



The Planning
Inspectorate

Report to Surrey County Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE SURREY MINERALS PLAN

PRIMARY AGGREGATES

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 15 June 2010

Examination hearings held on 30 November, 1, 6, 8, 14 December 2010 and 20 January 2011

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Abbreviations Used in this Report

AA	Appropriate Assessment
AGLV	Area of Great Landscape Value
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
ARDPD	Aggregates Recycling DPD
BAP	Biodiversity Action Plan
CC	Surrey County Council
CD	Core Document
CS	Core Strategy
DPD	Development Plan Document
EA	Environment Agency
ES	Environmental Statement
GOSE	Government Office for the South East
HA	Highway Authority
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
IC	Inspector's Change
LPA	Local Planning Authority
mt/mtpa	Million tonnes/million tonnes per annum
MPA	Mineral Planning Authority
MPG	Minerals Planning Guidance
MPS	Minerals Planning Statement
MWDS	Minerals and Waste Development Scheme
NE	Natural England
#/para	paragraph
PADPD	Primary Aggregates DPD
PALAR	Primary Aggregates Land Assessment Report
PC	Proposed Change
PCPA	Planning and Compulsory Purchase Act 2004
PMZ	Potential Mineral Zone
PPS	Planning Policy Statement
RS	Regional Strategy
RSPB	Royal Society for the Protection of Birds
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SEP	South East Plan
SEERAWP	South East England Regional Aggregate Working Party
SMC	Suggested Minor Change
SMP	Surrey Minerals Plan
SNCI	Site of Nature Conservation Importance
SOS	Secretary of State
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSCS	Surrey Sustainable Community Strategy
SSSI	Site of Special Scientific Interest
TA	Transport Assessment

Non-Technical Summary

This report concludes that the Surrey Minerals Plan Primary Aggregates Development Plan Document provides an appropriate basis for the planning of the County over the next 15 years. The Council has sufficient evidence to support the preferred areas identified and can show, in almost all cases, that they have a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Textual changes to reflect the publication in March 2010 of the Secretary of State's Proposed Changes to Policy M3 of the South East Plan.
- Changes to the tables and numbers in the text to clarify the resource position in the light of the publication of the Secretary of State's Proposed Changes and the reduced sub-regional apportionment for Surrey.
- Replacement of the monitoring framework to be consistent with the Core Strategy.
- Textual changes to be consistent with the Core Strategy.
- Inclusion of a new appendix to show the relationship between saved policies of the 1993 Minerals Local Plan and the Primary Aggregates Development Plan Document.
- Deletion of preferred area I as the proposal is neither justifiable nor deliverable.
- Deletion of preferred area Q as the proposal is not sound.

Most of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

Introduction

1. This report contains my assessment of the Surrey Minerals Plan (SMP) Primary Aggregates Development Plan Document (PADPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (PCPA). It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement 12 (PPS12) (#4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft PADPD (June 2010) which is the same as the document published for consultation in November 2009, together with the post-publication changes (CD5).
3. The County Council (CC) published further proposed changes after submitting the PADPD to the Secretary of State (SOS). These addressed other points raised in the representations and at the hearings and points I raised, as well as dealing with the Secretary of State's announcement of 6 July 2010 of the revocation of the South East Plan (SEP). Other changes were suggested during the course of the hearings and in response to the High Court's decision of November 2010 which confirmed that the SEP continues to form part of the development plan. Updated and composite schedules of the Councils' proposed changes and suggested minor changes were published in January 2011 [CD523, CD524].
4. All the changes that the Council has put forward have been publicised on the Council's website and notified to all representors. Any responses to the changes made in writing or at the hearing sessions have been taken into account.
5. My report deals with those changes that are needed to make the DPD sound and they are identified in bold in the report. All but six of these changes have been proposed by the Council and are presented in Appendix A (**PC**). The changes that I recommend are set out in Appendix C (**IC**). None of these changes materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken.
6. Many of the other changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although they improve the clarity and coherence of the plan. These changes (SMC) are shown in Appendix B. I am also content for the Council to make any additional minor changes to page, figure, paragraph numbering and to correct any spelling errors prior to adoption.
7. References in my report to documentary sources are provided thus [], quoting the Core Document [CD] number in the Examination Library.

Legal Compliance

8. Issues were raised in representations and at the hearings concerning

compliance with legal requirements, particularly in relation to the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). They are addressed fully in the report on the Core Strategy (CS) along with matters relating to Habitats Regulations Assessment (HRA) and conformity with the Regional Strategy (RS). The report concludes that the legal requirements for the CS have been met. No further evidence was brought forward at the hearings which might lead to a different conclusion on the PADPD. Although this report refers to matters of detail in relation to individual sites and the SA/SEA work carried out, overall it remains the view that the SA/SEA has contributed to the evidence base, has been comprehensive and adequate and formed an integral part of the plan preparation process. Although not itself a vehicle for decision making, it has informed the evaluation of alternatives and is proportionate to the plan. This requirement has therefore been met.

Assessment of Soundness

Preamble

9. On 23 March 2011, subsequent to the examination hearings, the Minister of State for Decentralisation made a Written Ministerial Statement on 'Planning for Growth' setting out the key role of the planning system in ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible. The earlier 2006 Minerals Planning Statement 1 (MPS1), in its first sentence, describes minerals as '*essential to the nation's prosperity and quality of life*' and, as advocated in the Ministerial Statement, the CC is fulfilling its responsibility to deliver an up to date Minerals Plan which makes provision for sustainable development to support economic growth.
10. Regard has been had in this report to the principles set out in the Ministerial Statement and to the views of the County Council and representors on it. It raises no issues that suggest a need to alter the proposals in either the CS or the PADPD or their supporting evidence base.

Main Issues

11. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings 4 main issues are identified upon which the soundness of the DPD depends.

Issue 1 – Whether, taken as a whole, the preferred areas identified in the PADPD have a sound basis, having regard to the regional context and sub-regional requirement, and whether they provide for sufficient quantity and type of primary aggregate.

Preamble

12. The PADPD has been drawn up in conformity with the Minerals and Waste Development Scheme (MWDS) [CD27]. It is one of a suite of documents which are to be used to control minerals development across the county until 2026. The CS [CD1] sets the broad geographical distribution for minerals development and the production figures which are required to meet the County's share of regional production. It also contains development management policies. In addition the CC is preparing an Aggregates Recycling

DPD (ARDPD) [CD73] and there is a draft Minerals Site Restoration Supplementary Planning Document (SPD) [CD76].

13. The vision and relevant objectives from the CS have been carried forward into the PADPD subject to the same textual changes which are necessary for soundness (**PC/3, PC/12**). The spatial strategy and the provision to be met are set out in policies MC1 and MC7 of the CS and these set the context for the identification of preferred areas in this DPD. The purpose of the PADPD is to identify new sites which are required to meet the CS provision, taking into account the separate requirements for concreting aggregate and soft sand, and having regard to the supply from sites which are already in production and which have planning permission. Although it was suggested that it would be helpful to have a list of these sites appended to the plan, the plan period extends to 2026 and the list would have soon become dated. Existing sites are already included and regularly updated in the Council's Annual Monitoring Report (AMR) [CD28]. They are to be included on the districts' Local Development Framework proposals maps as a suggested minor change to the CS and so there is not a strong case for them to be specifically identified in the PADPD. The Council has suggested a minor change to the introductory paragraphs to correct an error and clarify that the PADPD covers the period 2009 to 2026 (not 2010 to 2026). To be consistent with the CS and comply with PPS12, changes are also proposed to include the policies from the Minerals Local Plan 1993 that will be superseded as an appendix to the PADPD (**PC/1, PC/2**).

Regional context and sub-regional requirement

14. The primary aggregates sub-regional apportionment for Surrey is set out in policy M3 of the SEP [CD400] at 2.62 million tonnes per annum (mtpa) and #10.89 requires mineral development documents to include policies that reflect the sub-regional apportionment figures. The SEP noted that the then regional planning body was in the process of undertaking a review of the apportionment. That partial review was subject to examination in 2009 and following the publication of the PADPD, in March 2010 the SOS published his Proposed Changes to policy M3 of the SEP, reducing Surrey's requirement for 2010-2026 to 1.27mtpa [CD417].
15. Following the submission of the DPDs, the SOS announced the revocation of regional strategies including the SEP but Mineral Planning Authorities (MPAs) in the South East were advised to work from the figures in the Proposed Changes [CD418]. The CC's statement about the implications of this for the DPDs was published before the hearings commenced [CD507]. On 10 November 2010 the High Court confirmed that regional strategies continued as part of the development plan. The views of interested parties on this were sought at the PADPD hearings and are taken into account in this report.
16. Policy MA1 is consistent with CS policy MC7 and it is useful to have a reference to the 24mt provision figure in both DPDs. The issue as to whether this level of provision is reasonable and appropriate, or if it should be reduced to reflect the SOS's Proposed Changes, is addressed in the CS report (#113) which concludes '*the flexibility provided for (by the 24mt) in CS policy MC7 is justified, the most appropriate strategy and will be effective*'.

