Residents' Association: No comments received

Summary of publicity undertaken and key issues raised by public

- 22 The application was publicised by the posting of 1 site notice and an advert was placed in the local newspaper. A total of 96 of owner/occupiers of neighbouring properties were directly notified by letter. To date 24 letters of representation have been received, objecting to the proposed development, raising the following points:
- Entrance to site contaminated with debris due to wheel cleaning facilities not being used properly;
 - Damage to kerbs, traffic islands, pavements at junction with Byfleet Road;
 - Concern over dust and noise impacts;
 - How will the site be monitored;
 - Traffic congestion and can operational movements be changed;
 - Departure from Development plan;
 - Site entrance in residential area, and access on to busy A318 single lane (each way) road;
 - Dust assessment not taken into account impact on Byfleet road residents;
 - Health risks to residents of Byfleet Road, particularly from HGV diesel fumes;
 - Increase in HGVs unacceptable, current 200 per day already permitted;

- Lorries are too big and dangerous for the road, causing damage and vibration;
- Restoration and closure of this site is long overdue, originally set at 2003, but later extended, and with no extraction since 2011;
- No need to bring material off the site, it should all be used for restoration;
- Visual impact of screening equipment, which is over 50 feet high;
- Contamination of water and soils due to leaching;
- Neighbour notification should extend beyond 90m to include all residents on Byfleet Road;
- Particulate levels (PM10 and PM2.5) may well be exceeded and application does not satisfy Policy DC3 of the Surrey Waste Plan 2008 (i.e. '*adverse effects on neighbouring amenity*') or NPPF (i.e. '*must not contribute any unacceptable levels of air pollution*')

A letter was also received from the local MP asking for advice on this application, following receipt of a letter from a resident.

PLANNING CONSIDERATIONS

Introduction

- 23 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 paragraph. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations. In this case the statutory development plan for consideration of the application consists of the Surrey Minerals Plan 2011, Aggregates Recycling Joint DPD for the Minerals and Waste Plans February 2013, Surrey Waste Plan 2008, and the Runnymede Borough Local Plan Second Alteration 2001 (Saved Policies 2007). The National Planning Policy Framework (NPPF) 2012, the national Planning Practice Guidance (PPG) 2014 and National Planning Policy for Waste (NPPW) 2014 are material considerations. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. In this case the main planning considerations are: waste management issues; highways, traffic and access; biodiversity and ecology; noise and air quality; drainage and surface water; visual impact; and Green Belt.

Waste Management Issues

Surrey Minerals Plan (SMP) 2011

Policy MC1 – Location of mineral development in Surrey

Policy MC5 – Recycled and secondary aggregates

Surrey Waste Plan (SWP) 2008

Policy CW4 – Waste Management Capacity

Policy CW5 – Location of Waste Facilities

Policy WD3 – Recycling, Storage, Transfer of Construction and Demolition Waste at Mineral Sites

Aggregates Recycling Joint DPD for the Minerals and Waste Plans February 2013

Policy AR3 – Aggregates recycling at mineral sites

Policy context

- 24 SMP2011 Policy MC1 states that priority for locating aggregate recycling development will be given to urban areas particularly in north west Surrey and to temporary use of mineral sites to be restored with inert fill. Policy MC5 states that the Mineral Planning Authority (MPA) will make provision for the supply of recycled and secondary aggregates of 0.8mtpa by 2016 and of at least 0.9mtpa by 2026. The Aggregates Recycling Joint

DPD Policy AR3 identifies the existing quarry plant and processing area as a preferred site, and states that temporary planning permission will be granted in accordance with the SWP2008 (Policy WD3) for aggregates recycling, where need has been demonstrated and provided that the development meets the key development requirements set out in the Primary Aggregates DPD. The relevant key development criteria include: access; local amenity; biodiversity; hydrology; and restoration.

- 25 SWP2008 Policy CW4 states that planning permissions will be granted to enable sufficient waste management capacity to be provided, in order to; manage the equivalent of the waste arising in Surrey, together with a contribution to meeting the declining landfill needs of residual wastes arising in and exported from London; and, achieve the regional targets for recycling, composting, recovery and diversion from landfill by ensuring a range of facilities is permitted. Policy CW5 states that waste facilities will be considered in accordance with the certain principles and priority will be given over greenfield land to mineral workings. Policy WD3 states that planning permissions for development involving recycling, storage and transfer of construction and demolition waste at minerals sites provided that the proposed development is for a temporary period commensurate with the operational life of the mineral site.

