

TO: PLANNING & REGULATORY COMMITTEE

DATE: 21 NOVEMBER
2007

BY: PLANNING MANAGER

DISTRICT(S) TANDRIDGE

ELECTORAL DIVISION(S):
GODSTONE
Mrs Marian Myland

PURPOSE: FOR DECISION

GRID REF: 534052 152089

TITLE: MINERALS AND WASTE APPLICATION: TA07/0710

SUMMARY REPORT

Land at North Park Farm Quarry, North Park Lane, Godstone

Construction of a dry silo mortar plant within the plant and quarry area of North Park Quarry, with internal access, car parking, mess room, feed hopper, fuel store, external silo storage, use of existing private access route to the public highway and associated facilities

This application is accompanied by an Environmental Statement.

The proposed development is inappropriate development located within the Metropolitan Green Belt and an Area of Great Landscape Value. An Area of Outstanding Natural Beauty is located approximately 200m to the north of the application site. North Park Farm Quarry is an operational quarry primarily extracting silica sand for utilisation within industrial processes. However, not all of the sand extracted at North Park Farm Quarry is of a quality such that it can be utilised as high grade industrial sand and is currently being exported from the site for use within the construction industry. The proposal seeks to utilise this residual sand that is intended for the construction industry within the dry silo mortar (DSM) plant. The proposal would involve the feeding of damp sand from the stockpile area by loading shovel into covered storage bins, which from there is conveyed into the DSM plant on a covered conveyor. The sand is then dried within a fluid bed dryer to 0.5% moisture and is then gravity fed through the use of a bucket system into vertical silos where it would be blended together with the other raw ingredients (imported to the site) including cement, lime and additives. The finished product would either be loaded directly on to road tanker or transferred by bucket elevator to finished product storage silos.

The DSM plant is an enclosed system. The applicant anticipates producing 100,000 tonnes per annum of dry mortar mix of which 80% would comprise of residual construction sand from the adjacent quarry and 20% of imported cement, lime and additives. The cement, lime and additives would be delivered in bulk and blown into their respective silos using the tankers' onboard blowers. Access to the DSM plant would be via the internal haul route from Junction 6 of the M25 to North Park Farm Quarry where a separate access road would be constructed direct to the DSM plant.

If planning permission is to be granted then it is necessary to be satisfied that the proposed DSM plant is needed and cannot be located elsewhere. Additionally, issues to be considered in determining this planning application are whether the proposal accords with national, regional and development plan policy. The proposal should demonstrate that any landscape, environmental and amenity impacts are suitably mitigated so as not to cause unacceptable harm.

The applicant has provided further information in support of the planning application outlining what alternative site assessment work has been carried out leading to North Park Farm Quarry being chosen as the location for locating the DSM plant. The applicant has shown within this assessment work that a site search commencing from 2005 has taken place and covered a search area to the south and south west of the M25. The applicant also considers that by locating the proposed DSM plant within an existing operational quarry this will provide benefits with regards to sustainable development removing the need to transport sand from its source to the DSM plant, as this would all take place within the quarry.

The recommendation is to PERMIT subject to conditions

APPLICATION DETAILS

Applicant

Tarmac Ltd

Date application valid

13 April 2007

Period for Determination

3 August 2007

Amending Documents

Design and Access Statement dated June 2007; letter dated 21 June 2007 and accompanying plans R92/04 and R92/05 received 25 June 2007; letter dated 25 September 2007; letter dated 2 October 2007 and accompanying "Air Quality Emission Monitoring Statement and Description of Key Control Procedures" and Environmental Policies; and letter dated 8 November 2007

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 |
|-----------------------------|--|---|
| Green Belt | Yes | 63 – 82 |
| Landscape | Yes | 83 – 91 |
| Transport and Traffic | Yes | 92 – 100 |
| Air Quality and Dust | Yes | 102 – 115 |
| Noise | Yes | 116 – 126 |
| Hydrology and Water Quality | Yes | 127 – 133 |
| Ecology | Yes | 134 – 135 |
| Pollution Prevention | Yes | 136 – 141 |

ILLUSTRATIVE MATERIAL

Site Plan

Plan

Aerial Photographs

Aerial

Site Photographs

Photograph 1 – looking northwards towards application site area

Photograph 2 – looking westwards towards application site area and as built plant

Photograph 3 – looking westwards towards application site area

Photograph 4 – looking southwards towards application site area

Photograph 5 – view to North Park Farm Quarry from the North Downs

Photograph 6 – view to North Park Farm Quarry from the North Downs

BACKGROUND

Site Description

1. North Park Farm Quarry covers some 50 hectares which includes the processing plant which covers an area of 8.5 hectares. The quarry lies in a valley between the North Downs and the Greensand Ridge with the land rising from south to north across the site. The quarry is located in a rural area between the villages of Bletchingley and Godstone with the M25 motorway to the north and the A25 to the south. The land is designated as Metropolitan Green Belt and falls within an Area of Great Landscape Value (AGLV). In addition, the northern section of the quarry falls within the Surrey Hills Area of Outstanding Natural Beauty (AONB). The current application site forms part of the quarry area. Access to the application site is gained from a purpose built haul route linking the quarry to Junction 6 of the M25.
2. The surrounding land use is predominantly agricultural, however there is a golf course to the south of the site. Kitchen Copse an area of ancient woodland that has been designated a Site of Nature Conservation Interest (SNCI), lies to the north west of the site. The nearest residential properties are to the east of the quarry on North Park Lane and to the west, at Place Farm.
3. The current application site covers some 2.14 hectares (ha) of which the dry silo mortar (DSM) plant would be located on 1ha with the balance consisting of the existing haul route which links North Park Farm Quarry with the public highway at the Godstone roundabout to the south of the M25 Junction 6. The part of the application area where the DSM would be situated would be to the south of an existing sand processing plant operated by WBB Minerals. On 19 July 2004 the County Planning Authority granted planning permission (ref: TA02/0183 & RE02/0268) for a sand processing plant and associated haul route. The quarry operator, WBB Minerals, has not built the processing plant in accordance with the existing planning permission and accordingly the processing plant as constructed does not have the benefit of planning permission.

Planning History

4. Sand working at North Park Farm commenced following the grant of planning permission (Ref. TA76/155/298) in January 1977, which allowed the winning of silica sand from a 12ha site directly west of North Park Lane. Working has been completed in this area and the land restored to a lower level. A second planning permission (Ref. TA81/796/133) was granted in May 1982. This westward extension of the previous workings involved not only the extraction of silica sand from an area of approximately 20.5ha but the regrading of the extracted site and surrounding land amounting to a total of 27.6ha. Both the 1977 and 1982 consents were granted subject to conditions including those requiring that the silica sand extracted would be transported via the A25 to the company's Holmethorpe Works, Redhill for processing and despatch.
5. An amendment to Condition 3 of the 1977 permission and Condition 10 of the 1982 permission was granted in April 1985 (Ref. TA81/796) allowing sand used for the manufacture of asphalt to be transported direct to customers rather than going via the Holmethorpe processing plant and in 1987 a five year working scheme required under Condition 21 of the 1982 permission, was submitted and approved (Ref. TA87/1103). A further 3.6ha extension to the extraction area previously permitted in 1982 was granted in July 1990 (Ref. TA90/0284). This extended the life of the site and involved the revision of the working programme approved in 1987. Details of agricultural aftercare were approved in September 1990 (Ref. TA90/0535) and details of a scheme of archaeological investigation were approved in 1991 (Ref. TA90/0284A).
6. Consent (Ref. TA90/0284/D) granted in November 1995 varied conditions 2 and 4 of planning permission TA90/0284 to enable the programme of extraction and restoration of working to be revised which extended the period of extraction until 2010 with restoration to be completed by 2015. Planning permission was granted in November 2000 (Ref. TA00/0326), for the extraction of sand from land to the south and west of North Park Farm Quarry. The application also included the progressive restoration of the whole of the site to agriculture and woodland, the retention and use of the existing mineral despatch plant and associated accesses, the temporary diversion of parts of bridleways 142 and 148 and the temporary stopping up of part of footpath 143.
7. Planning permission to construct a replacement sand processing plant, dedicated haul route, new access onto the B2235 Godstone Hill Road with associated woodland planting, landscaping and other matters was granted under planning permission Ref: TA02/0183 & RE02/0268 on 19 July 2004. Detailed schemes relating to the new access; highway cleaning; works at crossing points of the pipelines with rights of way; signage for the haul route crossing points with rights of way; groundwater monitoring; the erection of boundary fencing on the southern section of the haul route; pursuant to conditions 6, 9, 11, 12, 14, 17, 23, 24 and 35 of planning permission route Ref: TA02/0183 & RE02/0268 were approved on 14 December 2004. The bat activity survey and details required by Condition 36 were approved in February 2005 under consent Ref TA02/183/D & RE04/2397. An archaeological scheme pursuant to Condition 34 was submitted in January 2005 but has yet to be determined.
8. An application to vary Condition 22 (hours of plant construction) of planning permission Ref: TA02/0183 & RE02/0268 dated 19 July 2004 to allow plant construction works within the quarry area to be carried out between 0700 to 1900 hours Monday to Friday and 0900 to 1700 hours on a Saturday for a temporary period expiring 31 October 2005, was permitted in March 2005. The applicant sought to relax the condition only in respect of the construction of the processing plant within the existing quarry. The construction of the access, haul route and associated junctions and the installation of the pipelines, delivery of equipment for the construction of the processing plant would all remain subject to the hours set out in Condition 22.

9. Planning permission was granted on 23 June 2005 (ref: TA02/183/A1 & RE05/1115) to allow the construction of the processing plant at the site to take place at the same time as the construction of the haul route and access. All existing HGV traffic associated with the site utilises this haul route as the main form of access to the site.
10. A further planning application covering details pursuant to Conditions 26 (a scheme of restoration and landscaping); 29 (a scheme of drainage); and 31 (a scheme for the removal of the existing sand storage and dispatch silos located to the east of North Park Lane) has been submitted but has yet to be determined.
11. A planning application is currently being prepared by WBB Minerals seeking planning permission for the plant and haul route as constructed. The application is expected to be submitted at the end of November.