17. The PADPD, as submitted, sets out high and low estimates of resource requirements, based on the SEP apportionment and the lower figure proposed in the Partial Review. The Council now proposes changes to the text of Chapters 5 and 6 and the inclusion of new tables to refer and take account of the SOS's Proposed Changes and to clarify the resource position (**PC/4 – 6, PC/7-10, PC/11, PC/13, PC/14**). They reduce the lower limit of the range of the guideline requirements which the plan should be addressing. In the light of the recommended changes (set out in Appendix C) further consequential amendments will be needed to Tables 3 and 4 (**IC1, IC2, IC3**) and to the text of paragraphs 6.10, 6.11 and 6.12, replacing that proposed in the Council's changes PC/7-10 (**IC4, IC5, IC6**). These changes are consistent with those proposed to the CS and are necessary for soundness.
18. Applying the Proposed Changes' requirement to the whole of the plan period would require 21.59mt to be provided as compared to the CS requirement of 24mt. However the Proposed Changes refer to the period 2010 to 2026 whereas the PADPD period is 2009-2026. Paragraph 6.2 clarifies that for 2009 the CC has used the SEP requirement of 2.62mt. Whilst the Council accepted sales at this level are unlikely to have been achieved in 2009 and it is in excess of the 2008 sales figure of 1.36mt, it is consistent with the adopted SEP with which the DPD must be in general conformity. In any event, to substitute an alternative figure would be an academic exercise in that it would not alter the requirement for 24mt in CS policy MC7 and in PADPD policy MA1, put forward by the CC for reasons of flexibility and deliverability, and which is endorsed in the CS report.

Separate requirements for concreting aggregate and soft sand

19. In line with MPS1 Annex 1 #4.5, the Proposed Changes' policy M3 confirms that MPAs should make separate landbank provision for soft sand and for concreting aggregate where possible and appropriate. In Surrey concreting aggregates and soft sands generally come from different parts, are used for different purposes and serve different markets. The 68:32 split identified in the plan is based on past production figures. These have been reasonably consistent over recent years, despite a general decline in the output of both concreting aggregate and soft sand since 2002. Policy MA1 applies the same ratio to aggregate provision over the plan period setting annual average rates of production of concreting aggregate and soft sand of 0.9mt/0.5mt, which are consistent with the resources identified as available over the plan period.
20. Some at the hearings argued for a lower annual production figure for soft sand, but this was generally predicated on the overall provision figure for Surrey being reduced, an argument also pursued at the CS hearings and which is addressed, but not supported, in the report on the CS. Various figures and ratios were put forward, mainly suggesting a lower annual average rate for soft sand because of low market demand for existing reserves. However no compelling evidence was put forward that would alter the need for preferred areas to be identified for concreting aggregate and soft sand, of the general order set out in policy MA1, in order to contribute to overall supply. The Council's approach to the production figures for concreting aggregate and soft sand in policy MA1 is robust, founded on credible evidence and is justified.

Reserves

21. Permitted reserves provide the plan's baseline. The evidence on reserves is taken from the Council's Annual Monitoring Reports (AMRs) [CD28, CD47-49]. Recent upward adjustments in the AMRs have added over 2mt to reserves, not all of which has been accounted for by new permissions or re-assessments of reserves. However a similar pattern of upward adjustment of reserve figures has been identified by other counties in the South East [CD404-405]. The information on reserves is collated from individual returns. The returns are confidential but the CC confirmed that it clarifies with the operator any reserve estimates that are unexpected. The CC has prepared Annual Monitoring Reports for the past 24 years, the last 4 reports as required by Government policy and regulation. No other method of setting the baseline has been shown to be more reliable. The AMR 2008/09 is the best information currently available and the CC is justified in using its figures on reserves as the baseline for the plan.
22. In calculating provision to be made in the plan, the permitted reserves of soft sand have been discounted by 2.28mt because production at Moorhouse Sandpit will continue after 2026. A number argued at the hearings that all its reserves should be included as contributing to supply during the plan period, there being no restriction by condition on output. However that assumes willingness on the part of the owner and operator to step up the current level of production, the physical means to do that and a market demand for the product from that site. Evidence from the CC was that permission was to 2030, the reserve was seen by the owner as long term, the site was worked as part of the operation of a large country estate and there is a close alternative source of sand at Westerham, Kent. In accord with #70 of the Practice Guide to MPS1, all the site's reserves count towards the landbank but that is a rather different issue than the question here as to what should count as part of the baseline. The view taken by the Council is reasonable that where there is evidence that a site will continue to be worked beyond the plan period, not all of its reserves should count as contributing to the plan's supply. In a similar way, where allocated sites will continue to be worked post 2026, only the yield pre 2026 is taken as contributing towards meeting the plan's requirement.
23. Working of the silica sand preferred area at Pendell Farm is likely to produce high iron sand, the CC's original estimate being 2.5mt but later, with better information from the operator, reduced to 1mt. Given the quality of the sand at Pendell Farm and the importance of the identified resource for industrial and non-construction aggregate uses, it is unlikely that the operator will give any priority to the production of soft sand. The operation of the quarry and the processing is set up to concentrate on the higher value industrial sands and any specialist co-products [CD600]. Whilst any building sand co-product could be sold from the site, there is insufficient evidence that the quantity and availability of this supply would be suitably consistent to be relied upon as a major source of soft sand over the plan period. As to the Chilmead Farm silica sand area of search, this is identified for the longer term.

Site selection

24. The Council's objectives for the county and the issues to be addressed are clear and are backed up by a comprehensive evidence base. This provides the

justification for the selection of the preferred areas from the much larger number of potential mineral zones (PMZs) that have been considered throughout the process. The evidence includes the 2004 PMZ report [CD64]; the primary aggregates land assessment report (PALAR) [CD22] which considered the suitability and deliverability of the PMZs; the Environmental Reports [CD2, CD78] and Revised Environmental Report [CD80] which assessed the environmental and sustainability credentials of the PMZs; the GWP consultants' report [CD21] which looked at potential yields from selected sites; the strategic flood risk assessment [CD9]; the strategic transportation assessment [CD16], the hydrological assessment [CD24], the transportation assessment [CD23]; the Landscape and Visual Impact Assessment [CD63] and the Habitats Regulations Assessment [CD8].

25. All of this evidence formed a solid foundation for a thorough assessment of the alternative sites and it demonstrates that the selection process followed by the Council has been robust. It also provides the justification for the preferred areas that are allocated. Criticisms of the site selection exercise undertaken in the PALAR and of the SA/SEA were addressed in the CS report and concluded not to be well founded. The broad distribution of sites in the PADPD accords with the spatial strategy set out in the CS and is sound. Concerns about traffic, hydrology, air quality, restoration, and other matters are discussed below in terms of the key development requirements for the preferred areas and are matters that will be addressed again in detail at the application stage.

Provision for primary aggregates

26. In preparing the CS and PADPD, the Council recognised that the pressure at that time to deliver the SEP requirement could not be fully met, particularly bearing in mind the already extensive workings in the county, that resources, particularly those suitable for concreting aggregate, are becoming increasingly scarce, and the environmental constraints on those resources remaining. The most accessible resources have already been used, and those remaining are becoming more difficult to exploit either because of their potential impact on local communities or the environment, because they are too small to be economically viable, or because land ownership issues prevent working.
27. Although the sub-regional requirement has been reduced in the SOS's Proposed Changes, there remains a need to allocate a number of preferred areas for primary aggregates working in Surrey. Against this background of continued demand and constrained resources and the steer provided by the CS and the SEP Proposed Changes, the PADPD represents a pragmatic and sustainable approach to the way forward.
28. The selection of preferred areas had regard to geological information, likely availability of the PMZs for mineral extraction including land ownership and mineral operator interest, access, proximity to any international/national designations for nature conservation, landscape or heritage, hydrology and detailed considerations. These included proximity to residential areas, potential mitigation and cumulative impacts. This approach reflects national, regional and local planning objectives and is supported. Overall the process of selection of sites for delivery and their phasing is appropriate.
29. Site-specific matters are considered in more detail below but the overall

conclusion is that two of the preferred areas (I and Q) are not sound because there is no reasonable certainty of their delivery. The consequences of the recommended changes are that in the county as a whole there would be less potential resource identified compared with the estimated requirements for concreting aggregate and soft sand (**IC3, IC4**). However preferred area I is the smallest concreting aggregate site and the shortfall will be manageable given that additional resources from Whitehall Farm (preferred area E) are already anticipated and the planning application for Manor Farm (preferred area J) indicates a higher site yield than estimated. As to preferred area Q, the plan already indicates a potential surplus of soft sand resources available to meet requirements in the plan period. The proposals remain sufficiently flexible to accommodate changes in circumstances over the course of the plan period.