Need

- 26 The development plan policy AR3 states that there has to be a demonstration of need for the proposed ARF. The applicant has stated that they are leading civil engineering contractors providing expertise for public utilities such as gas, water, sewer and highways. They are also leading producers of high quality recycled aggregates both for their own use in supplying local authorities and the utility company contracts and the recycled aggregate market generally. The applicant goes to state that there are clear co-locational advantages in establishing an ARF at the quarry site, utilising the existing infrastructure, in terms of the existing plant site area, which includes offices, weighbridges, existing hardstanding and the established access road. Material being brought to the site to restore the mineral workings can first be crushed and screened to produce recycled aggregate with the remainder retained for restoration. The location of the ARF at the site will assist and support the restoration of the site. The applicant has stated that the C,D&E waste will come from and / or be sold primarily in the Addlestone, Byfleet, Weybridge, Woking, Chertsey, Staines and surrounding areas.
- 27 The applicant has referred to the Surrey Aggregates Recycling Joint DPD (2013) and the Surrey Local Aggregate Assessment (LAA) December 2015, which has provided a review and assessment of ARF sites within Surrey, and demonstrates a local need for such a facility at the Addlestone Quarry Site. The LAA has been subsequently updated in December 2016, which confirmed that the sales of recycled and secondary aggregates have increased annually from 0.25 mt in 2007 to 0.83 mt in 2015. The SMP 2011 target is for at least 0.8 mtpa by 2016 and 0.9 mtpa by 2026. The target to produce at least 0.9 mtpa by 2026 is likely to prove more challenging this is because a number of temporary permissions for aggregates recycling on existing mineral workings are due to have expired by 2022.
- 28 Details have been submitted of the existing permanent ARF sites in Surrey, however the applicant has stated that none of the sites produce the same type of material as proposed at Addlestone Quarry, and there is limited if any overlap in terms of the market areas / sources of supply. In terms of temporary ARF's only two sites are identified which produce similar material and have some overlap in market area to that proposed at Addlestone Quarry. The first site is Hithermoor Quarry, which has temporary permission until 2022. The other temporary permission is at Shepperton Quarry, and expires in May 2017 however an application has been submitted to retain this until 2019 (undetermined as of this report date). The applicant has noted that the review clearly demonstrates that there are an extremely limited number of sites which produce the same kind of materials which the Addlestone ARF will produce and which serve the same market area.

- 29 Officers consider that the applicant has adequately demonstrated that there is a need for the temporary ARF at Addlestone Quarry, in accordance with the Aggregates Recycling Joint DPD. The development would enable production of recycled aggregates to be maintained at the ambitious supply target of at 0.8mtpa in the short term. The development would also need to meet the key development requirements set out in the Primary Aggregates DPD. The relevant key development criteria include: access; local amenity; biodiversity; hydrology; and restoration. Given the sufficiently clear need case for the development proposed in contributing towards the County targets for the supply of recycled and secondary aggregates and the appropriateness of the existing quarry plant site location to receive the proposed throughput, the proposal would comply with Surrey Minerals Plan 2011 Policy MC5, Aggregates Recycling Joint Development Plan 2013 Policy AR3 and SWP 2008 Policy WD2. The relevant Key Development Criteria from this site's allocation in the Aggregates Recycling Joint DPD 2013 are considered below in the relevant sections of this report.

Highways, Traffic and Access

Surrey Waste Plan 2008

DC3 General Considerations

Runnymede Borough Local Plan (RBLP 2001) Second Alteration (Saved Policies 2007)

Policy MV4 – Access and Circulation Arrangements

Policy Context

- 30 SWP 2008 Policy DC3, states that the information expected to accompany planning applications includes: an assessment of the level and type of traffic that would be generated; and an assessment of the impact of that traffic, the suitability of the access to the site and the highway network in the vicinity of the site (including access to and from the motorway and the primary route network). Policy DC3 also requires adverse effects on neighbouring amenity including transport impacts to be assessed. RBLP 2001 Policy MV4 states that all development proposals will be expected to comply with current highway design standards. It goes on to state that the Borough Council will seek to ensure that arrangements for access and circulation are appropriate to the type of development proposed and the area in which it is located and that development does not aggravate traffic congestion, accident potential or environmental and amenity considerations in the vicinity.

Assessment

- 31 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 ARF would not exceed the existing highways limit of 200 movements per day, on a 5 day average. This is currently conditioned under the current planning permission (ref. RU09/1103) for the operating quarry site, and has been the operational limit since 1995, when extraction commenced at the site. The applicant anticipates that approximately 100,000 tonnes of material would be imported for recycling each year. Of this, around 70,000 tonnes would be suitable for re-use and exported from the site and the majority of the remaining 30,000 tonnes landfilled in the existing void space at Addlestone Quarry. The applicants estimate that the importation of 100,000 tonnes per annum would generate 20 loads per day (40 movements) and that the exporting of 70,000 tonnes per annum would generate 14 loads per day (28 movements). Assuming that all vehicles are only loaded in one direction, this would result in a total of 68 movements per day. The applicants stated intention however 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 are likely to have control over the vehicles in order to be able to achieve this. Assuming 80% backhauling, the total traffic generation of the proposal will be 46 movements per day.