THE PROPOSAL

12. The applicant proposes to construct a dry silo mortar (DSM) plant, a hardsurfaced internal access road to the application area, a car parking area, an oil store, a silo storage area and four sand bins with associated hoppers within the operational part of the quarry to the south of the existing as built sand processing plant which was the subject of planning permission ref: TA02/0183 & RE02/0268 dated 19 July 2004. The whole of the application area would be hardsurfaced and landscaping works would be undertaken surrounding the application site.
13. Current practice is for mortar to be delivered to construction sites by lorry as ready to use wet mixed mortar to be utilised on site. Wet mixed mortar has to be used on the same working day as it is delivered, as if not, the product gradually hardens so that it cannot be used the following day and is therefore scrapped. This hardened mortar is normally taken to landfill for disposal.
14. A dry silo mortar process utilises the same ingredients as wet mixed mortar (sand, cement and lime alongside specialist colours or additives when required) but these are dried and pre-blended at a DSM plant. The dried mortar can be delivered to a construction site for use by road tanker where it is pumped into a site silo and as much or little water is added to produce the required amount of wet mix mortar to be used during the day by adding water via a pipe which would be connected to a mains water supply. This process can assist in reducing the amount of wet mixed mortar waste, as only that required on site is made from the dry mortar mix. There are five other sites within the UK which currently operate a DSM.
15. North Park Farm Quarry is primarily an industrial (silica) sand quarry however some of the sands within the deposit do not meet the required specialist grades for industrial use and consequently are used within the construction sector. It is these construction sands that would be utilised within the DSM plant. It is anticipated that the DSM plant would produce an output of approximately 100,000 tonnes per annum (tpa) of mortar using a mix of 80% mortar sand (80,000 tonnes) from the quarry and 20% (20,000 tonnes) of imported lime and cement in varying proportions. A small amount of additives are used to control the setting of the mortar and colourings may be used for where needs for particular development or conservation work.
16. The DSM plant comprises of a building, which is made up of three main elements:
 - a silo and mixing building 10.5m (w) x 18.4 (l) and 34m (high). This building would contain the managers office, control room and two overhead dispatch points
 - a lower level building 24.5m (w) x 22.5m (l) and 14.5m (high to the ridge and with a chimney to a height of 18m). This building would contain the fluid bed drier with a small lean to store

- a small mess room 4.5 (w) x 10m (l) and 4m (high).
17. The DSM would be located at the base of the existing quarry, which varies between 93m Above Ordnance Datum (AOD) and 94m AOD. The M25 lies at approximately 125m AOD, the village of Bletchingley between 125m and 150m AOD; and the Surrey Hills AONB is approximately 200m AOD.
 18. The process would involve moist sand being fed from existing adjacent construction sand stockpiles by a front end-loading shovel into four 25 tonne covered sand storage bins. The sand would then be metered onto a covered conveyor belt using one of the four belt feeders from beneath the storage bins. The sand would be fed over a screen to remove any oversize or fugitive material; and would be conveyed by a second covered conveyor into the main processing plant for drying by a fluid bed dryer. Once dried the sand is conveyed by an enclosed bucket elevator within the processing plant building, into storage silos. Additional silos would be located within the plant containing Portland Cement, hydrated lime, ground granulated blast furnace slag and recycled mortar mix material. All of these materials would be delivered by bulk road tankers and would be blown into the respective silos using the tankers on board blowers. Smaller units would also be used for coloured pigments and additives.
 19. The dried sand and powders would be weighed into the correct proportions within the enclosed weigh vessels before being fed by gravity into the mixer. Once the mortar has been mixed it can be discharged either directly into the road tanker or into finished product storage silos. The road tankers would be able to drive into the plant building and locate themselves underneath the loading points so that the mortar can be transferred directly into the tankers. The loading point for coloured or special recipes would use batch weights to give an accurate total load and the other loading point for ordinary mortar mix would utilise a weighbridge located at the loading point. Once loaded, the HGVs would leave the application area via the internal access link route, which would join the existing haul route leaving North Park Farm Quarry to the public highway.
 20. The heavy goods vehicles (HGVs) used in transporting in the cement and transporting out the product would predominantly be sealed tankers. The HGVs bringing in the pigment and additives would be delivered on flatbed within sealed containers. The silo storage area would enable a small number of silos to be stored on the site prior to being filled and despatched however it is anticipated that the majority of silos would remain on construction sites and be replenished by road tanker.
 21. The applicant states that by locating the DSM plant within the existing quarry where construction sands are sourced this would reduce the number of unnecessary vehicle movements that would be associated with transporting the construction sand from the quarry to a site where the DSM plant would be located and from there to sites where the mortar would be utilised for construction projects. The applicant states that this would reduce vehicle movements by 45% for the given production compared with wet mix plants. Furthermore as the mortar mix would be in a dry state this would enable it to be transported in tankers in larger volumes, 25 tonnes heavy goods vehicle, as there would not be reliance on smaller capacity trucks carrying the water within the wet mixed mortar.
 22. The applicant has stated that the proposal would not prejudice the approved restoration scheme for the site and would be removed when restoration of the proposal area is necessary. The hours of operation proposed for the DSM would be 0600 – 1900 Monday to Friday and 0700 – 1200 Saturday. The hours of operation for transport dispatch are proposed as 0600 – 1800 Monday to Friday and 0600 – 1200 Saturday. The applicant proposes no working on Sundays and Bank Holidays other than for emergency maintenance work. The applicant states that daily lorry movements would be at less than 1 per day on average. The applicant anticipates that construction would take up to approximately 7 months.

23. Currently the south east region has one DSM plant located in Colchester which serves the whole of the M25 area. The applicant anticipates that the proposed DSM plant at North Park Farm Quarry would assist in serving the south and west of the M25 area allowing the DSM plant currently located in Colchester to serve the north and east of the M25 area.

CONSULTATIONS AND PUBLICITY

District Council

Tandridge District Council

24. - Planning Department : Objection that the site lies to the south of the Surrey Hills AONB and is situated in an AGLV and the proposal would not conserve or enhance this area being visible from the AONB. That the entire site is within the Green Belt of which the proposal is inappropriate and there are no very special circumstances to justify such development. That the need for the mineral which forms part of the proposal has not been demonstrated and the proposal is not considered appropriate or sustainable. Further HGV movements at the haul route entrance/ exit at Junction 6 of the M25 would have an adverse impact particularly on Godstone and that the HGV movements are unacceptable.
25. - Environmental Health Officer : No objection – has commented that the proposed location for the DSM is in the middle of the quarry and that the particle size of the sand proposed to be used within the DSM are relatively large compared to respirable dust

Consultees (Statutory and Non-Statutory)

26. Government Office for the South East : No comments received
- Reigate and Banstead Borough Council (adjoining authority)
27. - Planning Department : No comments on the application
28. - Environmental Health Officer : No comments on the application.
29. Natural England : No objection recommending consultation with the Surrey Hills AONB office
30. Environment Agency : No objection subject to conditions
31. English Heritage : No objection
32. Sutton and East Surrey Water Plc : No comments on the application
33. Highways Agency : No comments received – to be reported at the Planning and Regulatory Committee
34. South East England Regional Assembly : No objection

(SEERA)

35. Surrey Wildlife Trust : No objection on ecological grounds
36. Health Protection Agency : No objection
37. Health and Safety Executive : No comments on the application
38. Thames Water : No comments on the application
39. County Noise Consultant : No objection subject to conditions
Planning Manager
40. - Environmental Assessment Team : The Environmental Statement received a rating of 'C' indicating that it can be considered to be of satisfactory quality, parts have been well attempted but there are many minor admissions but that the Environmental Statement satisfies the regulatory requirements
Countryside Manager
41. - Rights of Way : No comments on the application
42. - County Landscape Architect : No objection – considers there to be no greater impact on landscape or visual aspects
43. - County Ecologist : No comments received
44. - Area of Outstanding Natural Beauty Office : Comments provided through the County Landscape Architect
County Highways Authority
45. - Transportation Development Control : No objection subject to conditions

Parish/Town Council and Amenity Groups

46. Godstone Parish Council

Objection that the site lies within the AONB of which the proposal would be inappropriate in this area having an adverse impact on the protected landscape. The proposal would have a structure that would be highly visible from surrounding areas and that traffic movements would not be reduced being increased through the village of Godstone. That the proposal would lead to cumulative effects of discharges from the plant in addition to sand quarrying and the adjacent M25 leading to health impacts. That current dust monitoring is incorrectly sited so that the data is not an accurate indicator of the amount of dust. There is a risk of pollution to surface water and that discharged at Spynes Mere. That the proposal could lead to an extension of the life of the quarry and attract further industrialisation impacting on the long term amenity of local residents. That no examination of alternatives has taken place. That the proposal cannot be deemed to be 'ancillary' to the mining of sand at the quarry. That a decision is being taken in isolation from the still unresolved planning breaches by WBB Minerals.

47. Bletchingley Parish Council

Objection that the proposal is inappropriate and unacceptable within the Green Belt and there appears to be an assumption that North Park Farm Quarry should provide the required building sand. The site assessment is inadequate to determine why the DSM plant should be at North Park Farm Quarry. Concern raised that the proposal relies on irregularities in the building of the WBB Minerals processing plant and is dependent upon a retrospective planning application and an area on the quarry floor that remains unoccupied by a number of buildings that formed an essential part of WBB Minerals permitted plans but are not built. The proposal is pre-empting any proper consideration of WBB Minerals new planning application. The proposal would have detrimental impacts upon the Surrey Hills AONB.

That cumulative development could attract further industrial development at the site. The proposal would lead to pollution by dust and possible emissions leading to deterioration of the air quality. The proposal would result in an unacceptable increase in large vehicular movements and has no demonstrable benefit to the local economy or community with the risk to the wider local environment by contamination of local surface water. Concern that the vehicles associated with the proposal would be visible above the haul route screening as the HGVs currently are barely screened. Concern that air quality within the district is decreasing and that Appendix A3 does not provide information on the processes of the fluid bed drier or emissions from the exhaust stack.

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|-----|--|---|--|
| 48. | Nutfield Parish Council | : | No comments received |
| 49. | The Ramblers' Association | : | No comments received |
| 50. | East Surrey Badger Protection Society | : | No comments received |
| 51. | Surrey Amphibian and Reptile Group | : | No comments received |
| 52. | Bletchingley Conservation & Historical Society | : | Objection: the proposal would have visual effects on the Green Belt and Surrey Hills AONB; the environmental implications of the proposal particularly including restoration; and the inadequately monitored breaches of earlier planning permission which the new proposals will exacerbate |

Summary of publicity undertaken and key issues raised by public

53. The application was publicised initially by the posting of 5 site notices and an advert was placed in the local newspaper. A total of 290 owner/occupiers of neighbouring properties were directly notified by letter. Following the submission of further information under the requirement of Regulation 19 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999, the further information was publicised by the posting of 5 site notices, an advert being placed within the local newspaper; and a total of 384 neighbour notification letters were sent.
54. A total of 221 letters of representation have been received and a petition of 2500 signatories has also been received. Many issues and concerns were raised within representations received. Below is a list of those points raised, which are considered to raise matters that may be material planning considerations for the planning application:
- Increased pollution from the proposal including noise and air quality. The area is already blighted by pollution from the M25 and the proposal would exacerbate it
 - The existing quarry is violating conditions and there appears to be a lack of enforcement from the County Council in enforcing these
 - The site is located within the Green Belt and is wholly inappropriate to the area and the proposal will lead to increased industrialisation of the area

- The proposal should be located at an industrial site
- The proposal will lead to increased lorry movements going through Godstone causing increased traffic pollution and congestion particularly towards the junction with the M25
- The site is located within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGLV)
- The proposal Concern over the health and well being of nearby population
- Increased levels of dust from the deposition of cement and lime dust; and general levels of dust within the locality
- The proposed plant would be unsightly and is too tall being visible for miles around
- The planning application is premature because of the outstanding issues with WBB Minerals at North Park Farm Quarry and should not be determined until these issues have been resolved as this will be pre-judging the outcome of the WBB application
- The levels of dust and fumes emanating from the exhaust pipe and the drier
- The proposal will lead to the life of the quarry being extended and not being restored when it should be and being returned to Green Belt land. The site may become prone to being restored to something else and there is no guarantee it would be restored
- The proposal will lead to an increase in asthma and breathing difficulties within the locality
- There will be a loss of visual amenity
- The proposal will have no benefit to the community
- Godstone village lies within a conservation area
- Where is the guarantee that Tarmac will build what is being proposed and that appropriate monitoring will take place
- The proposal will have an adverse impact on wildlife
- There will be a cumulative impact of discharges and the potential for groundwater contamination should spillages occur
- There is no indication of water use at the site i.e. from dampening down of stockpiles nor where waste water would go
- The proposal will have a large carbon footprint and is environmentally unsustainable
- A Health Impact Assessment should be carried out with the findings assessed
- There is currently a breaking of speed limits by vehicles associated with the site and this would get worse
- The proposal would lead to uncontrollable development at the site
- The surrounding roads are not suitable for the vehicles proposed
- If planning permission is granted, conditions should be rigorously enforced
- Tarmac's proposal would be located on the clay press house, which forms part of WBB Mineral planning application. The clay press house ensures that discharges into surface water are of a particular standard therefore this would be questionable
- There will be a general negative effect
- There will be no provision to control the number or weight of lorries
- No feasibility study has been submitted
- The proposal will affect a wider area of land which will be excavated to feed the works
- There will be an increase in accidents and vibration from the proposed vehicles
- The proposal is not of national need and is not necessary as a part of the existing processing or operation of silica sand
- Increasing nuisance
- There is a lack of alternative assessment work
- County Councillors and Planning Officers have failed to interact with the community
- The proposal will jeopardise local businesses
- Heavy Goods Vehicle traffic coming from the A25 travelling west should not travel through Godstone
- Does the proposal outweigh the costs
- There are no conditions that would make the planning application acceptable
- The area is a Site of Special Scientific Interest for archaeology
- The impact on local traffic should be assessed