Landbanks

30. Continuity of supply is an important objective of national mineral planning policy and this is determined by having regard to the landbank position. In accord with MPS1, CS policy MC7 seeks the maintenance of a landbank of at least 7 years for aggregates. The current landbank for concreting aggregate is well below that, whilst at the end of 2008 the landbank for soft sand (which include the permitted reserves at Moorhouse Sandpit to be worked post 2026) was almost 14 years (**PC/11**). Subject to the identified preferred areas being brought forward (and applications have already been made or are anticipated for 4 of them), adoption of the PADPD will provide reasonable certainty of an adequate landbank for concreting aggregate being maintained at least for the early part of the plan period. Indicators are proposed to monitor the landbank situation but the Council has made clear in the plan that unconstrained resources are dwindling and it will be for future debate by the South East England Regional Aggregate Working Party (SEERAWP) to determine what should be an appropriate apportionment for Surrey to plan for when reviewing the PADPD.

Alternative sites

31. A number of alternative sites were put forward during the examination, including some that had been considered during the preparation of the PADPD. However given the conclusion about the adequacy of the supply, despite shortcomings in two of the Council's preferred areas, the question then becomes whether any of the alternative sites would perform better than those identified in the plan. For reasons set out in more detail below, it is concluded that none would. It will be for the Council to consider and evaluate the suitability of any of these sites for extraction when and if applications are made, having regard to the CS and PADPD policies, including policy MC11 which deals with extraction outside preferred areas. No additional or alternative sites are recommended for inclusion as preferred areas in the plan.

Delivery

32. In terms of implementation, the preferred areas will be brought forward by the mineral industry. Deliverability was a key consideration in their selection and, other than preferred areas I, K and Q which are discussed below, there is mineral operator ownership of/interest in all the others. There is no evidence

that they are not committed to progressing their delivery. Overall the DPD is likely to be effective.

33. Taken as a whole the conclusion on the first issue is that, subject to my recommendations, the identification of the preferred areas is sound in principle, has regard to the regional context and sub-regional requirement for Surrey and provides for sufficient quantity and type of primary aggregate. Adoption of the DPD will provide an improved supply and a firm basis to meet requirements over the next 15 years. This would accord with national, regional and local policy.

Issue 2 – Whether the identified preferred areas are properly justified and are likely to be delivered.

As concluded above, the PADPD is sound in principle. Accordingly the following sections only consider specific points about the preferred areas that give rise to concerns about potential unsoundness.

Policy MA2 – preferred areas for concreting aggregate

34. Policy MA2 identifies 11 preferred areas in the NW of Surrey which together would provide around 13mt of concreting aggregates. Other than preferred areas I and K (see below), there is mineral operator interest in all the preferred areas. Applications have been made for 3 of the preferred areas (D, F and J) and an application is being prepared for preferred area L. It is not the purpose of this report to consider the detail of those applications. Notwithstanding the material submitted and the concerns raised at the hearings, only those matters are addressed that go to questions of soundness. That is whether the preferred areas identified in the plan are justified and effective and whether there is sufficient detail in the key development requirements to give certainty to a developer, and comfort to the Council and local community, that an application will cover the principal matters of concern. The grant of permission in respect of the applications that have been made is a matter for the CC, as the mineral planning authority, to consider in another context which will include having regard to the development management policies in the CS, which have been found to be sound.
35. Dealing first with those areas where applications have been advanced, **preferred area F** would be an extension to Home Farm Quarry. It would be the final phase of that operation and worked in a similar manner, with material taken off site by conveyor to the Littleton Lane processing plant, and there is no evidence that this would give rise to any additional adverse impact on air quality in the Borough. Former mineral workings to the south have been successfully restored for agriculture and this site could be restored to a similar high standard. In line with advice from the Environment Agency (EA), hydrological and hydrogeological assessments were carried out for the Environmental Statement (ES) which conclude that the implications of dewatering could be adequately mitigated [CD615]. Potential impacts on the Thorpe Park No. 1 Gravel Pits Site of Special Scientific Interest (SSSI) component of the South West London Waterbodies Special Protection Area (SPA) and Ramsar site were addressed in the HRA and appropriate assessment [CD8]. Subject to the Council's suggested minor changes, the key development requirements are reasonable and justified to secure an

appropriate standard of development.

36. Working at Manor Farm, Laleham (**preferred area J**) is to be phased to follow preferred area F and the submitted application proposes a link to the existing conveyor system at Home Farm Quarry to transfer material to the Littleton Lane plant for processing. Off-site processing, substantial advance planting and suitable unworked margins would minimise any impacts on those living around the site. The application indicates a greater resource of 1.5mt than that estimated in the plan (1.3mt), which would help to cover the identified gap in provision. The key development requirements, as submitted, indicate that because of the lack of direct access restoration would be restricted to areas of open space and open water. However methods may be developed in the future that make it feasible to import fill by means other than by road and the Council's suggested minor change leaves (SMC/44) open the possibility of an alternative restoration option being considered and introduces an acceptable degree of flexibility.
37. Milton Park Farm (**preferred area D**) and Whitehall Farm (**preferred area E**) are to be worked consecutively, to avoid cumulative impacts. Hanson's application for Milton Park Farm is currently being processed [CD612]. Although information about Whitehall Farm is less comprehensive, the key development requirements are clear that it is intended to come forward only after Milton Park Farm has been worked and to use the same access and processing plant. The need for suitable unworked margins to minimise the impact on the surrounding residential areas and the Grade II listed buildings and their settings is identified. The plan also identifies the need for a hydrogeological assessment to consider the implications of dewatering on the local aquifers, groundwater flow and connectivity with Thorpe Park No. 1 Gravel Pits SSSI with provision of sufficient information for an Appropriate Assessment (AA) to be undertaken, if required, to protect the integrity of the South West London Waterbodies SPA and Ramsar site. The key development requirements are also clear as to the form of restoration envisaged for the site recreating a landscape of open grazed parkland. Subject to the Council's suggested minor change referring to the guidance on preparing project level flood risk assessment (a change made to the key development requirements for every area), the key development requirements are justified and give appropriate direction and guidance to the developer and the local community as to the matters to be addressed as part of any proposal for mineral extraction.
38. Many of those at the hearing raised concerns about particular details of the application for Milton Park Farm, including the location of the processing plant, the impact of the conveyor, the transport assessment (TA) and the routing of mineral traffic, the impact on the landscaping and setting of Milton Park, the impact on Great Fosters (a Grade I listed building), the proposed method of working and the implications of extraction and infill on the hydrology of the site and surrounding area. Whilst it is for the CC, as MPA, to consider the particular details of the application that has been made, in the light of the objections made and consultation responses, the key development requirements for preferred area D identify these all as matters that need to be addressed in any proposal for mineral extraction.
39. Local people referred to the Egham area already suffering a high degree of

traffic congestion, particularly at peak times, and with Airtrack down time at the level crossings would increase making the current situation even worse. However there was no evidence that the potential additional traffic on the network as a result of the proposed extraction would itself give rise to such significant adverse effect as to justify ruling out this site. It would be possible for a scheme to be designed to provide for lorries waiting to pick up loads early morning, if this were considered to be a problem, and routing obligations negotiated with the mineral operator could ensure mineral traffic avoids Egham town centre and other pinchpoints.