Even with just 10% backhauling the figure would be 66 movements per day, which is much less than the current permitted limit of 200 movements per day for the quarry site.

- 32 Residents have raised concern over the impact of the HGVs in terms of the physical damage to the highway and verges, mud on road, congestion, but also the health impacts on air quality. The impacts of this level of HGV movements on the local highway, traffic generation and access were originally assessed to be acceptable, when planning permission was granted on appeal in 1990, and again when planning permission ref. RU09/1103 granted in December 2015 to retain the plant and continue extraction of sand and gravel, with progressive restoration of the site by 31 December 2020. It was considered that this level of HGV movements would not have any significant adverse traffic impacts and notwithstanding the proposed development, the site can already accept this level of HGV traffic. The emissions from traffic will be considered under the section on air quality below. Planning Enforcement/Monitoring Officers have recorded in their site visits during 2016, and early 2017 that the approach road to the site (Byfleet Road) was clean in both directions and free from any site derived extraneous matter. The Environment Agency also makes regular visits and ensures that site operations are in accordance with the waste permit.
- 33 The CHA (Transport Development Planning) have stated that in view of the limit (200 movements) on the number of HGVs, with no increase above that already permitted at the Addlestone Quarry site, they raise no objection in terms of highway traffic, access and safety. 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 (approx. 700m) is maintained and kept free of mud and other debris. The same condition will be recommended, ensuring that the cumulative HGV traffic does not exceed that already permitted. Officers accept the validity of the information submitted by the applicant and that the proposal should not give rise to traffic levels that will exceed the current limits in place and accordingly the proposal is acceptable on highway, traffic and access grounds, and complies with the relevant development plan policy.

ENVIRONMENTAL AND AMENITY ISSUES

Surrey Waste Plan (SWP) 2008

Policy DC3 - General Considerations

Surrey Minerals Plan (SMP) 2011 – Primary Aggregates DPD

Key Development Criteria (KDC) Addlestone Quarry - Preferred Area A

Aggregates Recycling Joint DPD for the Minerals and Waste Plans February 2013

Policy AR3 – Aggregates recycling at mineral sites

Runnymede Borough Local Plan (RBLP 2001) Second Alteration (Saved Policies 2007)

Policy NE20 – Species Protection

Policy SV2 – Flooding

Policy SV2A – Water Quality Protection

Policy Context

- 34 The KDC as referred to under Policy AR3 of the Aggregates Recycling Joint Development Plan Document (set out in Appendix 1 of Primary Aggregates DPD) includes the following relevant points: '*Local Amenity ...mitigate potential environmental impacts of noise and dust, and visual impact, on adjoining residents.*' RBLP 2001 Policy states that the Borough Council in conjunction with the Environment Agency will seek to manage the floodplain environment and achieve appropriate flood alleviation in the Borough. Policy SV2 states that within the area liable to flood as shown on the Proposals Map, development will not normally be permitted for new residential or non-residential development, including extensions, unless it can be demonstrated to the satisfaction of the Borough Council, following consultation with the Environment Agency, that the proposal would not of itself, or cumulatively in conjunction with other development: i) impede the flow of flood water; ; or ii) reduce the capacity of the flood

plain to store flood water; or iii) increase the number of people or properties at risk from flooding. Policy SV2A states that the Borough Council will resist development which in its opinion, after consultation with the Environment Agency, could adversely affect the quality of surface water or groundwater.

- 35 SWP 2008 Policy DC3 requires that applications for waste related development be accompanied by sufficient information to show that the proposals will not significantly adversely affect people, land, infrastructure and resources. In respect of the proposed development relevant matters are noise, air quality, biodiversity, surface water, visual impact and proximity of residential properties. However, it is important to stress that the NPPF (Para.122) states that, in decisions to help prevent unacceptable risks from pollution, local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes via the Environment Agency. Local planning authorities should assume that these regimes will operate effectively. The NPPW (Section 5) states that waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against a number of criteria, such as protection of water quality and resources and flood risk management, landscape and visual impacts, air emissions (including dust) and noise.