- The effect of transporting sand into the site if the supply within the quarry runs out is ineffective. What would the site do if construction sand runs out?
- The general sense of injustice and a lack of confidence
- This would not protect the environment
- Even though a haul route is in place, not all the vehicles use it
- That WBB Minerals and Tarmac have not held meetings for the proposals
- There are economic advantages of having the plant sited adjacent to where the sand is being quarried
- Any application for this site in the future should be rejected
- There will be increasing higher stockpile of material which will be left uncovered
- There would be increased traffic through Bletchingley
- The exhaust pipe on the roof would release plumes of steam into the atmosphere
- Data suggests that PM₁₀ and PM_{2.5} levels are already being exceeded and the application does not take into account extremities
- The additional lorries going into the site with cement and lime; and the drier will negate the reduction of outward bound lorry movements and it being sustainable
- There is too little emphasis of the views from the North Downs and other paths of the proposal
- There will be a lack of proper control in any future planning proposal
- The benefits of removing the silos from the area east of North Park Lane should not be considered as part of this planning application as they were benefits sited within WBB Minerals planning application with regards to relocating the processing facility at North Park Farm Quarry
- The proposal should be sited where there is a supply of building sand
- The wrong dust monitoring equipment is in place
- Appendix A3 (of the Air Quality section of the Environmental Statement) lacks detail with regards to the pollutants that could be produced from the combustion process and steam from drying the sand causing a plume

55. In addition to the comments raised above, other concerns were raised however these are not considered to be material planning considerations for the present application:

- The levels of dust that emanate from the silica sand operations which is creating a public health issue
- The proposal is for a cement works
- House prices within the locality will fall should the proposal be permitted
- WBB Minerals will not honour their planning permission
- The monitoring of silica sand dust is currently inadequate
- There will be a diesel fired drier and silos in Church Lane
- There have been breaches made by Tarmac
- There is ability for 'back door' consent for industry
- Tarmac application should not be made as it is retrospective
- The proposal is for a processing plant
- The proposal is for an incinerator
- Less people will move to the village of Bletchingley
- Tarmac is currently in the process of being brought out and the new owners may have other facilities and land which could be used

56. The views of Godstone Village Association, Godstone Preservation Society, Campaign to Protect Rural England and the Quarry Observation Group are as follows.

Godstone Village Association

57. Objects to the proposal as the site lies within an AONB and AGLV and will have an adverse impact on the landscape, as it will be highly visible from the surrounding area.

That the outstanding issues with regards to the built processing plant at North Park Farm should be resolved prior to any decision being taken on this planning application. The proposal is not ancillary to the mining of sand at North Park Farm Quarry and therefore does not fall within acceptable development within the Green Belt. Any reduction in traffic movements by having the plant located at a quarry would be offset by the vehicle movements coming into the site bringing limestone and other additives as well as fuel for the dryer. The cumulative effects of the discharges from the plant will have repercussions on the health of residents. There are no details of the sand drying plant and what emissions or pollutants will occur and there is no information within Appendix A 3 of the Environmental Statement as to these dangers. There is no information as to the effects of transporting sand onto the site should the supply at the quarry diminish. There will be increased industrialisation. The proposal would extend the life of the quarry.

Godstone Preservation Society

58. Objects as consider that it would have a severely detrimental effect on the quality of life of people living in Godstone and Bletchingley. The proposal will be visible from Godstone, Bletchingley and the Surrey Hills. The particulates from the diesel driers being emitted will seriously increase atmospheric pollution. The proposal will prolong restoration of the site.

Campaign to Protect Rural England

59. Object as it is inappropriate to deal with the Tarmac planning application in advance of considering the WBB Minerals retrospective planning application. The filters being used around the site for dust monitoring are inappropriate and the results are misleading given that they are directional flows rather than deposits. Appreciate cannot prevent Tarmac submitting their application however it should not be considered as this will prejudice the retrospective application. The site is located within the Green Belt therefore the proposal is inappropriate. The proposal cannot be considered ancillary to the extraction of sand. Should the construction sand die out there is no justification for locating the plant in this quarry. Any use of industrial sands in the production of mortars is unsustainable and should be unacceptable. Queries whether sand deposits in North West Surrey been investigated for appropriate sites. The removal of WBB Mineral plant should not be used as a benefit to be gained by Tarmac. Consider insufficient account has been taken of the adverse impact of the structure on the landscape character and visual intrusion but considers landscape and visual impact study is comprehensive. Consider the increase in traffic flows is not excessively high but will make existing traffic noise situation worse. Potential for pollution of ground and surface water including the aquifer. Leakages of contaminants such as diesel, alkaline solutions and cleaning agents would be washed into the lagoon and there are no facilities to remove silt and contaminants from the water before it is discharged. Potential for a cumulative effect on the existing dust problems at the site.

Quarry Observation Group

60. Objects to the proposal and considers that the application should not be decided upon until after the determination of the WBB Minerals retrospective planning application. Objects as the proposal is not ancillary to the quarrying process and does not provide benefits that would outweigh the harm. The DSM plant would dominate the landscape more than buildings currently at the site. The demonstrable harmful impacts to the landscape, amenity, health and welfare of the local community, water supply, traffic, noise, conservation of nationally important mineral reserves and the environment have not been shown to be controlled or mitigated. There is a need for very special circumstances to be demonstrated and that no other suitable site exists. There is no assessment of chemical pollutants or contaminants and their effect on air quality, public health and the environment. Appendix A3 shows out of date noise legislation limits. There are discrepancies at North Park Farm Quarry requiring explanation from WBB Minerals and until this application has been made no assessment of the cumulative impact can be

made. The Environmental Statement has understated the landscape sensitivity of the area with too little weight being given to the landscape value of the AONB or AGLV. Views from the conservation area have not been recognised. Present bund screening will not prevent the DSM plant being highly visible from the Surrey Hills AONB, North Park Lane or from Bletchingley. The DSM plant would utilise soft sand however North Park Farm Quarry is identified for silica sand therefore the proposal would compromise the winning of industrial grade sands of UK national need. There is no local benefit to be gained from the proposal. There is an inadequate assessment of the harm to the aquifer with the proposed DSM being located closer to the aquifer. The application does not demonstrate that dust or air quality baseline levels are acceptable and the quarry is reported to be causing nuisance or possible harm to local residents.

PLANNING CONSIDERATIONS

Main Issues

61. The County Council as Mineral Planning Authority has a duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine this application in accordance with the development plan unless material considerations indicate otherwise. It is also necessary to assess the application against relevant policies and guidance set at the European, National and Regional levels.
62. The current proposal involves the construction of a dry silo mortar plant and associated infrastructure at North Park Farm Quarry which lies within the Metropolitan Green Belt and an Area of Great Landscape Value (AGLV). The Surrey Hills AONB lies approximately 200m to the north of the application site. The application raises issues with regards to environmental impact and amenity in particular landscape impact and impact upon the Green Belt. Other issues include the need for the facility, traffic, noise and dust emissions.

GREEN BELT

National Guidance

Planning Policy Guidance Note 2 (PPG2) – ‘Green Belts’

Mineral Policy Statement 1 (MPS1) – Planning and Minerals

Regional Planning Guidance for the South East – RPG9

Policy E3 – Green Belts

Surrey Structure Plan 2004

Policy LO4 – The Countryside and Green Belt

Policy DN17 – Mineral Workings and Restoration

Tandridge District Local Plan 2001

Policy RE2 – Development in the Green Belt outside the settlements

63. The application site is located within the Metropolitan Green Belt where policies of restraint apply and there is a general presumption against inappropriate development. Government guidance on Green Belts is set out within Planning Policy Guidance Note 2 (PPG2) “Green Belts” where in Paragraph 1.4 is states that

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness”

64. Paragraph 3.11 recognises that minerals can only be worked where they are found and that their extraction is a temporary activity. PPG2 does state that mineral extraction need not be inappropriate development provided that high environmental standards are maintained and that the site is well restored. Paragraph 3.13 further endorses this stating that large scale development of land in the Green Belt including mineral extraction, should so far as possible, contribute to the achievement of the objectives for the use of land in

Green Belts. This planning proposal is located within an existing operational quarry; however, it does not involve measures for the extraction of mineral and largely comprises the secondary processing of sand for sale with cement, lime and additives to produce mortar.

65. There is a presumption against development other than for a small range of uses deemed to be compatible with the objectives of the Green Belt. Where a proposal does not fall within any of the categories of development, which can be considered appropriate in the Green Belt *“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”*. The proposal which would involve the secondary processing of residual sand does not fall within any of the objectives as set out within PPG2 and would therefore represent inappropriate development. Consequently Paragraph 3.2 of the PPG2 states that *“inappropriate development is, by definition, harmful to the Green Belt. It is for the applicant to show why permission should be granted”*.
66. Regional guidance within RPG9 Policy E3 (Green Belts) outlines that local planning authorities should encourage the appropriate use of land designated as Green Belt to ensure there is improvement to the landscape and environmental value. Policy LO4 (The Countryside and Green Belt) of Surrey Structure Plan 2004 states that the openness and intrinsic qualities of the countryside will be protected. The policy goes on to state that development will only be permitted for agriculture, forestry or where it relates to the essential needs of outdoor sport and recreation or for management of the countryside as a resource. The policy does recognise that some operational development associated with mineral working would be acceptable where need is justified and adverse impacts can be satisfactorily managed. The policy supporting text provides further information on this outlining that certain operations *“may be acceptable in the countryside where an applicant has demonstrated satisfactorily that alternative locations in urban areas are not practicable and any adverse impacts are adequately mitigated”*.
67. Surrey Structure Plan 2004 Policy DN17 (Mineral Workings and Restoration) states that mineral workings, which include mineral processing, will be allowed where the need for the mineral outweighs the adverse impact of the development. The policy goes on to say that in Areas of Outstanding Natural Beauty (AONB) mineral workings shall only be allowed where it is clearly shown that the need for the mineral is essential and of national interest and that there is no other suitable alternative site. Whilst the proposal site is not located within the Surrey Hills AONB, it is located approximately 200m to the north of the application area.
68. Tandridge District Local Plan 2001 Policy RE2 (Development in the Green Belt outside the settlements) states there will be a presumption against inappropriate development that would be harmful to the Green Belt and that such development may be justified where very special circumstances exist that outweigh the harm by reason of inappropriateness. The policy states that the construction of new buildings inside the Green Belt is inappropriate unless they are for forestry, agriculture or outdoor sport. Additionally the policy states that engineering and other operations and the making of a material change in the use of land are inappropriate development unless they maintain openness.

Need

69. Regional Planning Guidance for the South East (RPG9 – Waste and Minerals) recognises that to maintain a healthy regional economy to meet significant growth pressures within the South East, an adequate supply of minerals and mineral related products to support development programmes and projects are required. However, RPG9 does acknowledge that a balance need to be struck between regional requirements for minerals and manufactured products with the environmental impact arising from the extraction and associated processing and transportation.