40. The northern segment of the area is the preferred location for the processing plant which would be retained for the duration of working on areas D and E. Regard would have to be had to Green Belt policy and the plant area would have to be carefully designed and sited away from Manorcroft School. As for all other mineral sites, permission will not be granted unless it can be demonstrated that the scheme would not harm the living conditions of those living nearby or the amenity of those attending the school by reason of dust, noise, lighting, smell and visual intrusion. Protocols, guidance and policies exist which show how a quarry, and its associated plant, can be developed and operated without causing such harm and the design of the scheme, supported by planning conditions, would regulate the development. Similarly the provision of suitable unworked margins, advance planting and a well designed programme of working and progressive restoration would minimise the impacts on properties around the extraction area and on the character and setting of the nearby listed buildings and registered park and garden. It may be that, after detailed consideration, the appropriate mitigation is for that part of the site not to be worked. This would only affect the quantity of material removed and extraction would move on slightly earlier to Whitehall Farm.
41. The hydrological assessment of the plan [CD24] indicated no objection in principle to working the area but with further hydrological work required at the application stage to identify any mitigation requirements relating to potential effects of dewatering on local abstraction and groundwater flows. The Strategic Flood Risk Assessment [CD9], agreed with the EA, concludes that whilst part is within flood zone 3a, development is acceptable on flood risk grounds. Detailed assessments submitted as part of the application concluded that subject to consideration of mitigation measures, there would be no significant residual impacts on ground water or surface water and flood risk issues were manageable.
42. Although the EA has lodged a holding objection, at the hearing it advised that it was looking for further assessment and modelling so as to confirm appropriate and acceptable mitigation measures and that the plan's key development requirements for hydrology adequately set out what needs to be done to demonstrate that the area can be suitably worked. The HRA and appropriate assessment [CD8] had identified that working of Milton Park Farm could give rise to impacts on the condition of the habitat at Thorpe Park No. 1 Gravel Pit SSSI, which is a component of the South West London Waterbodies SPA and Ramsar site. However, it concluded that mitigation measures taken to safeguard the major aquifer would reduce any residual risk to the SSSI open water and wetland habitats to an insignificant level. On the evidence presented to the DPD examination, it is reasonable to accept that fluvial flood risk, surface water flood risk and groundwater concerns are capable of being

properly controlled and mitigated to within acceptable limits and such that working would not present a risk of significant adverse effect to the SPA.

43. The Minerals Site Restoration Supplementary Planning Document (SPD) and the key development requirements indicate the restoration of preferred area D by infill to create open grazed parkland. Having considered the likely void space and potential availability of inert fill, the CC is confident that sufficient material will be available to progressively restore the site in a phased manner. The extraction phase would only have a temporary impact on the landscape, albeit perhaps for a number of years. The restoration proposals offer the potential to meet informal recreational, landscape and nature conservation objectives, enhance public access and improve the wider setting of Great Fosters and the other listed buildings around the area with the restored landscape likely to have greater visual and recreational interest and nature conservation value than the site at present.
44. Drawing these points together, preferred areas D and E would make a significant contribution to meeting the provision level for concreting aggregate set out in policy MA1 and any possible concerns about traffic, unneighbourly impact, harm to the environment or hydrology are capable of being satisfactorily addressed through good site design, appropriate mitigation and the use of planning conditions and obligations. Inclusion of these preferred areas in the plan is therefore both justified and effective and accordingly meets the relevant tests of soundness.
45. Watersplash Farm (**preferred area L**) is being progressed by Cemex UK. The key development requirements in the PADPD set out clearly the matters to be addressed in any application and pre-application site investigations are underway including further work to assess the likely yield and a hydrological assessment to determine suitable unworked margins to the River Ash and the method of working. MPS1 does not presume against the use of Grade 1 agricultural land and given the constraints on aggregate resources in Surrey, the potential yield of more than 1mt justifies development subject to a high standard of restoration being achieved, as required by Minerals Planning Guidance 7 (MPG7) and the CS policies. The transportation assessment [CD23] indicates that satisfactory access can be obtained and there is no evidence of cumulative impact issues arising in relation to any proposals in the vicinity. The key development requirements adequately identify the matters that need to be addressed in progressing the preferred area and amenity, air quality, heritage and biodiversity concerns will be considered at the detailed planning application stage, supported as necessary by an ES, TA and other relevant evaluation studies which would identify design constraints and appropriate mitigation.
46. Homers Farm (**preferred area G**) lies to the south of Heathrow Airport, close to the boundary with the London Borough of Hounslow, with frontage to the A30. The transportation assessment [CD23] indicates no objection in principle from the Highways Agency to mineral development here subject to the detailed access arrangements [CD5, CD6] and Hengrove Farm, a nearby site worked by the same operator and which Homers Farm would replace, has direct access onto the A30. Spelthorne is an Air Quality Management Area and this is reflected in the SA/SEA [CD80] and its assessment of air quality issues. A key development requirement is air quality and any application

would have to include a detailed local assessment of the impact of emissions from vehicles and plant, having regard to the proximity of the A30 and the airport. Concerns about dust and noise are understandable but these are matters which can be satisfactorily controlled or mitigated to acceptable levels, having regard to the guidance in MPS2 and its annexes. The site is Grade 1 agricultural land which MPS1 notes should not be developed in preference to areas of poorer quality land, however this option is not available in NW Surrey where all suitable sites have been considered. Subject to assessing any impact on the viability of the agricultural holding and the adoption of recognised techniques of soil handling, storage and re-use, together with progressive working and high quality restoration, there is no reason why, with appropriate monitoring and enforcement, the area should not be capable of being returned to agricultural land of similar quality and the operator has experience of similar operations elsewhere in West London.

47. Gravel extraction from Queen Mary Reservoir, Ashford (**preferred area K**) has taken place over the past 20 years with a consortium of 6 local mineral companies responsible for the operation and processing. A termination agreement has been recently agreed with the owners Thames Water, because it was considered the reservoir did not contain '*commercially workable minerals*'. However it was only in 2009 that permission was granted for continued working, when it must have been thought it would be viable. If not identified as a preferred area, the plan would have to include the site as part of the permitted reserves. It is a reasonable conclusion that the reservoir is likely to come forward for working within the plan period.
48. The King George VI reservoir, another operational reservoir, is also identified in the plan for extraction (**preferred area H**). There is operator interest in working the reservoir and the estimated yield of 3.24mt has been confirmed as realistic. The HRA and appropriate assessment [CD8] undertaken for the plan concluded that there would be no adverse impact from the proposals on the integrity of the South West London Waterbodies SPA and Ramsar site, of which the reservoir is a part. The Royal Society for the Protection of Birds (RSPB) is satisfied that the CC has sufficient information to enable a full assessment of impacts and that, subject to mitigation measures to control areas of winter working and appropriate set off distances, its concerns have been addressed. The method and programming of working are identified in the key development requirements as matters on which further information will be needed when appropriate assessment is undertaken at the project level stage. Suggested minor changes to the plan clarify that any application for development will also need to address the transport and processing of the extracted material, the implications of continued processing at Hithermoor on nearby residents, on the Staines Moor SSSI and on restoration plans for the wider Hithermoor site. The identification of the reservoir as a preferred area is justified and would be effective.
49. The PADPD proposes two preferred areas in the Wey valley. **Preferred area A** is an extension to the existing Cemex UK operation at Addlestone Quarry, where the access and processing infrastructure are already in place. The site is expected to come forward in the earlier part of the plan period with an estimated yield of 0.4mt from the two areas either side of the river. The plan adequately identifies the key development requirements and matters of concern, including hydrology, noise, dust, archaeology and restoration, are

capable of being satisfactorily addressed through good site design, planning conditions and, if necessary, obligations. Inclusion of this site is both justified and effective and accordingly meets the tests of soundness.