Noise

- 36 A detailed noise assessment was carried out in 2015 when planning permission was granted for the extension of working and restoration of the quarry until 2020, which included operations within the plant site area. The proposed development involves the siting of an aggregate recycling facility on an existing concrete base in the north east section of the plant site, which was the formerly occupied by a mortar plant facility (now removed). The current permission for the site includes noise conditions to cover all operations within the operational quarry site, including the plant site area.
- 37 The applicant submitted an updated noise assessment of the proposed recycling equipment (crushing and screening) located on the north east section of the plant site area. The applicant identified the nearest receptors being Wey Manor Farm to the north west, residents on Byfleet road to the west and the Brooklands hotel to the north east. The County Noise Consultant (CNC) requested a revised noise assessment to provide clarification on certain matters, including: further assessment in respect of the crushing equipment due to the impulsive nature of the equipment and a cumulative assessment taking into account of existing operations on site. This was provided by the applicant in a revised noise report dated 9 May 2017.
- 38 Residents raised concern in respect of noise and vibration, in respect of the recycling equipment and HGV traffic associated with the development. The CNC has assessed the revised noise report and concluded that the recycling facility would be acceptable, subject to the existing operational noise condition (restricting noise levels up to a maximum level of 55 dB LAeq 1 hour¹), being applied to any permission granted, which also specifically refers to the nearest noise sensitive receptors. This is in accordance with Government guidance (NPPG 2014).
- 39 Officers therefore consider that there would be no reason to refuse this application on noise grounds, subject to appropriate conditions. The application therefore complies with the SWP 2008 Policy DC3 in respect of noise and vibration.

¹ LAeq - Equivalent continuous noise level. Noise is generally a constantly varying level and various scales and indices are used to describe it. The equivalent continuous noise level, measured in dB(A) is the sound level of a notional continuous noise that would have the same acoustic energy as the actual fluctuating noise for a particular period of time.

Air Quality (dust)

- 40 The applicant has submitted an assessment of the proposed ARF and its impact on air quality, including a dust impact assessment and further details in response to resident's concerns on 'dust pollution'. The air quality assessment followed Institute of Air Quality Management (IAQM) guidance, taking into account the nature and scale of the recycling processes, together with the nearest potentially sensitive receptors and demonstrated that the proposed ARF would not have an unacceptable impact in terms of air quality and dust. The assessment concluded that the ARF with the designed-in mitigation (suppression sprays on the crusher) and good practice management measures including site bowser, the potential for impacts from dust are effectively reduced to give little rise to negligible effects at the nearest sensitive receptors.
- 41 Neither the NPPW nor the waste section of the NPPG provides specific direction on dust assessment methodology for waste planning applications however the NPPG (under minerals) states that there should be five stages to a dust assessment study:
- *establish baseline conditions of the existing dust climate around the site of the proposed operations;*
 - *identify site activities that could lead to dust emission without mitigation;*
 - *identify site parameters which may increase potential impacts from dust;*
 - *recommend mitigation measures, including modification of site design*
 - *make proposals to monitor and report dust emissions to ensure compliance with appropriate environmental standards and to enable an effective response to complaints.*

The IAQM guidance addresses each of these five stages and in the absence of specific guidance the CPA expects applicants for waste development applications to follow the IAQM guidance, with appropriate modifications/amendments. The County Air Quality Consultant (CAQC) assessed the submitted dust assessment against the IAQM guidance and agreed with the conclusions of the assessment, and whilst they agreed monitoring would be disproportionate, it was suggested that regular visual inspections be undertaken with active monitoring of complaints. This will act to verify the conclusions of the assessment.

- 42 Residents have raised concerns over the assessment and the impact on their properties the majority of the representations received are on/off Byfleet Road, which lie over 650m from processing site area. The issues raised include health risks and level of dust and particulates, one resident going into detail about levels of PM₁₀² and PM_{2.5}. In respect of PM₁₀ the CAQC agreed with the applicant that this can be scoped out, as the levels of this particulate matter at the site are well below the accepted air quality limits (Air Quality Regulations 2010) and are unlikely to exceed these AQ limits. The CAQC has agreed with the applicant's assessment, which identified the sensitive receptors to PM₁₀ and dust deposition being within 250m, which is the commercial development on the opposite side of the railway embankment, i.e. the Brooklands Industrial Park and Hotel. Dust from the ARF would be greater than PM_{2.5}, (a much finer dust); as such the effects from this would be minimal. Concerns were also raised in respect of the emissions from HGV traffic. However, as mentioned above there is no proposed increase in HGV traffic over and above that already permitted and considered acceptable for the operational quarry site, including the plant area.
- 43 While the concerns of local residents are acknowledged, no objection has been raised by the CAQC and Runnymede Environmental Health Officers subject to appropriate