70. The applicant has outlined within the planning application the reasons why the DSM plant should be considered with regards to need being that the proposal would assist in a reduction in the production of waste mortar material. This aspect would lead to the achievement of sustainable development.
71. The applicant has stated that the predominant current practice of utilising wet mixed mortar within the construction industry is unsustainable as the wet mortar delivered to sites for use have to be used that same day as the mortar gradually hardens throughout the day. Consequently by the following day the mortar has hardened such that it cannot be used and has to be scrapped and disposed of at a licensed landfill. The applicant has stated that of three wet mortar plants operated by the applicant, between 12-14,000 tonnes of waste is recorded as going to landfill per annum. Within the planning application the applicant has outlined the dry silo mortar process by which the same ingredients are used as when producing wet mortar; however the mixture remains dry and is pre-blended at a DSM plant. By keeping the mortar mixture dry, it can be transported to a construction site where as little or as much water can be added to the mixture so that waste mortar can be kept to a minimum. Officers accept these arguments are relevant to the need for the process and demonstrate the potential for a more sustainable use of mineral resources.

Very Special Circumstances

72. The Surrey Minerals Local Plan 1993 outlines that the Lower Greensand deposits provide both 'soft' sand for building and construction purposes but also higher quality sands (known as silica sands) which are utilised within industrial processes. Building or construction sand from Surrey is used for a wide range of purposes but notably for mortars in building and in asphalt being covered by British Standard Specification.
73. North Park Farm Quarry primarily extracts sand that is to be utilised within industrial processes, i.e. silica sand. Not all of the sand extracted at North Park Farm Quarry is of a quality enabling it to be used within industrial processes. Consequently following the processing of the sand, the quarry produces sand that is of a lower quality but can still be utilised within the construction industry. Currently this residual sand is sold and is being transported from the quarry to the construction industry. The applicant has stated within the planning application that currently of the sand extracted at the quarry some 23% does not meet the strict parameters for industrial grades.
74. The applicant has given reasons why the proposed DSM plant should be located at North Park Farm Quarry and subsequently submitted further information in support of this. The argument is in two parts dealing firstly with the need to be located within a quarry and secondly why the North Park Farm Quarry has been chosen.
75. The applicant has stated that there are benefits to be gained with regards to sustainable development by locating the DSM plant within an existing operational quarry, such as North Park Farm Quarry, as this would assist in achieving a more sustainable pattern of traffic movement. This would be achieved by the removal of doubling handling of the sand required within the mortar production process as the DSM plant would be located at the source of the sand therefore there would not be the need to transport in this resource. Additionally the applicant refers to the number of vehicle movements that would be reduced as a consequence of utilising dry mortar mix instead of wet mortar mix which is due to the size of load delivering wet mortar mix being at 14 tonnes (this includes water) but that the proposal would utilise vehicles with 25 tonne payloads. The applicant has stated that for an equivalent of up to 100,000 tonnes production, this would reduce vehicle movements for product delivery from 7,143 loads (14,286 movements) to 4,000 (loads) 8,000 movements. This would be a reduction of 45% in related vehicle movements.

76. The applicant states that locating the DSM outside of a quarry would necessitate additional and unnecessary vehicle movements between a quarry and a third party location where a DSM is located and would be contrary to sustainable development principles with regards to traffic movements and minerals transportation.
77. The applicant has stated that the volumes of mortar produced through this type of plant has increased significantly, with output in 2006 being some 1,434,000 tonnes, having risen from 661,000 tonnes from 2002. The applicant currently operates a DSM plant in Colchester which serves north and east of the M25 and is now seeking through this proposal to install a DSM to serve the south and southwest of the M25.
78. The applicant has provided details of work carried out to identify alternative sites to that of North Park Farm Quarry. Within this work the applicant has demonstrated that land was sought of a particular size to accommodate the DSM plant and cope with lorry numbers associated with the proposed yearly movement of 100,000 tonnes. From this the applicant has detailed the area of search identified for the proposed DSM plant given that it would supply south west/ west London and the south west/ west home counties and would not be covered by an existing operational DSM plant, i.e. the plant at Colchester. The applicant has demonstrated evidence of search for a reasonable period involving both smaller commercial agents and major commercial companies, which have confirmed that the size of site being sought is rarely available. The applicant also confirmed that they contacted both Network Rail and EWS where sites were provided however these were too small and well outside of the area of search.
79. The applicant has stated that following no positive responses from commercial agents, they instructed agents to find a suitable site where a comprehensive survey was carried out however again this has not yielded any suitable sites. Only three sites were identified initially and all were subject to overriding constraints. Consequently the applicant has stated that the siting of the proposed DSM plant within an existing quarry is the only viable solution in light of no other suitable alternative sites being available.
80. Within representations received comments were made as to why the proposed DSM plant could not be sited further west around the M25, for example north west Surrey. Whilst quarrying activities take place within north west Surrey the mineral extracted there is of a different quality to that extracted at North Park Farm Quarry, being that it is sharp sand and would therefore not meet the specifications required by the DSM plant for soft sand. Other building sand quarries within Surrey do not have the physical or productive capacity to house the proposal.

Conclusion

81. The applicant has demonstrated that a comprehensive site assessment was carried out to ascertain whether other alternative sites were available for the proposed DSM plant to be located. Having concluded there are no such sites the applicant has proposed to locate the DSM plant within an existing quarry which would provide benefits with regards to sustainable development as the raw material of construction sand would be available at the site, reducing the need to import sand into the site. The applicant has stated that the DSM plant would serve the south and southwest London market area of which North Park Farm quarry would provide direct access onto the M25 to facilitate this. Taking this into account Officers consider that very special circumstances have been provided with regards to a lack of alternative sites available for the proposal and that the benefits accrued from siting the proposed DSM plant at a site where construction sand is available as a residual mineral clearly outweigh any harm to the Green Belt.

Restoration of the Site

82. Planning permission ref: TA02/0183 and RE02/0268 placed a time limit with regards to the processing and transport of minerals from North Park Farm Quarry (Condition 3) such that these activities should cease by 2014 and that all plant and equipment; and the haul route be removed and the site to be restored to agricultural and woodland use. The planning application acknowledges that the proposal is limited in its duration and welcomes the imposition of a condition (should the Committee be minded to grant planning permission) requiring the cessation and complete removal of all plant, buildings and associated infrastructure on cessation of quarrying at North Park Farm Quarry. Concern has been raised within representations received with regards to the potential for the proposal to prolong activities at North Park Farm Quarry. Officers consider that the duration of the proposal can be limited through the imposition of a condition limiting the time at which the DSM plant would be in place and that this would not jeopardise the restoration of the quarry.

LANDSCAPE

National Guidance

Planning Policy Statement 7 (PPS7) – Sustainable Development in Rural Areas

Mineral Planning Statement 1 (MPS1) – Planning and Minerals

Regional Planning Guidance for the South East RPG9

Policy M1 – Managing the Demand for Minerals

Surrey Structure Plan 2004

Policy SE8 – Landscape

Surrey Minerals Local Plan 1993

Policy 1 – Environmental and Amenity Protection

Tandridge District Local Plan 2001

Policy RE15 – Landscape Character

Policy RE16 – Areas of Outstanding Natural Beauty

Policy RE17 – Areas of Great Landscape Value

83. Planning Policy Statement 7 (PPS7) sets Government guidance on the protection of rural areas including landscapes designated as nationally important. The guidance states that the quality and character of the wider countryside should be protected with particular regard to areas designated for landscape qualities and that restraint should be applied on potentially damaging development. Paragraph 21 states that nationally designated areas, which include Areas of Outstanding Natural Beauty (AONB), have the highest status of protection in relation to landscape and scenic beauty. Paragraph 22 outlines that because of the serious impact that major development may have on AONBs, such applications should be subject to the most rigorous examination and include an assessment of the need for the development and how any potential detrimental effect on the environment and landscape could be moderated. PPS7 also recognises local landscape designations such as Areas of Great Landscape Value. MPS1 accords with this approach stating due to the serious impact that major mineral development may have on AONB's, development and all restoration should be carried out to high environmental standards.
84. Regional Planning Guidance for the South East is provided within RPG9 which states that only in exceptional circumstances would processing of mineral be permitted within AONBs however the guidance recognises that there are exceptions to national policy in areas subject to such constraints. The proposal would not involve an activity that would be processing the key mineral, which is being extracted from the site (i.e. the industrial sand) but would be a secondary process of applying imported cement, lime and additives to the residual mineral (the construction sand) producing dry mortar.
85. Surrey Structure Plan 2004 Policy SE8 (Landscape) outlines that the quality of landscapes within AONBs and AGLVs should be conserved and enhanced and that where *development inconsistent with the primary aim of conserving the natural beauty of the landscape will be resisted*. The policy goes on further to say that development that is

proposed within AGLVs would be expected to maintain the existing character of the area particularly where a proposal is within a location which is visible from the AONB. Surrey Minerals Local Plan 1993 Policy 1 states that mineral working should only be permitted where the County Council are satisfied that adequate safeguards are in place with regards to visual impact and any effects on the landscape.

86. The proposal should also seek to retain the local distinctiveness of the County Landscape Character Areas. The application area is located within the Holmesdale – Greensand Valley Character Area which is identified within “The Future of Surrey’s Landscape and Woodlands” published by Surrey County Council in 1997. The area is characterised by small to medium sized fields enclosed by low hedges forming a well defined field pattern; parkland and remnant parkland features; and an undulating landscape. It is recognised, however, that the landscape has also been influenced by urban development including mineral workings, motorways and urban fringe problems that have contributed an erosion of landscape character. The landscape surrounding North Park Farm is influenced by the M25 to the north, the golf course to the south and some landscape neglect.
87. Tandridge District Local Plan 2001 Policy RE15 (Landscape Character) states that the conservation and enhancement of the landscape within the district will be promoted and enhanced. Policy RE16 (Areas of Outstanding Natural Beauty) states that development proposals within AONBs will be subject to the most rigorous protection and that large scale developments will be resisted unless they are proven to be in the national interest and incapable of being located outside the AONB. Policy RE17 (Areas of Great Landscape Value) outlines that proposed development within such area will not be permitted if it would be inconsistent with the intention of protecting the landscape character.
88. The proposal area lies within an Area of Great Landscape Value (AGLV) and to the south of the Surrey Hills AONB. The proposed DSM plant would be located within the existing operational quarry base within the existing plant site area adjacent to the site offices and lagoon. The base of the quarry is approximately 94m AOD with the height of the surrounding quarry edge being some 113m AOD. The Surrey Hills AONB lies to the north of the quarry and proposal area, rising up to 200m AOD. North Park Farm Quarry is visible from the Surrey Hills however the northern quarry edge is some 126m AOD with tree planting on top of this. The M25 lies between the quarry and the North Downs. To the south of the quarry the land also rises from the quarry edge towards the village of Bletchingley which lays approximately 120m to 130m AOD. Agricultural land and a golf course lay between the quarry and the village.
89. Views of the quarry can be obtained from around the quarry edge and from the North Downs. Consequently the proposed DSM plant would also be able to be viewed but this would be in the context of the surrounding quarry activities and processing plant. The existing WBB plant at the site is well screened from public view points from the Surrey Hills AONB by mature vegetation and it being constructed in a sympathetic colour. There would be views of the upper parts of the DSM building in the local area from the Surrey Hills to the north and the surrounding countryside. The choice of colour for new buildings can have a significant impact in the countryside. Section 5 Design Guidelines for New Development of ‘The Future of Surrey’s Landscape and Woodlands 1997’ advises that ‘light colours reduce the impact of buildings seen against the sky’ and ‘dark colours, particularly blues and greys, reduce the visual impact of buildings seen against trees in the distance’.
90. The applicant has outlined within the planning application that the proposed DSM plant would be finished with PVC coated steel cladding in a mute green colour or broken green grey or similar. As the proposed DSM would be greater in height than the existing WBB plant and would be set against a backdrop of the existing quarry face, Officers consider that the north facing side of the plant could be painted in a colour to facilitate it blending

into the quarry face background. It is recommended details of the materials and colours of the proposed DSM should be the subject of a planning condition.