50. Hamm Court Farm, Weybridge (**preferred area C**) lies downstream and is within the ownership of a local mineral operator, Henry Streeter (Sand and Ballast) Ltd. It was excluded by the Local Plan Inspector in 1983 and listed in the 1993 Minerals Local Plan [CD30] as a Category 2 site (sites where there is a very strong presumption against working). However the continuing pressure to find workable resources in NW Surrey, and serious environmental constraints ruling out other sites, has led to it being looked at again and identified as a preferred area in the PADPD. The burden of objection related to potential impacts in terms of noise, dust, traffic, loss of biodiversity, harm to heritage assets, visual disturbance and disruption to local residents, the implications for flood risk and surface water drainage and uncertainty about the estimated yield as well as the fear that working Hamm Court Farm would bring pressure for the release of adjoining land at Chertsey Meads.
51. Access would be taken from the Weybridge Road (A317) and the transportation assessment [CD23] indicates no objection in principle to mineral development on the site served by a new traffic signal controlled junction, demand activated by vehicles leaving the site. By physical measures, reinforced by routing obligations negotiated with the quarry operator, all traffic exiting and entering the site could be directed to arrive and leave from the west avoiding the centre of Weybridge. Similarly if the project level TA were to bring up any particular peak hour issues, these could be addressed by condition. With the establishment of suitable stand off distances to Meadowlands Park and the surrounding residential properties and the location of the processing plant close to the access, the potential impact of dust, noise and similar unneighbourly effects are all likely to be capable of control to within acceptable limits (which might include limitations on working hours) and, if necessary, additional mitigation could be required to comply with the CS policies and MPS2. Similarly good site design would ensure there would be no adverse and unacceptable impacts on the setting of the nearby heritage assets.
52. The site is within a major aquifer and hydrology is a key development requirement. The hydrological assessment [CD24] indicates no objection in principle to mineral working, subject to further detailed investigation. A more detailed assessment would need to consider the hydrogeological implications for the scheme, including the high water table, surface water drainage and run off, ground water levels upstream and flood risk. In identifying appropriate mitigation, regard would need to be had to the impact of restoration by infilling on the aquifer and if the site were to be dewatered, the potential to lower the water table, and thereby dry out the wet woodland (a biodiversity action plan (BAP) priority habitat), and possibly draw in contamination from a historic landfill site to the south. However, on the evidence presented to the DPD examination, including the views of the EA personnel present, the potential environmental and hydrological concerns are capable of being properly controlled and mitigated to within acceptable limits.
53. The key development requirements and the draft Minerals Site Restoration SPD [CD76] envisage restoration by infill to wet/seasonally flooded grassland.

This would contribute towards national and local BAP priorities and be compatible with the adjoining Chertsey Meads Local Nature Reserve, part of a larger Site of Nature Conservation Importance (SNCI). It is probable that the restored landscape would have greater visual interest, nature conservation and recreational interest than the site at present. Work on the SPD indicates that enough inert fill is likely to come forward to ensure restoration is timely and progressive.

54. Local residents are concerned that if Hamm Court Farm is worked, Chertsey Meads would come under pressure for extraction. Identified in CD64 as a potential sand and gravel resource (PMZ20), Chertsey Meads is an area of riverside public open space of ecological and landscape importance and the evidence was that the Borough Council as landowner had no interest in mineral working with covenants on the land for use as open space. As it cannot be easily accessed independently, if Chertsey Meads were to be worked, it would have to be linked in some way to Hamm Court Farm. In circumstances where the CC sees aggregate working in NW Surrey coming to an end with the last remaining workable resources being allocated in the PADPD, there is no need or discernible advantage to include any reference to Chertsey Meads in the plan's text for preferred area C.
55. The estimated yield of 0.78mt is based on borehole information from 1970 and 1990 and includes approximately 0.15mt of variable silty sand and gravel. The interested operator has indicated that this material would be worked as part of the development and it is therefore reasonable to count it as part of the available resource. Hamm Court Farm would make a useful contribution to meeting the supply level set in the CS and any concerns about unneighbourly impact or harm to habitats and the environment can be satisfactorily addressed through good site design and planning conditions. Inclusion of the site in the plan is both justified and effective and meets the relevant tests of soundness.
56. Finally **preferred area I** raises concerns. It was a Category 2 site in the 1993 Minerals Local Plan and in 2004 the CC refused permission for it to be worked for sand and gravel as a borrow pit in association with construction works on the M25. Although the Practice Guide to MPS1 describes preferred areas as '*areas of known resources where planning permission might reasonably be anticipated*', and despite the refusal on grounds that included traffic generation and adverse impact on local residents, the Council contended at the hearing that as the site is owned by Cemex UK the expectation must be that it will be brought forward. However this is contrary to the operator's representations [CD19] which refers to the site only ever being promoted as a borrow pit; '*given the small level of reserves..., it will never come forward on any other basis*'; and as CS policy MC4 makes provision for borrow pits, the site should be excluded as a preferred area.
57. PPS12 requires that DPDs to be 'sound' should be '*justified, effective and consistent with national policy*' and effective means, amongst other things, that the document must be deliverable. To be deliverable, it is appropriate to consider whether there is owner and operator interest in a site as they will be the ones making the investment and pursuing an application to bring the site forward and deliver the aggregate to the market. Indeed the likely availability of a PMZ coming forward in the plan period was one of the key considerations

in the Council's selection of the preferred areas, as described in the PALAR [CD22]. For these reasons, the CC is either being remarkably prescient in its contention that despite what was said by the current owner, the site will come forward at some time during the plan period, and that permission is likely to be granted, or is showing a surprising degree of inflexibility.

58. A smaller producer, of course, might look at the circumstances differently and consider that the site could be worked independently. However the CC produced no evidence that there is any other interest in the site. If it were to be brought forward as a borrow pit, CS policy MC4 provides a clear and appropriate policy context. There is no need for the certainty that comes from identification as a preferred area. Given the available evidence, the preferred area is neither justifiable nor deliverable and it is recommended that it be deleted (**IC1**).
59. Subject to the above recommendation, the proposals in the PADPD for concreting aggregates are justified, effective and consistent with national policy and are sound.

Policy MA3 – preferred areas for soft sand

60. There are two preferred areas in the plan for soft sand. Both were the subject of numerous representations in objection to their inclusion in the plan. Whilst identification in the DPD has clearly been unpopular locally, as noted at the hearings, the fact that a site may be unpopular does not of itself make it unsound in terms of the tests set out in PPS12.
61. Objections to **preferred area P**, Mercers Farm, covered the site's deliverability and likely yield, the impact of heavy mineral traffic using the local lanes and travelling along the A25, the implications for hydrology and the safety of the public water supply and for nature conservation and biodiversity interests in the area, the impact on the landscape and on residential amenity. Concerns were also raised about the restoration proposals and the potential for cumulative impacts, if Chilmead Farm, an area of search for silica sand, is also worked. Similar objections were made to the identification of the area of search in the CS and are addressed at #133 - 141 of the CS report.
62. There has been extensive mineral working in the area around Nutfield Marsh and sites either left as water, and restored for recreational or nature conservation purposes, or infilled and there is a large active landfill operation at Patteson Court. The preferred area is unworked ground between the former extensive fuller's earth excavations to the south and the now completed silica sand operations to the north. There is uncertainty about both the quantity and quality of the resource [CD21]. Further borehole information is needed to establish the grading and proportion of fine sands whilst estimates of yield depend on the method of working, in particular whether the site can be worked wet and if so how that would be done, which would determine whether the full depth of the sand can be worked and with what level of efficiency. The area is owned by a local mineral operator who is already undertaking further investigations to inform and resolve these issues and there is no evidence to indicate that the site would not be brought forward to be worked.

Hydrology

63. Hydrology is a key development requirement. The site is within a major aquifer although recent computer remodelling by the EA, to take better account of groundwater flows, has shifted the catchments eastward for the Brewer Street and Warwick Wold public water supplies and now places the site close to, but not within, source protection zone 3 for Warwick Wold (SMC/46). The hydrological assessment for the plan [CD24] indicates that mineral working above the water table would be acceptable but further investigation would be needed if wet working is planned. The hydrology of the Nutfield Marsh area is complicated with historic landfills and lakes formed in former workings. The outcome of detailed hydrogeological assessment will influence how Mercers Farm is worked and its yield. That work is ongoing.
64. Partial dewatering and the discharge of pumped water could affect groundwater and surface water as well as flows in Redhill Brook and it is accepted that mitigation may be required in places to maintain lake levels. The transfer of water between pits, lakes, the aquifer and streams and the implications of dewatering at Mercers Farm on levels at Chilmead Farm, which could affect inflows from the nearby landfill, are all matters that need further work. But whereas the Sutton and East Surrey Water Company maintains that whatever mitigation measures are put in place, there will be an increased risk of pollution to the aquifer (and hence public water supplies), the EA considers that appropriate mitigation is possible and acceptability will depend on the detailed proposals, having regard to any cumulative impacts.
65. A preferred area is one '*where planning permission might reasonably be anticipated (subject to the usual tests of environmental acceptability, if necessary through the use of appropriate conditions to mitigate adverse impacts)*'. Clearly there is more that needs to be done to resolve the method of working and final yield, and thus the life of the quarry. Nonetheless in the joint statement and at the hearing, those representing the EA did not oppose the identification of the preferred area in the PADPD, found the key development requirements to be appropriate, are engaged in continuing discussions with the operator's consultants and consider that the impacts of working the site can be mitigated. In any assessment of a particular risk, the advice in Annex 1: Pollution Control, Air and Water Quality to PPS23 is that Local Planning Authorities (LPAs) should rely on the judgement of the relevant pollution control authority. The EA is the body responsible for conserving and enhancing the quality of surface waters and groundwater and for conserving and enhancing water resources. In these circumstances, it is reasonable for the CC to rely on the views of the EA.