² PM – particulate matter consists of a mixture of solid and liquid particles suspended in the air. Commonly used indicators describing PM refer to the mass concentration of particles with a diameter of less than 10 µm (PM10) and of particles with a diameter of less than 2.5 µm (PM2.5). PM2.5, often called fine PM.

conditions and the application of the existing quarry dust management plan in respect of the ARF. No residential properties fall within 250m, with Byfleet Road residents over 650m to the south and south west of the aggregate recycling plant, with a prevailing south westerly wind direction. Planning officers consider appropriate dust and air quality assessments have been undertaken. The proposed and existing mitigation and control measures should ensure there would be no significant adverse impact from nuisance dust on nearby receptors. There is no proposed increase in vehicle numbers as such there would be no increase in impacts on air quality from emissions. As such planning officers consider the proposal is consistent with the aims and objectives of national policy and guidance and relevant development policies relating to air quality.

Biodiversity and Ecology

- 44 The applicant has submitted an ecological assessment considering the proposed ARF in the context of the wider site and in the context of previous ecological assessments undertaken, particularly for the planning permission for the continued working and restoration of the site until 2020. The applicant concluded that the proposed ARF would not directly impact any significant ecological features on or adjacent to the application site. However, the applicant has suggested certain mitigation measures in respect of protecting the ancient woodland in the locality.
- 45 The County Ecologist (Countryside Management & Biodiversity Manager) has raised no objection to the proposal, subject to a condition, ensuring the northern boundary is clearly marked, to prevent encroachment of the woodland beyond. Officers consider that no material adverse impact would result on biodiversity and ecology, accordingly, the aims, objectives and requirements of national policy in relation to conserving and enhancing the natural environment and, relevant development plan policies have been met.

Drainage and surface water

- 46 The applicant has submitted a Flood Risk Assessment (FRA) considering the proposed ARF in the context of the wider site; in addition the previously submitted FRA has been submitted following pre-application advice. The assessment concluded that:
- *The risk of fluvial flooding is considered to be low and appropriate to the development sensitivity.*
 - *The development will not involve any new buildings or the construction of hard standing and therefore will not increase runoff and will not exacerbate flood risk.*
 - *The impact of the proposals on the volume and rate of storm water runoff from that site will be neutral – runoff will continue to be directed into the site via existing pathways.*
- 47 Residents raised concerns in respect of contamination from the inert waste stockpiles; however the nature of the waste is inert and controlled via the Environment Agency permitting process. The Environment Agency and Environmental Health Officer have raised no objection.
- 48 The scheme of surface water management is covered under the planning permission for the plant site area planning permission (ref.RU09/1103). The Lead Local Flood Authority (LLFA) commented that as there are no changes to the existing hardstanding in the plant site area, and no changes to the existing drainage system, there is no objection to the development on flood risk grounds. Officers consider that there would be no reason to refuse this application on flood risk, water quality, groundwater, and land drainage or land contamination grounds. As such, the application complies with the SWP 2008 Policy DC3 and RBLP 2001 Policies SV2 and SV2A.

Visual impact

- 49 The KDC in Appendix 1 of Primary Aggregates DPD requires that the visual impact and the impact on local amenity needs to be considered. The applicant has stated that area surrounding the application site predominantly comprises an active mineral working site and the application site itself comprises the location of the former mortar plant. The proposed location of the ARF plant is characterised by the existing quarry operations, with various existing stockpiles of material flanking the northern and western boundaries of the application site, with a 5m railway embankment marking the east boundary. The site is well screened by mature trees and in the context of the existing operations on the site; the applicant considers that the proposed ARF would not have a significant impact on visual amenity.
- 50 The proposed ARF plant and equipment would be up to 5m in height, which needs to be assessed in the context of the wider plant site area containing much larger sand and gravel processing equipment, up to 15m in height. The ARF would therefore not dominate the wider plant site area and be lower in height than the previous mortar plant and silos, which were approximately 16m in height.
- 51 Residents have raised concern over the visual impact, claiming the plant to be over 50 feet in height, which is incorrect. Given the 5m height and location of the ARF plant, being screened by woodland, and over 650m from the Byfleet Road residents, Officers do not consider that the ARF site would be visible to any residents on Byfleet Road. In view of the existing operating plant site and location, Officers consider that the proposed development is acceptable in terms of appearance and visual impact considerations and accords with the development plan policies.