91. An Environmental Statement has been submitted by the applicant alongside the planning application, which includes a thorough landscape and visual assessment. The County Landscape Architect acting on behalf of the AONB Officer has assessed the application and has provided comments with regards to the proposals impact on landscape designations, policy and surrounding landscape impact. The County Landscape Architect acknowledges that the proposal has a sizeable footprint but that it would be located in the base of an existing operational quarry. The County Landscape Architect is satisfied with the assessment work submitted within the Environmental Statement and that there is no conflict with the Structure Plan in relation to landscape and the protection of the AONB/AGLV. The County Landscape Architect has also stated that he considers that the proposal would not in real terms add any cumulative impact within the wider landscape of the Character Area due to the landscape already being dominated by the existing quarry, M25 corridor and development.

TRANSPORT AND TRAFFIC

National Guidance

Planning Policy Guidance Note 13 (PPG13) – ‘Transport’

Surrey Structure Plan 2004

Saved Policy DN2 – Movement Implications of Development

Surrey Minerals Local Plan 1993

Policy 1 – Environmental and Amenity Protection

Tandridge District Local Plan 2001

Saved Policy MO13 – Movement and New Development

92. Planning Policy Guidance 13 (PPG13) ‘Transport’ sets out Government guidance with regards to transport and the provision of a safe, efficient and integrated transport system seeking to reducing the environmental impacts of transportation. Paragraph 3 of the guidance states *“land use planning has a key role in delivering the Government’s integrated transport strategy. By shaping the pattern of development and influencing the location, scale [...] planning can help to reduce the need to travel, reduce the length of journeys”*.
93. Consideration of the implications of traffic generated from development proposals is covered within Policy DN2 (Movement Implications of Development) in the Surrey Structure Plan 2004 which states that development would only be permitted where it is or can be made compatible with the transport infrastructure in the area. The supporting policy text recognises that development related traffic could create a strain on the surrounding transport network in terms of safety, capacity and environmental considerations such as noise and air pollution. The text outlines that proposals should contain appropriate mitigation measures to assist in minimising adverse environmental impacts of road traffic.
94. Policy 1 of the Surrey Minerals Local Plan 1993 outlines that safeguards should be secured or in place for the protection of the environment and amenities of local residents; and in consideration of mineral development proposals consideration should be given to minimise the impact of working in particular traffic generations, its impact and suitability of the public highway. The policy supporting text specifically discusses the implications of minerals related traffic stating that in determining applications the County Planning Authority should be satisfied that the volume and characteristics of the traffic generated would not have an unduly adverse impact on the locality and the highway network.
95. Policy MO13 (Movement and New Development) of Tandridge District Local Plan 2001 outlines that where proposals would generate traffic that would interfere with the free flow

of traffic on the highways network or create hazards to traffic, planning permission should not be granted.

96. The application proposes to utilise the existing dedicated transport measures that have been implemented at North Park Quarry which were a requirement of planning permission ref: TA02/0183 and RE02/0268. These include the use of the dedicated haul route for heavy goods vehicles and the specific junction access to the roundabout north of Godstone village, which facilitates the ease of access of quarry vehicles onto the M25 at Junction 6. The installation of a haul route as part of planning permission ref: TA02/0183 and RE02/0268 were chosen so to remove heavy goods vehicles traffic from the local transport network (i.e. vehicles travelling through Godstone village and along the A25). This haul route is currently in place and is being utilised by WBB Minerals and the unauthorised plant. Currently vehicle movements associated with North Park Farm Quarry are generated from vehicles exporting silica sand to the market and the subsequent returning vehicles; and secondly vehicles associated with the dispatch of construction sand (the by product of processing higher quality industrial sand) also to the market. Some other traffic results from the export of specialist sports pitch materials derived from the silica sand.
97. Currently both industrial and construction sand leaving North Park Farm Quarry does so in 20-25 tonne vehicles although some sand grades are dispatched in smaller loads. The applicant has provided current average vehicle movements (i.e. one inbound movement and one outbound movement) for the site, which can be seen in the table below for the export of all processed sand. Actual number of vehicles visiting the site can be obtained by halving the number of vehicle movements to the site:

| Time Period Total | Monday – Friday 0600 – 1800 hours | Monday – Friday 1800 – 0600 hours | Saturday – Sunday 0600 – 1800 hours | Saturday – Sunday 1800 – 0600 hours |
|--|--|--|--|--|
| Outbound & inbound movements per annum | 28760 | 13000 | 3120 | 3120 |
| Outbound & inbound movements per week | 553 | 250 | 60 | 60 |
| Outbound & inbound movements per day | 111** | 50 | 30 | 30 |
| Outbound & inbound movements per hour | 10** | 4** | 3** | 3** |

** = Rounded up to the nearest complete vehicle movement

98. The table above is based on a projected output tonnes per annum of 600,000 of processed sand. It is anticipated that the proposed DSM plant would produce 100,000 tonnes per annum of mortar, which would utilise 80,000 tonnes per annum of construction sand already based at the quarry, which is residual material following processing. This sand would therefore not require importation into the site and is included in the tonnage output and vehicle movements outlined within the table above.
99. Additionally the DSM plant would require 20,000 tonnes per annum of cement and lime to be imported to the site which in addition to generating inward bound vehicle movements would also generate outward bound vehicle movements as the cement tankers leave empty. The applicant has stated that all but a very small proportion, of vehicle movements would be in 25 tonne payload tankers. The applicant has stated that the importation of cement and additives (and resultant departure of empty vehicles) would generate 12 additional vehicle movements per day which would be less than one load every 2 hours in a working day. Furthermore the applicant proposes that transport despatch should only

take place between the hours of 0600 – 1800 Monday to Friday; and 0600 – 1200 Saturday which are of lesser hours than those currently used by WBB Minerals.

100. The County Highways Authority have assessed the proposal and have not raised an objection to the proposal. The County Highways Authority however recommend that a condition should be imposed limiting the means of access to the site to be from the B2235 Godstone Hill only except for when vehicles are delivering to the local area.

ENVIRONMENT AND AMENITY

National Guidance

Planning Policy Guidance Note 24 (PPG24) – Noise

Mineral Planning Statement 1(MPS1) – Planning and Minerals

Mineral Planning Statement 2 (MPS2) – Controlling and Mitigating the Environmental Effects of Minerals Extraction in England

Regional Planning Guidance for the South East – RPG9

Policy E7 – Air and water quality

Surrey Structure Plan 2004

Policy SE1 – Natural Resources and Pollution Control

Policy SE3 – Flooding and Land Drainage

Policy SE6 – Biodiversity

Policy SE7 – Nature Conservation

Policy DN17 – Mineral Workings and Restoration

Surrey Minerals Local Plan 1993

Policy 1 – Environmental and Amenity Protection

Tandridge District Local Plan 2001

Policy EV4 – Drainage and Sewerage of Foul and Surface Water

Policy EV5 – Water Supply

Policy EV6 – Water Quality

Policy EV10 – Noise

101. MPS1 and MPS2 provide government guidance with regard to planning and minerals development and the protection and enhancement of the environment from mineral working. MPS1 sets out a series of objectives with regards to environmental protection with regards to minerals development including protection of the countryside and the need to ensure that any unavoidable noise, dust and particle emissions are in conformity with national guidance and are controlled. MPS2 stipulates that where an Environmental Impact Assessment is provided for minerals development which is for an extension or modification to an existing site, it should concentrate on the effects of the proposed modification and whether that aspect could lead to a level of environmental impact that would be unacceptable for the site as a whole. RPG9 recognises that the workings and transportation of mineral development can have health and other social impacts such as noise and dust; and that minerals development should be consistent with achieving environmental protection and enhancement.

Air Quality and Dust

102. Annex 1 “Dust” of Minerals Planning Statement 2 (MPS2) states that dust from surface mineral operations is a material planning consideration when determining planning applications. The guidance states that although residents can potentially be affected by dust up to 1km away from the source, *concerns about dust are most likely to be experienced near to dust sources generally within 100m*. The key focus of the guidance is that dust should be controlled at the source with appropriate measures in place for the control and/ or mitigation of dust emissions.
103. Policy E7 (Air and water quality) of RPG9 seeks to ensure pollution control and that in the consideration of development proposals that air quality is taken into account where

appropriate along with other material considerations. The emerging South East Plan draft Policy NRM7 (Air Quality) states that an improvement in air quality should be sought by relevant authorities including local authorities. Policy 1 of Surrey Minerals Local Plan 1993 outlines a set of criteria that the County Council should be satisfied of before permitting applications including implications for health and safety of the public and impact on amenity including the effects of fumes and dust. Surrey Structure Plan 2004 Policy SE1 (Natural Resources and Pollution Control) outlines that development proposals should comply with prevailing standards for the control of emissions to air. The supporting text states that where a proposed development has any potential pollution risk associated with emissions or discharges, the risk must be reduced to comply with national or European standards of control, whichever the stringent.

104. The definition and impact of dust can be separated into two categories: public perception and amenity where particle sizes are greater than 10 micro millimetres (μm) in size; and air quality and health effects which relate to particles less than 10 micro millimetres in size (i.e. PM_{10}).

Air Quality

105. Standards and objectives for nine air pollutants of most concern, including PM_{10} , have been set out within the Government Air Quality Strategy for England, Scotland, Wales and Northern Ireland July 2007. With regards to PM_{10} , the Government set objectives that the 24 hour mean of $50\mu\text{g}/\text{m}^3$ should not be exceeded more than 35 times a year. Should the standards and objectives for the nine pollutant levels exceed their relevant thresholds, the Local Authority responsible for air quality (in this case Tandridge District Council) should designate the area as an Air Quality Management Area (AQMA) for the particular pollutant. Tandridge District Council Environmental Health Officer (EHO) has assessed the application and has commented with regards to air quality stating that currently the air quality within the locality is such that it is not considered necessary to declare an AQMA for the area.
106. Concern has been raised within representations as to the monitoring of PM_{10} levels as part of air quality within Tandridge district as currently no monitoring takes place by the Highways Agency along the particular stretch of the M25 which runs through Tandridge. The EHO has stated that currently there is no requirement set by the Government for local authorities to monitor PM_{10} levels but that Tandridge District Council currently monitor both nitrogen dioxide and benzene. Tandridge District Council EHO has raised no objection to the proposal on air quality grounds.

Public Health

107. MPS2 states that with regards to mineral activities that research has indicated that *1000m should be an adequate cut off point for considering whether additional measures to control PM_{10} should apply.* Additionally in taking this into consideration, Mineral Planning Authorities should also take into consideration the nature of the landscape, the location of the site and the nearest residential property or other sensitive use in relation to prevailing wind direction. North Park Farm Quarry is set within a rural area however residential properties are located approximately 890m to the west of the proposed site (Place Farm Cottages); 660m to the south east of the proposed site (North Park Cottages); and 685m north east of the proposed site (Orchard Cottage). The Orpheus Centre is located approximately 830m north east of the proposed site on North Park Lane.
108. The applicant has provided an air quality assessment within the Environmental Statement submitted supporting the planning application. Within this assessment the applicant has outlined potential dust sources that may arise from the proposal these being the front end loader when moving sand to the hoppers and the conveyor feed; and the other being vehicle movements. Of these sources, the applicant has stated that the feed hopper

currently operates at the quarry therefore this would not be introducing any new activity to the site; and that the conveyor would be enclosed. Additionally the road surfaces which lorry tankers would be utilising to access the DSM plant and leave the site would be surfaced and the lorry tankers would be enclosed.