Impacts on amenity, heritage assets and landscape

66. There has been considerable extraction and fill activity in the past in this area and local residents are understandably concerned about harm to their living conditions, especially if both sites are worked at the same time. Having regard to the guidance in MPS2 and in policy MC14, any potential impact in terms of dust, noise and similar unneighbourly effects are all capable of being controlled to within acceptable limits through good site design, supported by planning conditions, to incorporate appropriate stand off distances from the working area and locate haul routes, wheel washing and processing plant away from houses. For the same reasons, the setting of listed buildings around the site could be safeguarded and with progressive working and restoration,

limiting the amount of disturbed land, any intrusion into views from the higher ground of the Surrey Hills Area of Outstanding Natural Beauty (AONB) to the north would be minimised.

Traffic impacts

67. Groups representing residents in Nutfield Marsh, Nutfield, Godstone and the Watercolour development expressed concerns over the impact of quarry related traffic in the area and using the A25 through their villages. The key development requirements set out a comprehensive package of measures required to provide suitable access including local highway improvements and a limitation on heavy goods vehicle (HGV) movements to 240 movements daily. Whilst the Highway Authority (HA) agreed these measures some years ago in the context of another planning inquiry [CD23], it confirmed that the traffic situation had not changed so significantly as to alter its views. With the necessary works to Cormongers Lane and to its junction with Nutfield Marsh Road capable of being carried out within highway land, the local road improvements, cap on lorry movements, design of the site access and routing restrictions (to avoid Church Hill) could all be provided for by a mix of planning conditions and legal obligations negotiated with the mineral operator. Both Mercers Farm and Chilmead Farm are within the control of the same operator and if worked at the same time, an undertaking could be secured to ensure that the total number of HGV movements from the two sites would not exceed 240 movements a day.
68. There is a national cycle route across the Marsh and the area is used by cyclists and walkers. Subject to highway improvements there is no evidence that the amount of additional traffic would be such as to expose them to significantly greater risk of injury or accident. If found to be necessary as a result of a project specific traffic assessment at the application stage, appropriate and proportionate local improvements and controls could be required to safeguard pedestrians and cyclists.
69. Like many junctions in Surrey, at peak times the Cormongers Lane/ A25 junction has queuing traffic. However it is not considered by the HA to currently have a capacity issue nor if it were to be used by an additional 240 HGV movements per day. The 12 hour traffic count carried out by Nutfield residents at the junction showed a marginal increase in total vehicle movements since 1996 (2,582 movements in 2010 compared to 2,498 in 1996) and an apparent reduction in HGV movements (168 one way in 2010 compared to 636 two way in 1996). Whatever the reason for that, any application for mineral extraction at Mercers Farm would need to be accompanied by a project specific transport assessment with an access solution acceptable to the HA [CD23]. There is insufficient evidence to demonstrate that this could not be achieved.
70. Quarry traffic would use the A25. As an all purpose principal route, it is one of the roads in the county intended to be used by HGV traffic. Like many 'A' roads in the UK, it has sections where it narrows and passes through villages where there may be close frontage development and on street parking. However there is no evidence of any capacity or safety issues, or of other development being refused permission because its traffic would use the A25, that suggests the A25 is not able to perform its expected function in the road

hierarchy. Quarry vehicles may be more noticeable to local people but the anticipated numbers are not such that the HA considered their impact would be significant on the primary road network.

Nature conservation interests

71. There is considerable nature conservation as well as recreational interest in the Nutfield Marsh area. The preferred area is in a SNCI and the Nutfield Ridge and Marsh Project has the aim to enhance the character of the area [CD76]. The wet grassland at Mercers Farm is a feeding ground for lapwings and other over-wintering birds and there are protected species on the site. Mineral working could have implications for water levels in the Redhill Brook and in the waterbodies to the north. However the EA is satisfied with the key development requirements which specifically refer to the need for assessment of the potential indirect impacts on ecology and biodiversity from any changes to the hydrological regime, particularly around the Brook. This would include modelling changes in the flow regime and stand off distances to the Brook and assessing the implications of dewatering and the discharge of any pumped water as well as identifying suitable margins to Glebe Lake, a former worked and backfilled mineral site up the slope to the south of Mercers Farm.

Restoration

72. It would be possible to work the site so as to safeguard the nature conservation interest by progressive working and safeguarding the Redhill Brook. Proposals for restoration would be integrated into the broader objectives for the wider area. The PADPD requires the site to be restored to existing levels, and the CC is confident that sufficient suitable material would be available. Infilling would require an environmental permit which would be issued by the EA only after assessment of the hydrological implications, the risk of pollution, stability issues and final restoration levels. An alternative restoration scenario is outlined in the draft Minerals Site Restoration SPD [CD76] with the site left wet. In either case significant biodiversity enhancement is possible.
73. To conclude, preferred area P would make a significant contribution to meeting production levels for soft sand set out in the plan. There are concerns about hydrology, traffic and cumulative impacts and these are identified as key development requirements that need to be addressed before an application for development is made. Additional work will be necessary, at the planning application stage, to provide a more detailed analysis. However the work done so far is appropriate in its detail at this plan making stage to identify whether the site should be put forward for development and how it might be developed. The amenity and landscape concerns can be taken into account at the detailed planning application stage, supported if necessary by an ES, TA and other relevant evaluation studies which would identify design constraints and appropriate mitigation. Overall the identification of Mercers Farm is properly justified and likely to be delivered in the expected timescale.
74. The plan identifies a preferred area at Oxted Sandpit (**preferred area Q**) which is a small extension in the north west corner to the south of Duckpit Wood that would otherwise be sterilised. The sandpit ceased production in 1997 and still awaits restoration. It is now owned by a waste company but

the necessary environmental permit for infilling was refused by the EA in November 2010 because of concerns about the impact on local users of Barrow Green Road from vehicles using the site in combination with the traffic using Barrow Green Road to access the Oxted Quarry landfill (the Chalkpit). With HGV traffic to the Chalkpit, there are already considerable pressures on the local highway network, acknowledged in the 2008 report [CD118] which recommended improvement works to Chalkpit Lane and Barrow Green Road, and there is substantial local opposition to the introduction of any more HGV traffic to the area. Traffic associated with the extension to the sandpit as well as the permitted infill operations and potential aggregate recycling facility could add further to the environmental and highway problems in Barrow Green Road and in Oxted.

75. The current permission restricts the number of HGV movements per weekday to 110 and the assumption has been made by the CC that those generated by the mineral extraction would contribute to that limit. Access to the sandpit is around 350m north of the roundabout on the A25 and physical constraints at the entrance could be required by planning condition to ensure that vehicles to or from the site have to use the southern section of Barrow Green Road. This however would not stop vehicles coming from the north travelling past the sandpit and on to the roundabout to return up Barrow Green Road to the site and the CC's suggestion that drivers would prefer to use the A25, whatever direction they came from, was not the experience of local people. Further routing restrictions could be imposed by way of a planning obligation, although questions were asked as to how they would be enforceable on third parties delivering material for fill or recycling. Evidence from the EA was that prior to refusing the environmental permit the owner was asked about routing but made no response.
76. Neither restriction would however avoid the possibility of laden HGVs leaving the sandpit having to pass others travelling north up the lane to either the sandpit or to the Chalkpit. Bends in the road are inadequate in width for two HGVs to pass and the CC conceded that widening might be required. There is also the potential for conflicts between HGVs, whether travelling to the Chalkpit or to and from the sandpit, and cyclists and horseriders. Barrow Green Road is part of the Surrey Cycle Network, although there is no dedicated cycle path and cyclists have to share the carriageway. Horses from the riding and livery stables north of the sandpit also use the lane and have to pass the sandpit entrance to reach the bridleway to the south.
77. A project transport assessment at application stage would be required to take account of the total volume of traffic movements connected with the preferred area and the restoration operations on the existing sandpit as well as other traffic on Barrow Green Road. However it appears that at the plan preparation stage neither the strategic transport assessment [CD16], the PALAR [CD22] or the assessment of potential aggregate recycling sites [CD75] considered the cumulative impacts in terms of HGV traffic generated by the Chalkpit as well as the impact of the landfill and aggregates recycling, also anticipated in the CS, and the environmental/amenity impact of HGV traffic.
78. It was argued that the inclusion of preferred area Q provides flexibility and evidence to the hearing was that the owner would extract the sand, whatever the quantity. However in addition to the preferred area at Mercers Farm,

there are existing permitted reserves at 6 sites in the county [2008 AMR CD28]. The likely yield is disputed depending on how the site would be worked and restored, but whether 0.21mt (as estimated in CD21) or 0.05mt (as assessed by the residents group's consultants), the preferred area would contribute less than half of the county's soft sand annual production and only make a small contribution to total provision adding little to the plan's flexibility.