Green Belt

Surrey Waste Plan 2008

Policy CW6 – Development in the Green Belt

Runnymede Borough Local Plan 2001

Policy GB1 – Development within the Green Belt

Policy context

- 52 The fundamental aim of Green Belt Policy to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green belts are their openness and their permanence. Paragraph 87 of the NPPF states that as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green belt and should not be approved except in very special circumstances. Paragraph 88 states that when considering any planning applications, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, and goes on to say that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 53 Policy CW6 of the Surrey Waste Plan 2008 states that there will be a presumption against inappropriate waste related development in the Green Belt except in very special circumstances. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Policy CW6 goes on to state that the characteristics of the application site and wider environmental and economic benefits of sustainable waste management may contribute to very special circumstances.
- 54 Saved Policy GB1 of the RBLP 2001 states that within the Green Belt except for the area within the settlement of Thorpe, there will be a strong presumption against development that would conflict with the purposes of the Green Belt or adversely affect its open character.

- 55 Addlestone Quarry is allocated in the SMP 2011 Policy AR3 for aggregate recycling, where temporary planning permission will be granted in accordance with the requirements of Policy WD3 of the SWP 2008. Development proposals for waste development under WD3 states that permission will be granted for temporary periods commensurate with the operational life of the mineral site and in the case of Green Belt sites, it accords with Policy CW6.

Green Belt Assessment

- 56 *Harm* - The application site is located within the Green Belt and is an area where a temporary planning permission exists until 2020 for the quarry operational plant site area. The location of the ARF plant would be sited on the area which formerly had the permitted mortar plant, which has now been removed. The proposed waste management operations (aggregate recycling facility) are not deemed to be compatible with the objectives of the Green Belt and maintaining openness and are therefore considered to be inappropriate development. However, the proposal would not increase the footprint of the plant site area, and would assist in providing inert waste for the restoration of the quarry site and so assist in the objective of progressive and timely restoration for mineral workings. While the proposal is temporary Officers consider that it would have a moderate impact on the openness of the Green Belt at the plant site given the increased level of activity including the operation of mobile plant.
- 57 *Very special circumstances* - Inappropriate development may only be permitted where very special circumstances are demonstrated to outweigh the harm caused by inappropriateness and any other harm. Therefore it is for the applicant to demonstrate that there are very special circumstances that overcome harm to the Green Belt. The applicant has provided a list of factors, which they consider amount to very special circumstances that outweigh the harm to the Green Belt. The applicant's list included the following:
- *It is considered that need for the facility has been demonstrated, the proposed will make a positive contribution in terms of reaching and potentially exceeding recycled aggregates targets;*
 - *Co-location of the temporary ARF on a mineral workings further securing the timely restoration of the site, in accordance with policies CW5, WD2 and WD3;*
 - *The ARF would assist with attracting a greater volume of higher quality CD&E waste;*
 - *Locational suitability of the site has already been assessed in some detail as part of its allocation within the Aggregates Recycling DPD;*
 - *Site is well located to source of waste arisings and to sources of demand for recycled aggregates;*
 - *Residual waste from the recycling operation would be landfilled into the former mineral working rather than be sent off site, hence lessening the impact of double handling and reducing traffic movements;*
 - *Co-location of the ARF at the quarry enables export of recycled aggregate to be taken out as 'return loads' on HGVs that would already be delivering CD&E waste to the site in any event;*
 - *The output of recycled aggregate will assist in the replacement of land won resources with wider environmental benefits as a result of this form of sustainable waste management;*
 - *The ARF would be operated by the landowner who is an experienced operator in this field providing certainty that the proposal will be brought forward following grant of planning permission;*
 - *The planning permission sought would be temporary and commensurate with the operational life of the site;*

- *Only mobile plant and storage areas are proposed – no other development is proposed as use will be made of the existing on site facilities (office, weighbridge, concrete pad and haul road);*
- *HGV movements generated by the ARF will be within the cap set by the wider quarry permission recently granted and considered to be acceptable;*
- *Economic benefits derived from provision of locally based employment.*

58 The proposed aggregate recycling facility 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.

59 As the development is inappropriate development in the Green Belt it can only be permitted as an exception to policy. Officers consider that factors exist which amount to very special circumstances which outweigh the harm by reason of inappropriateness and loss of openness. These factors consist of: need to maintain the supply of recycled and secondary aggregates in the short term in accordance with the DPD; the facility will assist with the timely restoration of the mineral workings; the site is one identified in the SMP 2011 and otherwise meets the KDC for the designation. In terms of other harm, this has also been assessed above, and Officers considered that there is no other harm, subject to the imposition of conditions. Officers therefore consider that the development complies with the SWP2008 Policy CW6 and an exception to Green Belt policy can be made and temporary permission granted.

HUMAN RIGHTS IMPLICATIONS

60 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.