109. The applicant has described within the Environmental Statement that the construction grade sand that would be supplied to the DSM plant would comprise of particle sizes in the range between 200 – 600µm. Dust particle sizes are normally between 1-75µm, with particles larger than 30µm in size falling out of the atmosphere under gravity and settling within 100m of the source. Therefore it is not anticipated that the proposal would give rise to PM₁₀ particles.
110. The sand to supply the DSM would be supplied from stockpiles holding washed sand that would have an inherent moisture content however to avoid the sand drying out the applicant has stated that the stockpiles would be equipped with a water spray system. Once the sand has been transported into the DSM plant the sand would be moved by bucket conveyors and not by an air transport system and all processes would remain inside the building. The only material that would be blown into the silo system would be the cement delivered to the site, which would be blown using on board pumps having an automated shut down procedure.
111. PM₁₀ levels are also created due to exhaust emission from road transport. North Park Farm Quarry is located in close proximity to the M25 motorway of which it is understood that no PM₁₀ monitoring currently takes place along this part of the M25 through Tandridge district. The Air Quality Strategy for England identifies that exceedences of PM₁₀ objectives are mainly due to road transport emissions and that only a few have been caused from burning solid fuel. There is no mention within the strategy of mineral activity.
112. Concerns have been raised within representations received with regards to dust emissions and health implications from the dust. Dust is currently monitoring at North Park Farm Quarry by WBB Minerals using British Standard directional dust gauges which are located at North Park Cottages to the east of the quarry; and Place Farm to the west. Dust collected on the gauges is collected in each direction and weighed. From the data collected between December 2002 until July 2006, averages were taken of 247 mg/m²/day at North Park Cottages and 207mg/m²/day at Place Farm. The applicant has outlined within the Environmental Statement two other rural areas in close proximity to active sand quarries where average daily dust levels were measured at 187 and 173 mg/m²/day. The applicant has also outlined within the planning application that there are no dust standards from which comparisons can be drawn but that others have adopted the 'Frisbee' gauge where a suggested nuisance limit of 200mg/m²/day is used but this type of gauge provides no information on direction of the source.
113. Tandridge District Council EHO has commented on the application with regards to dust and potential health impacts. The EHO has stated that due to the size of the particles of sand that would be used within the proposed DSM process; these particles would be likely to fall out of the air close to the source and therefore would be of a low risk to the health of residents within Bletchingley and Godstone. The EHO acknowledges that whilst in extreme weather conditions sand will travel further than normal, the Environmental Health department is not aware of a significant problem from nuisance dust in the above villages and that currently the air quality objectives of PM₁₀ are being met and the proposed DSM plant would not be expected to alter this.
114. The Health Protection Agency (HPA) have provided comments on the planning application and have stated that as the particle size of the sand utilised as part of the proposal would be greater than 70µm in size it is not considered likely to cause direct harm to human health as particulate matter of such size is not considered respirable. The HPA have stated that to ensure dust levels are kept to a minimum that dust levels should be continued to be

monitored, that dampening down of road surfaces and stockpiles should be undertaken to prevent dusts being generated; that guidelines should be in place for spills and clean ups and that COSHH guidelines should be in place for all mixes on site with appropriate training for staff.

115. Given the particle size of the sand to be utilised within the plant and the proposed mitigation measures; and having regard to the views from both Tandridge District Council EHO and the HPA; Officers consider the DSM process should not give rise to adverse health or amenity impacts.

Noise

116. MPS2 outlines a list of criteria, which should be taken into account when considering proposals for mineral development including the impact of noise from both plant and machinery; and transport. Paragraph 12 states that when considering development proposals the level of existing activity and impact should be taken into account in addition to the extent and level of tolerance of noise impact created on the locality, community, environment or wider area of mineral working having regard to the cumulative impact of the proposal. MPS2 does advocate, however, that in considering planning applications for mineral development the benefits of providing an adequate supply of minerals to the economy and hence society should also be considered in addition to methods of control.
117. Annex 2 “Noise” of MPS2 seeks to complement government guidance outlined within Planning Policy Guidance Note 24 “Planning and Noise” which relates to types of development and land use that are susceptible to exposure from noise with general principles also being applicable to mineral working. Government guidance within MPS2 with regards to noise is to *keep noise emissions to a level that reflects the highest environmental standards*. In doing so, minerals development proposals should have regard for the “Guidelines for Community Noise” (1999) where the World Health Organisation advises that *to protect the majority of people from being seriously annoyed during the daytime, the outdoor sound level from steady continuous noise should not exceed 55dB L_{AEQ} on balconies, terraces and outdoor living areas. To protect the majority of people from being moderately annoyed during daytime, the outdoor sound level should not exceed 50dB L_{AEQ}*. MPS2 recognises that the layout and plant location, the sequencing of operations and the hours of working can have significant effect on the level of noise emissions and impact; which can be addressed through screening or enclosure of plant. MPS2 notes that control of noise emissions from the source can be obtained through the imposition of planning conditions where appropriate in accordance with Circular 11/95 (The Use of Conditions in Planning Permission).
118. PPG24 provides further advice particularly with regards to industrial and commercial development of which minerals development would be similar to. PPG24 states that in such cases BS4142 (Method for rating industrial noise affecting mixed residential and industrial areas) would be the most appropriate guidance and where a difference in noise levels are recorded of around 10 dB or higher, complaints are likely, whereas a difference of around 5 dB is of marginal significance.
119. The Surrey Minerals Local Plan 1993 states that proposals will be considered on their own merits in light of policy and guidance; and to ensure that proposals accord, the County Planning Authority should be reassured that steps have been taken to minimise the impact of mineral development with regards to potential effects of noise. Policy SE1 (Natural Resources and Pollution Control) of Surrey Structure Plan 2004 states that development must comply with prevailing standards for the control of emissions to air and that development should not be permitted where, by reason of noise, it would be harmful to the environment. Tandridge District Local Plan 2001 Policy EV10 (Noise) states that permission for development should not be granted which would generate an unacceptable level of noise and which would affect noise sensitive development.

120. Mineral operations and the individual components of minerals development are known to create high levels of noise. Consequently Surrey County Council has produced its own noise guidelines, "Guidelines for Noise Control: Minerals and Waste Disposal", 1994, by which mineral development should comply with. The guidelines state that mineral working can involve a range of activities at any one site, including the removal and storage of soil and overburden, processing and exporting of the mineral. The proposal involves the plant being housed within a building to process sand with other elements producing mortar for sale within a currently operational quarry. Consequently the proposal does not include any element of site preparation in terms of soil or overburden stripping nor is the proposal directly related to the restoration of the site. The guidelines advise that static equipment should be located and arranged such that it creates the minimum environmental noise impact outlining that where noise is emitted which lacks any particular character its limits should be restricted to 5dB(A) above the background noise level during a normal working day.
121. Noise is measured on a logarithmic scale therefore to have a significant increase in noise levels that are audible and likely to generate complaints; the increase in noise measurements has to be substantively higher. For example an increase in 3 dB(A) for a noticeable difference.
122. Internal operations of the proposed plant include a sand dryer, mortar mixer and storage silos. External elements include hoppers, an enclosed conveyor and the use of a front-end shoveller alongside vehicles accessing the site. The applicant has submitted information with regards to noise within the Environmental Statement. The noise calculations have been produced by calculating noise at properties which have previously been identified for planning applications submitted for North Park Farm Quarry and baseline noise levels obtained from an operational DSM plant located near Coventry. Acceptable noise limits have already been set for the residential properties identified. The noise information submitted shows that currently noise levels for quarry activities, the processing plant and use of the access road generates daytime noise levels of 50LAeq and night time noise levels of 36LAeq. The applicant has also submitted data with regards to noise levels experienced at noise sensitive buildings near to the site which have been assumed as 45 dB LA90 during the daytime and 41 dB LA90 at night.
123. The existing highway network including the M25 to the north of the site and the A25 to the south impacts upon background noise levels within the locality of North Park Farm. The applicant has stated that based on the worst case scenario, that the addition of the DSM plant could increase noise levels at noise sensitive properties by up to 3 dB(A). PPG24 states that 3 dB(A) is the minimum change in noise level discernible by the human ear however as the noise assessment for the proposal is based upon a worst case, it is unlikely that the proposal would create a noticeable change in noise levels from the quarry. Furthermore the noise assessment submitted demonstrates that no noise levels from the proposal are predicted to exceed 44 dB LAeq which falls below the prevailing background daytime noise level of 45 dB LA90.
124. With regards to traffic noise the noise assessment submitted demonstrates that such levels would be around 42.6 dB LAeq (30 minutes), which is within the limit set by the County Council of 55 dB LAeq (30 minutes). The applicant has stated that the operating times of the proposal would not exceed those currently in use by WBB Minerals for both quarrying activities and lorry movements.
125. The County Noise Consultant (CNC) has assessed the application and has stated that he notes the site is well screened and that there is already similar plant working on the site. He has stated that the proposed noise figures provided are similar in level to the existing plant and therefore raises no objection to the proposed DSM plant itself. The CNC has made similar comments with regards to traffic noise, which could be generated from the

proposal in that he considers the proposed increase in vehicles would not make a significant increase in noise levels. He considers that a condition should be imposed limiting noise generated from the proposal, which is the same as that imposed on the planning permission granted in 2004. The CNC has also stated that a condition should be imposed on any planning permission granted limiting the noise generated from reversing beepers.

126. Some concern has been raised with regards to potential noise generated from when the lime and cement are blown into the DSM plant, which is proposed to be from 6am. The CNC has stated that he considers this proposed aspect would fall within the limits of the Surrey Noise Guidelines of 55 LAeq and that due to the M25 already becoming busy at this time in the morning, that this aspect would not generate any significant noise issues. He recommends a condition should be imposed to restrict noise levels of this particular aspect of the proposal to limit noise levels to 45LAeq between 0600 and 0730; and 55LAeq after that time. The Environmental Health Officer for Tandridge District Council has raised no concern with regards to noise.

Hydrology and Water Quality

127. Policy 1 of the Surrey Minerals Local Plan 1993 seeks to protect the flow and quality of groundwater, surface water, land drainage and flooding which may be affected from potential minerals development. The policy advocates that development proposals should demonstrate that steps have been taken to safeguard protection of such aspects of the environment. Surrey Structure Plan 2004 Policy SE3 (Flooding and Land Drainage) also provides guidance with regards to hydrology aspects. It advocates that new development should not lead to an increase in run off which would exacerbate flood risk elsewhere.
128. Tandridge District Local Plan Policy EV4 (Drainage and Sewerage of Foul and Surface Water) advises that following consultation with the Environment Agency, a provision for the storage on site to control the rate of discharge of surface water may be required. Policy EV5 (Water Supply) states that development will only be permitted when it is considered that adequate water resources are available such that their provision is not detrimental to existing abstractions, river flows and water quality. Policy EV6 (Water Quality) of Tandridge District Local Plan seeks to protect the water quality of both ground and surface waters stating that development will be resisted that would adversely affect the quality these aspects of the environment. Whilst not part of the development plan, policies within the emerging South East Plan are material considerations when considering planning applications. Draft Policy NRM1 (Sustainable Water Resources, Groundwater and River Water Quality Management) states that these aspects of the water environment should be maintained and enhanced by avoiding adverse effects of development on the water environment.