79. A preferred area is one of known resources where planning permission might reasonably be anticipated subject to the usual tests of environmental acceptability. There are known resources here which would be sterilised if they are not worked before infilling is completed on the main part of the sandpit. However there are significant concerns about the environmental acceptability of traffic movements on Barrow Green Road, a lack of evidence that cumulative transport impacts were considered as part of the plan preparation process and doubts as to whether the adverse impacts are capable of mitigation by the imposition of appropriate conditions or by undertakings being given. Although an application for a further renewal has been made, planning permission to infill the pit currently expires in May 2011. The infill operation remains uncertain with the refusal of the environmental permit. The CC contended that the EA's objection was not one of principle. However having regard to the reason for refusing the permit, the EA would have to be satisfied that the traffic concerns were capable of being overcome, the difficulties of which have been outlined above. If these could be overcome, the site could potentially be brought forward under policy MC11. However as it stands the identification of the Oxted Sandpit extension as a preferred area is not sound and it is recommended that it be deleted (**IC2**).
80. Subject to the above recommendation, the proposal in the PADPD for soft sand is justified, effective and consistent with national policy and is sound.

Issue 3 – Whether there are other sites that represent a better choice than the identified preferred areas.

81. The conclusion set out earlier in this report is that the supply policy of the DPD accords with the CS and that the identified sites are deliverable and would provide the level of mineral resources required, the shortfall in concreting aggregates being manageable. The plan is sound in this regard and there is no need to look further for any additional sites in the plan period unless it can be shown that there are alternative sites that would perform better than those identified. For the reasons set out below, none of the alternative sites are considered to meet this test and all have drawbacks.
82. The two areas adjoining the existing workings at **Hengrove Farm** were not identified as PMZs during the early stage of the plan making process. Permission was granted for the eastern site in 2009 and it will be included in the next AMR as a permitted reserve. Although there may be disagreement between the Council and the operator on various legal points in relation to that permission, this does not justify, on the grounds of providing certainty, the site's inclusion in the PADPD. Shortwood Common to the west has not been subject to SA or public consultation. There have been some early investigations but there remain outstanding issues in relation to the allotments and the impact on the SNCI. There is insufficient evidence to identify the site as a preferred area. If an application is made it would fall to be considered

against CS policy MC11 as an extension to an existing site that would otherwise be sterilised.

83. Vicarage Farm, Trumps Farm and Eashing Farm were all identified as PMZs and have been subject to SA/SEA [CD80] and public consultation. **Eashing Farm** was identified as a preferred area in the 2006 Preferred Options but excluded from the PADPD in order to safeguard land within the Area of Great Landscape Value (AGLV) in advance of the AONB review (a matter addressed in the CS report). There is sustained public objection to the site and there is no longer any operator interest, thus raising a question over deliverability. At the hearing, the local community sought the inclusion in the plan of additional reasons why the site was unsuitable which were not accepted by the Council. As none go to the soundness of the plan, no change is recommended.
84. **Vicarage Farm**, to the north of Halliford Road, has no suitable direct access and would be worked with preferred area L. The site is visibly very exposed to nearby residential properties and was included as a Category 2 site (not to be worked) in the 1993 Minerals Local Plan. It could only be brought forward after extensive advance planning for working towards the end of the plan period as an extension to Watersplash Farm and issues around the transfer of the extracted material and final restoration remain unresolved. If Vicarage Farm is not allocated in the PADPD, around 0.75mt of sand and gravel would be sterilised. However given the conclusion about the adequacy of the supply, there is insufficient evidence to demonstrate that Vicarage Farm would perform better than the identified preferred areas or that the plan is unsound without its inclusion.
85. **Trumps/Hersham Farm** would be worked for low grade sand for use as bulk fill. In the past, up to 10% of production of soft sand may have been used for such purposes (CD1 #5.33). However demand is variable and has the potential to be met by alternative low grade recycled products, if available. Given the uncertainty of information about the quality and quantity of the resource, its likely local, low cost and small scale market, and the general shortage of inert fill for restoration, there is not enough robust and credible evidence to justify bringing forward this site as an identified preferred area.

Issue 4 – Whether the PADPD is sound in terms of its approach to monitoring and the need for flexibility.

86. The PADPD contains a monitoring framework, including targets that are linked to indicators in the Council's AMR. The AMR will play a key role in assessing the performance and effectiveness of the plan. The Council has proposed a new Table 5 (**PC15**) to be consistent with the CS which includes triggers or prompts for consideration of remedial action. Although it does not identify what that remedial action might be, the notes refer to the AMR including a commentary on implementation of the PADPD as well as the CS.
87. If circumstances change there is sufficient flexibility so that the Council could, for example, bring forward sites planned for the later part of the plan period or reconsider other PMZs assessed in the PALAR. Overall, with the change proposed, there is enough evidence to conclude that the PADPD is sufficiently flexible and capable of satisfactory monitoring and is likely to be effective. In this respect, it is sound.

Legal Requirements

88. My examination of the compliance of the PADPD with the legal requirements is summarised in the table below. I conclude that the PADPD meets them all.

LEGAL REQUIREMENTS	
Minerals and Waste Development Scheme (MWDS)	The PADPD is identified within the approved MWDS December 2008 which sets out an expected adoption date of November 2010, based on a submission date in February 2010. The PADPD was instead submitted in June 2010, the GOSE confirming that it was not necessary to change the MWDS at that stage. The PADPD's content and timing are generally compliant with the MWDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed changes (PC).
Sustainability Appraisal (SA)	SA has been carried out at all stages during the preparation of the PADPD. Consideration has been given in the Core Strategy report under the issues of legal compliance to detailed criticisms of the sustainability appraisal. For the reasons given there, it is considered to be adequate.
Appropriate Assessment (AA)	As concluded in the report on the Core Strategy, the Habitats Regulation Assessment and Appropriate Assessment (November 2009) has been carried out in consultation with Natural England and the conclusions of the Appropriate Assessment are in accordance with the advice and recommendations of NE. Possible effects on SPAs, SACs and Ramsar sites located within Surrey and lying within 10km of the county boundary have been taken into account and the assessment is of no significant impact but Appropriate Assessment may be necessary at the planning application stage.
National Policy	The PADPD complies with national policy except where indicated and changes to resolve non-compliance are recommended.
Regional Policy	The PADPD is in general conformity with the South East Plan, as proposed to be changed by the Secretary of State's Proposed Changes to Policy M3 of March 2010.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The PADPD complies with the Act and the Regulations.

Overall Conclusion and Recommendation

89. I conclude that with the changes proposed by the Council that I accept, set out in Appendix A, and the changes that I recommend, set out in Appendix C, the Primary Aggregates DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.