61 It is acknowledged that there would be an impact on the Green Belt caused by inappropriateness of the development; however the scale of such impacts is not considered sufficient to engage Article 8 or Article 1 of Protocol 1. As such, this proposal is not considered to interfere with any Convention right.

CONCLUSION

62 The application site is located in the Green Belt and therefore planning permission may only be granted where factors that amount to very special circumstances are demonstrated that outweigh the harm in terms of inappropriateness and any other harm. The proposal for an aggregate recycling facility (ARF) will be located on an existing plant site area, with an operational quarry, on the site of the former mortar plant. As such, given the scale and location of the ARF, the development is considered not to have a greater impact on openness of the Green Belt than that previously permitted.

63 Notwithstanding this moderate impact on openness, the need for the development and very special circumstances have to be demonstrated. The applicant has carried out an assessment of the existing aggregate recycling facilities within the County, and demonstrated a local need for the facility. The applicant has provided a list of factors, which Officers consider demonstrate that very special circumstances exist, and in the context of the Government waste policy, the proposal will encourage the management of waste further up the waste hierarchy in accordance with the principles of sustainable development. The proposed recycling facility will assist in meeting the needs of recycled aggregate, helping to preserve/reduce demand on primary aggregates in the short term, and in addition, assist in creating further quarry infill material to enable the timely restoration of the mineral working.

- 64 This site is identified as a site for recycled aggregate processing in Policy AR3 of the Aggregates Recycling DPD, which states that temporary planning permission will be granted in accordance with the SWP2008 (Policy WD3) for aggregates recycling, where need has been demonstrated and provided that the development meets the key development requirements set out in the Primary Aggregates DPD. Need has been demonstrated and notwithstanding the concerns of local residents in respect of the harm to the local amenity, there have been no objections from technical consultees. With regard to the key development requirements, and in view of the above assessments, Officers consider that the proposed development would not have an unacceptable impact on local amenity or Green Belt.
- 65 In conclusion, there are no policy objections in relation to the impact on local amenity in terms of highways, noise, dust and visual impact. 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 short 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 2020. Taking all these matters into account, Officers consider that an exception to Green Belt policy can be made and temporary permission should be granted subject to suitable planning conditions.

RECOMMENDATION

The recommendation is to PERMIT subject to the following conditions:

Conditions:

Time limits

1. All importation, deposit, storage and processing of construction, demolition and excavation waste and export of materials arising from this process shall cease by 31 December 2020.
2. All buildings, plant, conveyor belts, machinery both fixed and otherwise, and any engineering works connected therewith on or related to the application site (including any hard surface constructed for any purpose) shall be removed from the application site by 31 December 2020 and the land where such works stood restored in accordance with approved restoration for Addlestone Quarry, Drawing No. P1/876/16 Revision E dated 22 July 2015.

Permitted Development Rights

3. Notwithstanding the provisions 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.

Hours of operation

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

07:00 and 17:30pm Mondays to Fridays
 08:00 and 13:00 Saturdays

subject to the proviso that no lorries shall leave the site before 07:30 on weekdays and Saturdays.

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

Highways, Traffic and Access

- 5 In combination with planning permission for the quarry site (ref. RU09/1103 dated 11 December 2015), the average accumulative number of HGV movements to and from the site shall not exceed 200 per day (on a 5 day average). Records of HGV movements to and from the site shall be maintained for up to 1 year at any one time and shall be submitted to the County Planning Authority on a quarterly basis, on the following months; May, August, November, February.

Dust

- 6 At all times during the carrying out of operations authorised or required by this permission, water bowsers, sprayers, whether mobile or fixed, or other similar equipment, shall be used to minimise the emission of dust from the site. Loaded vehicles importing inert material shall be sheeted or covered to minimise dust. Best working practice shall be utilised to minimise the emission of dust during the loading and deposition of materials.
- 7 No operation authorised or required by this permission shall cause visible dust beyond the site. Should visible dust be caused beyond the site, work shall be suspended until it can be resumed without causing visible dust as a result of different methods of working, the addition of further dust suppression measures or changed weather conditions.

Noise

- 8 Noise levels from the development hereby permitted, at specified noise sensitive properties (see Table 1 below) shall not exceed the existing/pre-works representative background noise level (LA90,1h, freefield) by more than 10 dB(A), or as near this level as practicable, up to a maximum noise level of 55 dB LAeq, 1h (free field).

The existing representative, daytime LA90 background noise level shall be determined by measurement that shall be sufficient to characterise the environment and the recommended level should be justified following guidance contained within British Standard BS4142:2014.

Table 1: Noise Sensitive Properties referred to in Condition 8 above.