Groundwater

129. Both the quarry and the proposal site lies within the outcrop of the Folkstone Beds, which are classified as a major aquifer within the Lower Greensand formation. Local water is abstracted for supply from three complexes by Sutton and East Surrey Water Company. The applicant has stated that the proposed DSM plant would be located some 7 metres above the maximum recorded water table level which would be at the same level as the existing processing plant (and that which was approved). The applicant has set out within the Environmental Statement the measures that would be in place to prevent pollution from the proposal to the groundwater aquifer from spillages or risks of contamination including the imposition of hard surfaces, interceptors, containment of liquids including tanks and bunds and measures in accordance with the Environment Agency Pollution Prevention Guidance Notes.

Surface Water

130. North Park Farm Quarry currently obtains water from the former Mercers East Quarry via a pipeline after which all used water then drains into a settling lagoon within the quarry before being discharged into Redhill Brook under the terms of the discharge licence granted by the Environment Agency.
131. The applicant has stated that drainage of the DSM plant area would be kept separate from drainage of the rest of the quarry area so that potentially contaminating water can be isolated. The Environmental Statement states that any water collected from the proposal area would be directed to an oil separator/ silt chamber before it is discharged to the quarry's freshwater lagoon where the water would either be used as part of the process plant circuit or would be discharged from the site. The DSM plant and any surface water generated from the proposal would be subject to pollution prevention measures as set out within the Environment Agency's guidance notes.

Flood Risk

132. North Park Farm Quarry lies to the north west of an area liable to flood and is not within a floodplain itself. The applicant has assessed peak flows generated from the DSM plant, sand processing plant and quarry areas using the Flood Estimation Handbook for the 1 in 50 year and 1 in 100 year three-hour storm event. The applicant has stated that any peak discharges at the site would be contained within the quarry with any average discharges being removed from the site to the lagoon or to the stream to the south of the quarry.
133. Sutton and East Surrey Water Company have confirmed they have no comments to make on the planning application and the Environment Agency have stated they have no objection to the planning application on hydrology, hydrogeology or flood risk grounds. The Environment Agency have requested the imposition of conditions with regards to surface water drainage should any planning permission be granted.

Ecology

134. Biodiversity and nature conservation are protected by Surrey Structure Plan 2004 Policies SE6 and SE7 which state that development which may harm designated site that are important for nature conservation or features within the landscape that are of importance should be only be permitted if mitigating measures can be put in place to prevent damaging impacts and that development should seek to retain such features. Policy 1 of the Surrey Minerals Plan 1993 states that mineral development proposals should assess any potential impact on nature conservation that result from the proposal.
135. The proposal site is not covered by any ecological designations with the nearest ecological designation being Kitchen Copse Site of Nature Conservation Importance approximately 730m northwest of the application site. The proposal involves an enclosed process within the DSM plant with the processes contained within the building itself following sand being fed into hoppers. Natural England and Surrey Wildlife Trust have been consulted and have assessed the planning application and have raised no concerns with regards to the proposal on ecological grounds and that there would be no significant threat posed to local habitat or protected species.

Pollution Prevention

136. Government advice on planning and pollution control is set out within Planning Policy Statement 23 (PPS23) "Planning and Pollution Control" (2004). The Statement advises in paragraph 2 and restates in paragraph 8 that *"any consideration of the quality of land, air or water and potential impacts arising from development, possibly leading to impacts on health, is capable of being a material planning consideration, in as far as it arises or may arise from or may affect any land use"*. The Statement also goes on to state that the

controls under the planning and pollution control regimes should complement each other rather than seeking to duplicate advising that the planning system should “focus on whether the development itself is an acceptable use of the land and the impacts of those uses”.

137. The proposed DSM plant includes a process for drying of the sand that is fed into the plant from the stockpiles. The sand requires drying as on entering the DSM plant it would be damp and have an inherent moisture content; and is required to have a moisture content of less than 0.5%. The sand drying plant would have a vertical exhaust stack which would be regulated under the Local Authority air pollution prevention control (LAPPC) procedures for Part B Processes under the Environment Act 1995 which would provide the relevant controls with regards to emissions to the atmosphere. Appendix A3 of the Air Quality Section of the Environmental Statement outlines the key procedures that would be required under the key control procedures including noise, dust, visual monitoring of the colour of the emission (on a daily basis); and monitoring of particulate matter.
138. Whilst Tandridge District Council is the appropriate authority to be concerned with pollution prevention, this Authority must consider potential impacts in terms of landuse. PPS23 advises that the planning system controls the location of development which may give rise to pollution and should focus on whether the development itself is an acceptable use of land and the impact of those uses, rather than the control of processes or emissions themselves. Appendix A of PPS23 lists matters, which may be material in the consideration of individual planning applications where pollution considerations arise. Three matters are relevant to this application, which are:
- *‘The possible impact of potentially polluting developments (both direct and indirect) on land use, including effects on health, the natural environment or general amenity’;*
 - *‘The potential sensitivity of the area to adverse effects from pollution, in particular reflected in ... the quality of soil, air, and ground and surface waters ... Water supply (Source Protection Zones)...’;*
 - *‘The possible adverse impacts on water quality and the impact of any possible discharge of effluent or leachates which may pose a threat to surface or underground water resources directly or indirectly through surrounding soils’*
139. The applicant has set out the regime that would be followed to ensure the emissions from the stack would comply with the LAPPC regime. Tandridge District Council EHO has also reviewed Appendix A3 and has stated he is satisfied with its content and that the district council would set the requirements of the permit. Concern has been raised within representations received as to potential impact from the sand drying mechanism and the exhaust stack with regards to pollution. The EHO has confirmed that the information submitted by the applicant with regards to the drying of the sand provides sufficient detail. The EHO has also stated that the LAPPC permit would also monitor dust from the exhaust stack and the permit would require the installation of automatic dust monitors to ensure the emissions do not exceed set levels.
140. Concern has also been raised with regards to the generation of steam following the drying of sand. The EHO has commented on this point stating that the heating of damp sand would produce steam however steam is not normally visible until the temperature falls below 100°C when it then condenses to form water vapour. The EHO has stated that the quantity of water vapour would depend on the efficiency of the system prior to the exhaust such that the more efficient the system, the more heat recovered the quicker the steam would condense and then become visible. Additionally the temperature outside of the DSM plant would be a factor. The EHO has stated that the LAPPC permit would not place any controls on the generation of steam.

141. Officers are satisfied that, alongside the complementary regime of LAPPC, the proposal is acceptable for the site and its location and therefore complies with the requirements of the Development Plan.

RELATIONSHIP WITH CURRENT QUARRYING ACTIVITIES

142. An extant planning permission currently exists at North Park Farm Quarry for the extraction of silica (industrial) sand, the processing of this sand and the construction of a haul route from the quarry to Junction 6 with the M25. Whilst a processing plant has been constructed at the quarry site this has not been in accordance with the planning permission granted therefore planning permission ref: TA02/01832 and RE02/0268 has not been implemented. The extant planning permission may be implemented until July 2009.
143. The DSM plant planning application should be considered on its own merits. It would nevertheless, be wrong for the Committee to take a decision, which anticipated or required a decision in the future on a separate planning application. Therefore the committee should not grant planning permission for the DSM if served by the unauthorised processing plant. However, there remains the option of the DSM plant being constructed and operated in connection with the extant planning permission (ref: TA02/0183 and RE02/0268). Case law shows that a planning permission can be granted regardless of the prospect for implementation. Officers consider that the proposed DSM plant could be constructed at the proposed location within North Park Farm and not otherwise sterilise or conflict with planning permission TA02/0183 and RE02/0268. Officers therefore consider that planning permission could be granted for the current application notwithstanding the fact that the current plant does not have a planning permission provided that the development does not rely on the unauthorised plant. Any planning permission granted would have to be subject to a planning condition, which tied the operation of the DSM, plant to the use of material produced by the permitted plant and from no other source including imported mineral.

HUMAN RIGHTS IMPLICATIONS

144. 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.
145. In this case, Officer's view is that while potential impacts on amenity in relation to visual impact caused by the DSM plant are acknowledged, the level of such impact should not be significantly different to the existing quarrying activities and are not considered sufficient to engage Article 8 or Article 1 of Protocol 1. Their impact can be mitigated by conditions. As such, this proposal is not considered to interfere with any convention rights.

CONCLUSION

146. The proposed development is for the construction of a DSM plant and ancillary structures. The proposal includes an enclosed operation and the use of residual sand which cannot be used in high grade industrial processes. The proposal would utilise an existing haul route and would be located at the base of an existing operational quarry. Whilst the proposed DSM plant would be some 34m in height which would be greater in height than the WBB Minerals processing plant, its position within the base of the quarry will assist in reducing its visual impact as will the existing tree cover around the quarry. As construction sand is currently transported out from the site additional traffic movements associated with the proposal would only be generated from the importation of cement, lime and additives and the subsequent departure of those empty vehicles. Furthermore as the proposed DSM plant is an enclosed structure and would utilise sand which is of a large particle size it is

not anticipated that the proposal would cause adverse air quality or health impacts from dust.

148. Officers consider that there is a need for the plant and on the basis of evidence submitted that there is no suitable alternative location for the plant. Accordingly, Officers consider that very special circumstances are proven which clearly outweigh the harm to Green Belt. The plant would otherwise allow a more sustainable use of mineral resources and offer the potential for reduction in vehicle miles travelled by locating adjacent to the main source material. The proposal is for a temporary use that will be removed when quarrying is complete. Whilst the plant is of a substantial scale Officers consider the proposed location within the quarry offers sufficient protection to the visual amenity of the wider landscape such that landscape policy and amenity objectives are satisfied.

RECOMMENDATION

The recommendation is to PERMIT TA07/0710 subject to conditions

Conditions

Approved Documents

1. The development hereby permitted shall be carried out and completed in all respects strictly in accordance with the terms of this permission, the submitted documents and plans contained in the application and the amending/ amplifying Design and Access Statement dated June 2007; letter dated 21 June 2007 and accompanying plans R92/04 and R92/05 received 25 June 2007; letter dated 25 September 2007, letter dated 2 October 2007 and accompanying "Air Quality Emission Monitoring Statement and Description of Key Control Procedures" and Environmental Policies; and letter dated 8 November 2007; and no variations or omissions shall take place without the prior approve in writing of the County Planning Authority.

Commencement

2. The development hereby permitted shall be begun no later than 18 July 2009. The applicant shall notify the County Planning Authority in writing within seven working days of the commencement of the implementation of the planning permission.

Time Limits

3. The processing and transport of minerals associated with the dry silo mortar plant shall cease by 31 December 2014 whereafter the plant and associated haul route shall be removed and the site shall be restored to a condition suitable for agriculture and woodland use with all works completed by 30 September 2016 in accordance with Condition 26 of planning permission ref: TA02/0813 and RE02/0268 dated 19 July 2004 or any further details or any subsequent amendments approved in writing by the County Planning Authority

Hours of Working

4. No light shall be illuminated nor shall any operations or activities authorised or required by this permission be carried out except between the following times:

0600 – 1900 Hours Monday to Friday
0700 – 1200 Hours Saturday

There shall be no working on Sundays, Bank Holidays or National Holidays other than for emergency maintenance work.