Property Name	Location	Postcode
Coxes Mill	Bourneside Rd, Addlestone	KT15 2JX
14 Wey Meadows	Weybridge	KT13 8XY
Westfield Court	Byfleet Road, New Haw	KT15 3LG
20 Birch Close	New Haw	KT15 3JT
1 Kashmir Close	New Haw	KT15 3JD

35 Bates Walk	Addlestone	KT15 2DQ
Iver Cottage	Canal Bank, Addlestone	KT15 2SH
Kildare	Canal Bank, Addlestone	KT15 2SH
Wey Manor Cottage	Wey Manor Road, New Haw	KT15 3JR
Wey Manor Farm	Addlestone	KT15 3JR

Where noise levels exceed the levels specified, operations shall cease until such time that appropriate measures can be set in place to ensure compliance with the specified levels.

Ecology

- Materials shall only be stored in the proposed 'Material Storage Area' as marked on the 'Site Layout Plan' Drg No.2707/11 dated Feb 16, and the northern boundary of the site shall be marked out with a solid line of 1 metre high concrete blocks at all times to contain the limit of the stockpiles.

REASONS FOR IMPOSING CONDITIONS:

- To enable the County Planning Authority to exercise control over the site for the development hereby permitted and comply with Section 91 of the Town and Country Planning Act 1990.
- To comply with the terms of the application and to enable the County Planning Authority to exercise planning control over the development hereby permitted at a mineral working site in an area of Metropolitan Green Belt where permanent development of this type is inappropriate and to enable restoration of the land in accordance with the approved restoration scheme to comply with Schedule 5 paragraph 1 of the Town and Country Planning Act 1990 and to minimise the impact on local amenity in accordance with the terms of Surrey Waste Plan 2008 Policy DC3 and Surrey Minerals Plan 2011 Core Strategy Development Plan Document Policy MC17.
- To comply with the terms of the application and to enable the County Planning Authority to exercise planning control over the development hereby permitted at a mineral working site in an area of Metropolitan Green Belt and to minimise the impact on local amenity in accordance with Surrey Waste Plan 2008 Policy DC3.
- To enable the County Planning Authority to adequately control the development and to minimise its impact on the amenities of the local area in accordance with Surrey Waste Plan Policy DC3.
- In the interests of safeguarding the local environment and to ensure the development should not prejudice highway safety nor cause inconvenience to other highway users and to maintain the currently permitted HGV limits up until 31 December 2020 in accordance with Surrey Waste Plan 2008 Policy DC3.
- To comply with the terms of the application and ensure minimum disturbance and avoid nuisance to the locality in accordance with Surrey Waste Plan Policy DC3 and the Key Development Criteria referred to under Policy AR3 of the Aggregates Recycling Joint Development Plan Document 2013.
- To comply with the terms of the application and ensure minimum disturbance and avoid nuisance to the locality in accordance with Surrey Waste Plan Policy DC3 and the Key Development Criteria referred to under Policy AR3 of the Aggregates Recycling Joint Development Plan Document 2013.
- To comply with the terms of the application and ensure minimum disturbance and avoid nuisance to the locality in accordance with Surrey Waste Plan Policy DC3 and the Key

Development Criteria referred to under Policy AR3 of the Aggregates Recycling Joint Development Plan Document 2013.

- 9. To ensure that no material is stored beyond the site boundary, for the protection of the mixed broadleaf deciduous woodland habitats, minimising the impacts on biodiversity in accordance with the Key Development Criteria referred to under Policy AR3 of the Aggregates Recycling Joint Development Plan Document 2013 and the Surrey Waste Plan 2008 Policy DC3.

Informatives:

- 1. In determining this application the County Planning Authority has worked positively and proactively with the applicant by: entering into pre-application discussions; scoping of the application; assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its accompanying technical guidance; providing feedback to the applicant where appropriate, and issues of concern have been brought to the applicant's attention in a timely manner affording the opportunity to consider whether such matters can be suitably resolved. This approach has been in accordance with the requirements of paragraphs 186-187 of the National Planning Policy Framework 2012.

CONTACT

Stephen Jenkins

TEL. NO.

020 8541 9424

BACKGROUND PAPERS

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

Government Guidance

[National Planning Policy Framework 2012](#)

[Planning Practice Guidance](#)

The Development Plan

[Surrey Waste Plan 2008](#)

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

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

[Aggregates Recycling Joint DPD 2013](#)

Runnymede Borough Local Plan (RBLP 2001) Second Alteration (Saved Policies 2007)

Other Documents

Planning permission ref. RU09/1103 dated 11 December 2015

This page is intentionally left blank