This condition shall not prevent the following activities:

- operation of external lighting for security purposes;
- the transport despatch of heavy goods vehicles between 0600 – 1800 Monday to Friday; and 0600 – 1200 Saturday

Limitations

5. The development hereby permitted shall produce up to a maximum of 100,000 tonnes of dried mortar per year. The operator shall maintain a record of the production tonnage on a monthly basis and shall make the information available to the County Planning Authority on request.
6. The development hereby permitted shall only utilise indigenous residual sand that is a by-product following the processing of silica sand by a processing plant as constructed and operated strictly in accordance with Planning Permission ref: TA02/0183 and RE02/0268 dated 19 July 2004. No other sand shall be utilised in the production process without the prior approval of the County Planning Authority.
7. No visible plume shall be emitted from the emission stack located on the dry silo mortar plant.

Details of Building and Lighting

8. The development hereby permitted shall not commence until details of the colours and all materials to be used externally on all of the buildings to be constructed on the site have been submitted to, and approved in writing, by the County Planning Authority. Materials specified for the facing of surfaces of the dry silo mortar plant shall be of a non-reflective nature and shall be retained for the duration of the development hereby permitted. The development shall be carried out strictly in accordance with the approved details and there shall be no replacement, or changes to the materials used externally on the buildings unless they have been approved in writing in advance by the County Planning Authority.

Surface Water Drainage

9. Prior to the commencement of this development hereby permitted, details of a scheme for the disposal of foul and surface waters shall be submitted to and approved by the County Planning Authority. The approved scheme shall be implemented before the construction of impermeable surfaces draining to the system.

Groundwater/ Contaminated Land

10. If during development, contamination not previously identified, is found to be present at the site then no further development shall be carried out until the developer has submitted, and obtained written approval from the planning authority for details of how this unsuspected contamination shall be dealt with unless otherwise agreed in writing with the County Planning Authority.
11. Prior to the commencement of the development hereby permitted, a risk assessment and methodology for any piling at the site shall be submitted to and approved in writing by the County Planning Authority. Piling or any other foundation designs using penetrative methods will not be permitted other than with the express written consent of the County Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

Highway, Traffic and Access

12. The means of access to the development shall be from the B2235 Godstone Hill only utilising the internal route as permitted and constructed in accordance with Planning Permission ref: TA02/0183 and RE02/02668 dated 19 July 2004 and subsequent variation permitted within Planning Permission ref: TA02/183/A1 and RE05/1115 dated 23 June 2005; and details approved by Planning Permission ref: TA04/1388 and RE04/2106 dated 17 December 2004. There shall be no means of access from North Park Lane and A25 Bletchingley Road except for vehicles delivering to the local area

Noise

13. When measured at, or recalculated as at, at least 3.5m from any noise sensitive property, the level of noise emitted as a result of the use of blower is limited to 45 LAeq between 0600 to 0730; and 55 LAeq from 0730 to 1900 Monday to Friday
14. All vehicles plant and machinery operated within the site shall be maintained in accordance with the manufacturers specification at all times and where necessary shall be fitted and used with effective silencers and/or noise insulation.
15. When measured at, or recalculated as at, a height of 1.2m at least 3.5m 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:
 - a) 55 LAeq or 60 L01 for any 0.5 period during 0700 to 1800 hours Monday to Friday and 0700 to 1300 hours Saturday
 - b) 50LAeq or 55 L01 for any 0.5 hour period during 1800 to 2300 hours Monday to Friday, 1300 to 2300 hours Saturday and 0700 to 2300 hours Sundays
 - c) 36 LAeq or 40 L01 for any 0.5 hour period during 2300 to 0700 hours on any day.
16. During the period of construction for the development hereby permitted the level of noise arising from such construction, when measured or recalculated as at, a point at least 3.5m from any noise sensitive property during any 0.5 hour period shall not exceed 70 LAeq or 75 L01 between 0800 to 1700 hours Monday to Friday and 65 LAeq or 70 L01 from 0900 to 1300 on Saturdays. No construction work shall be carried out outside these times.

Dust

17. 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. If such an emission should occur appropriate 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.

Lighting

18. Prior to the commencement of the development hereby permitted, details of any external lighting system or floodlighting, shall be submitted to and approved in writing by the County Planning Authority. The submitted scheme shall include height and location of any floodlighting, intensity and brightness of the lights specified in LUX levels, spread and direction of light including approximate light spillage to the rear of the lighting in metres, frequency of use and hours of illumination and any measures proposed to minimise the impact of floodlighting. Development shall be carried out in accordance with the approved details.

Reasons

1. To comply with the terms of the application and 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 terms of Surrey Structure Plan 2004 Policies SE1, DN17 and LO4; and Tandridge District Local Plan 2001 Policy RE2
2. 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
3. To enable the County Planning Authority to exercise control over the site for the development hereby permitted and comply with Schedule 5 paragraph 1 of the Town and Country Planning Act 1990.
4. To comply with the terms of the application and to protect the amenities of local residents in accordance with Surrey Structure Plan 2004 Policy SE1 and DN2; Surrey Minerals Local Plan 1993 Policy 1; and Tandridge District Local Plan 2001 Policy MO13
5. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Surrey Structure Plan Policy 2004 DN2
6. To enable the County Planning Authority to control the development and to monitor the site to ensure compliance with the planning permission to comply with Surrey Structure Plan 2004 Policies SE1 and DN17
7. To protect the amenities of local residents in accordance with Surrey Structure Plan 2004 Policy SE1 and Surrey Minerals Local Plan 1993 Policy 1
8. To retain proper planning control over the development and in the interests of safeguarding the environment and local amenity in accordance with Surrey Structure Plan 2004 Policy SE1 and SE8; and Surrey Minerals Local Plan 1993 Policy 1
9. To prevent pollution of the water environment.
10. To ensure that the development complies with approved details in the interests of protection of Controlled Waters.
11. To ensure that the development complies with approved details in the interests of protection of Controlled Waters.
12. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Surrey Structure Plan Policy 2004 DN2
13. To ensure the minimum disturbance and avoid noise nuisance to the locality to comply with Surrey Structure Plan 2004 Policy SE1 and Tandridge District Local Plan 2001 Policy EV10
14. To protect the interests of local residents in accordance with the terms of Surrey Structure Plan 2004 Policy SE1, Surrey Minerals Local Plan 1993 Policy 1; and Tandridge District Local Plan 2001 Policy EV10
15. To adequately control the development in order to ensure minimum disturbance and avoid nuisance to the locality to comply with Surrey Structure Plan 2004 Policy SE1 and Tandridge District Local Plan 2001 Policy EV10

16. To adequately control the development in order to ensure minimum disturbance and avoid nuisance to the locality to comply with Surrey Structure Plan 2004 Policy SE1 and Tandridge District Local Plan 2001 Policy EV10
17. In the interests of local amenity and to comply with Surrey Structure Plan 2004 Policy SE1 and Surrey Minerals Local Plan 1993 Policy 1
18. To reduce the impact on the visual amenities of the locality to comply with Surrey Structure Plan 2004 Policies L04 and SE8 and Surrey Minerals Local Plan 1993 Policy 1

Informatives

1. The applicant's attention is drawn to the advice and requirements of the Environment Agency as detailed in their letter dated 8 November 2007 and attached to this document.
2. The applicant's attention is drawn to the advice and requirements of the Health Protection Agency as detailed in their response dated 10 September 2007 and attached to this document
3. The permission hereby granted shall not be construed as authority to carry out works on the highway. The applicant is advised that a licence must be obtained from the Transport Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway.
4. The applicant 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 Transport 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).
5. 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 5810: 1979) or any prescribed document replacing that code.

THE TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE) (ENGLAND) (AMENDMENT) ORDER 2003

Reasons for the Grant of planning permission and development plan policies/proposals relevant to the decision.

The development will provide the following benefits:

- 2 is in accordance with the development plan policies so far as they are relevant to the application and there are no material considerations which indicate otherwise; and
- 3 any harm can be adequately mitigated by the measures proposed in the application, Environmental Statement and the conditions subject to which planning permission is granted.

The proposal has been considered against the following development plan policies/ provisions:

Regional Planning Guidance Note for the South East (RPG9)

Policy E3 – Green Belts

Policy E7 – Air and Water Quality

Policy M1 – Managing the Demand for Minerals

Surrey Structure Plan 2004:

Policy LO4 – The Countryside and the Green Belt
Policy SE1 – Natural Resources and Pollution Control
Policy SE3 – Flooding and Land Drainage
Policy SE6 – Biodiversity
Policy SE7 – Nature Conservation
Policy SE8 – Landscape
Policy DN2 – Movement Implications of Development
Policy DN17 – Mineral Workings and Restoration

Surrey Minerals Local Plan 1993:

Policy 1 – Environmental and Amenity Protection

Tandridge District Local Plan 2001

Policy RE2 – Development in the Green Belt Outside Settlements
Policy RE15 – Landscape Character
Policy RE16 – Areas of Outstanding Natural Beauty
Policy RE17 – Areas of Great Landscape Value
Policy MO13 – Movement and New Development
Policy EV4 – Drainage and Sewerage of Foul and Surface Water
Policy EV5 – Water Supply
Policy EV6 – Water Quality
Policy EV10 – Noise

**HUMAN RIGHTS ACT 1998
GUIDANCE FOR INTERPRETATION**

The Human Rights Act 1998 does not incorporate the European Convention on Human Rights into English law. It does, however, impose an obligation on public authorities not to act incompatibly with those Convention rights specified in Schedule 1 of that Act. As such, those persons directly affected by the adverse effects of decisions of public authorities may be able to claim a breach of their human rights. Decision makers are required to weigh the adverse impact of the development against the benefits to the public at large.

The most commonly relied upon articles of the European Convention are Articles 6, 8 and Article 1 of Protocol 1. These are specified in Schedule 1 of the Act.

Article 6 provides the right to a fair and public hearing. Officers must be satisfied that the application has been subject to proper public consultation and that the public have had an opportunity to make representations in the normal way and that any representations received have been properly covered in the report.

Article 8 covers the right to respect for a private and family life. This has been interpreted as the right to live one's personal life without unjustified interference. Officers must judge whether the development proposed would constitute such an interference and thus engage Article 8.

Article 1 of Protocol 1 provides that a person is entitled to the peaceful enjoyment of his possessions and that no-one shall be deprived of his possessions except in the public interest. Possessions will include material possessions, such as property, and also planning permissions and possibly other rights. Officers will wish to consider whether the impact of the proposed development will affect the peaceful enjoyment of such possessions.

These are qualified rights, which means that interference with them may be justified if deemed necessary in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

Any interference with a Convention right must be proportionate to the intended objective. This means that such an interference should be carefully designed to meet the objective in question and not be arbitrary, unfair or overly severe.

European case law suggests that interference with the human rights described above will only be considered to engage those Articles and thereby cause a breach of human rights where that interference is significant. Officers will therefore consider the impacts of all applications for planning permission and will express a view as to whether an Article of the Convention may be engaged.

CONTACT

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BACKGROUND PAPERS

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

Government Guidance

Planning Policy Guidance Note 2 (PPG2) – Green Belts

Planning Policy Statement 7 (PPS7) – Sustainable Development in Rural Areas

Planning Policy Guidance Note 13 (PPG13) – Transport

Planning Policy Statement 23 (PPS23) – Planning and Pollution Control

Planning Policy Guidance Note 24 (PPG24) – Noise

Minerals Planning Statement 1 – Planning and Minerals

Minerals Planning Statement 2 – Controlling and Mitigating the Environmental Effects of Minerals Extraction in England

The Development Plan

Regional Planning Guidance for the South East (RPG9)

Surrey Structure Plan 2004

Surrey Minerals Local Plan 1993

Tandridge District Local Plan 2001

Other Documents

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Volume 1, July 2007, DEFRA

“The Future of Surrey’s Landscape and Woodlands”, Surrey County Council, 1997

“Guidelines for Noise Control: Minerals and Waste Disposal”, Surrey County Council, 1994

The South East Plan, South East England Regional Assembly, March 2006