Mary O'Rourke

Inspector

This report is accompanied by:

Appendix A (separate document) Council Changes that go to soundness

Appendix B (separate document) Council's Minor Changes

Appendix C (attached) Changes that the Inspector considers are needed to make the plan sound

Surrey Minerals Plan : Primary Aggregates DPD

Appendix A – Council’s Changes that go to soundness

Preface

Ref	Section	Proposed change
PA/PC/1	Superseded policies	Delete list of superseded policies and include as new Appendix 2

Contents page

PA/PC/2	New Appendix 2	Add new Appendix - Relationship between ‘saved’ policies of the Surrey Minerals Local Plan 1993 and the Surrey Minerals Plan Primary Aggregates DPD
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3. Vision and objectives

PA/PC/3	Objective O4.3	Delete comma between ‘sites’ and ‘and’ Delete ‘conserving’ between ‘and’ and ‘sites’
PA/PC/12	Objective O6.2	Insert ‘, consistent with Green Belt policy and objectives, and’ after ‘way’ in line 1

5. Regional guidance on primary aggregates

PA/PC/4	Paras 5.3-5.4	Delete both paragraphs and replace with ‘5.3 The regional aggregate guidelines are apportioned to mineral planning authorities and these are to be taken into account in development plan documents and in determining planning applications. In the south east, the apportionment methodology has been subject to recent review and the results were published as “Proposed Changes” to the then regional policy in March 2010. Subsequent advice issued in July 2010 stated that authorities in the south east should work from the figures in the “Proposed Changes”.’
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6. The provision of primary aggregates in Surrey

PA/PC/5	Para 6.2	Amend paragraph as shown and insert additional sentences ‘6.2 ‘The guideline for Surrey set <u>proposed by the Panel report on the <i>Partial Review of the South East Plan</i></u> is 1.32 <u>1.27</u> mtpa amounting to a total of 21.12 <u>20.32</u> mt for the period 2010-2026. This can be regarded as the minimum to plan for, as it should be increased to take account of the requirement for 2009 of 2.62mt, bringing the requirement to a total of 23.74 <u>22.94</u> mt. <u>The Panel Report recommendations on sub-regional apportionment were confirmed as “Proposed Changes” by the then Secretary of State in March 2010. Subsequent advice issued in July 2010 stated that authorities in the south east should work from the figures in the “Proposed Changes”.</u> ’
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Appendix A – Council’s Changes that go to soundness

PA/PC/13	Para 6.3	Replace ‘23.74’ with ‘22.94’																														
PA/PC/14	Table in Para 6.5	Amend as shown below <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 35%; text-align: center;">LOW (Based on regional figure proposed by <i>Partial-Review</i>) apportionment in “Proposed Changes” (March 2010))</th> <th style="width: 35%; text-align: center;">HIGH (Based on current RSS apportionment of 2.62mtpa)</th> </tr> </thead> <tbody> <tr> <td>Potential guideline</td> <td style="text-align: center;">23.7 <u>22.9</u>mt</td> <td style="text-align: center;">44.5mt</td> </tr> <tr> <td>Permitted reserve</td> <td style="text-align: center;">8.0mt</td> <td style="text-align: center;">8.0mt</td> </tr> <tr> <td>Resources required</td> <td style="text-align: center;">15.7 <u>14.9</u>mt</td> <td style="text-align: center;">36.5mt</td> </tr> </tbody> </table>		LOW (Based on regional figure proposed by <i>Partial-Review</i>) apportionment in “Proposed Changes” (March 2010))	HIGH (Based on current RSS apportionment of 2.62mtpa)	Potential guideline	23.7 <u>22.9</u> mt	44.5mt	Permitted reserve	8.0mt	8.0mt	Resources required	15.7 <u>14.9</u> mt	36.5mt																		
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PA/PC/6	Table in Para 6.8	Delete table and replace with <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 35%; text-align: center;">LOW</th> <th style="width: 35%; text-align: center;">HIGH</th> </tr> </thead> <tbody> <tr> <td>Concreting aggregate</td> <td></td> <td></td> </tr> <tr> <td>Potential guideline</td> <td style="text-align: center;">16.12 <u>15.57</u></td> <td style="text-align: center;">30.26</td> </tr> <tr> <td>Permitted reserve</td> <td style="text-align: center;">2.32</td> <td style="text-align: center;">2.32</td> </tr> <tr> <td>Resources required</td> <td style="text-align: center;">13.80 <u>13.25</u></td> <td style="text-align: center;">27.94</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td>Soft sand</td> <td style="text-align: center;">LOW</td> <td style="text-align: center;">HIGH</td> </tr> <tr> <td>Potential guideline</td> <td style="text-align: center;">7.58 <u>7.33</u></td> <td style="text-align: center;">14.24</td> </tr> <tr> <td>Permitted reserve</td> <td style="text-align: center;">5.68</td> <td style="text-align: center;">5.68</td> </tr> <tr> <td>Resources required</td> <td style="text-align: center;">1.90 <u>1.65</u></td> <td style="text-align: center;">8.56</td> </tr> </tbody> </table>		LOW	HIGH	Concreting aggregate			Potential guideline	16.12 <u>15.57</u>	30.26	Permitted reserve	2.32	2.32	Resources required	13.80 <u>13.25</u>	27.94				Soft sand	LOW	HIGH	Potential guideline	7.58 <u>7.33</u>	14.24	Permitted reserve	5.68	5.68	Resources required	1.90 <u>1.65</u>	8.56
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PA/PC/7	Para 6.10	Delete ‘15.7’ and replace with ‘14.9’ in second sentence.																														
PA/PC/8	Para 6.10	Delete third, fourth and fifth sentences in their entirety																														
PA/PC/9	Para 6.11	Delete existing text and replace with <u>‘The preferred areas represent the extent of the resource that has been identified as suitable to contribute to regional aggregates supply. Overall they provide a potential aggregates resource of 15.96mt compared with a requirement of 14.9mt under the low scenario. Separate provision should be made for soft sand and for sharp sand and gravel resources where appropriate. The land assessment</u>																														

Appendix A – Council’s Changes that go to soundness

		work undertaken for the plan indicates that available resources for concreting aggregate are becoming increasingly difficult to identify. The likely outcome is that identified potential reserves of concreting aggregate will be almost fully exploited before 2026 even under the low scenarios given above. <u>The potential resource identified in Table 3 of 13.05mt compares with the estimated requirement of 13.25mt in Table 2. Additional resources occur within Preferred Area E and a modest change in production at this site could cover this gap.</u>
PA/PC/10	New Para 6.12	Insert new paragraph '6.12— Comparison of Tables 2 and 4 indicates that there should be a potential surplus of soft sand resources available to meet requirements in the plan period. However, the likely exhaustion of permitted reserves elsewhere in the county during the plan period means that soft sand production from the identified preferred areas will be required. Soft sand production will continue to contribute to the regional aggregate requirements beyond the plan period given the reserves that will remain at 2026, but precise amounts would depend on market conditions and the capability of individual workings in production terms, matters over which the authority has limited control.'
PA/PC/11	Para 6.13 (re-numbered Para 6.14)	Add new second and third sentence: 'Table 1 indicates that at the end of 2008 permitted reserves amounted to some 8mt comprising 2.32mt of concreting aggregate and 5.68mt of soft sand. The landbank for concreting aggregate of some 2.7 years is well below the guideline, but for soft sand is almost 14 years.'

8. Implementation and monitoring

PA/PC/15	Table 3: Monitoring framework for primary aggregate policies	Replace existing Table 3 by new Table renumbered 5 (see pages 5/6 of this schedule)
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Appendices

PA/PC/2	New Appendix 2	Insert Appendix 2 (see page 7 of this schedule)
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Surrey Minerals Plan : Primary Aggregates DPD

Appendix A – Council’s Changes that go to soundness

Table 5: Monitoring framework for primary aggregates policies

Policy reference	Nature of Target	Type of Indicator	Indicator	Data source	Prompts for consideration of remedial action
MA1 <u>Aggregate supply</u>	Maintaining supply of aggregate minerals and adequate landbanks	Contextual <u>Output/ Outcome</u>	Annual production of concreting aggregate and soft sand <u>Landbank of permitted reserves for primary aggregates (Target to maintain at least seven year landbank)</u>	Surrey CC & mineral operators	<u>Failure to reach a seven year landbank within two years of adoption of the Primary Aggregates DPD and thereafter to maintain at least a seven year landbank for two or more years</u>
MA2 <u>Preferred areas for concreting aggregate</u>	<u>Delivery of preferred areas fro concreting aggregate extraction</u>	Output	Number of <u>planning permissions granted for preferred areas and permitted reserves at year end</u>	Surrey CC	<u>See under MC7 and MA1</u>
MA3 <u>Preferred areas for soft sand</u>	<u>Delivery of preferred areas for soft sand extraction</u>	Output	Number of <u>planning permissions granted for preferred areas and permitted reserves at year end</u>	Surrey CC	<u>See under MC7 and MA1</u>

Appendix A – Council’s Changes that go to soundness

Notes

Types of indicator

Process indicators have been identified where the plan specifies other process-related activities that are required such as the preparation of other planning documents.

Contextual indicators provide a backcloth against which to consider the effects of policies and inform the interpretation of output indicators.

Output/outcome indicators measure the performance of policies in terms of their quantified results. They cover direct planning outputs of the implementation of the policies, along with any outcomes of relevance to wider considerations.

Remedial Action

Remedial action has been identified only where issues that relate to the strategy of the plan as a whole are raised. These issues will also be relevant to the monitoring of the Core Strategy DPD and there will be a degree of overlap between the two. The Annual Monitoring Report will include a commentary on implementation of both of the plans.

Database

The number of planning applications determined by the mineral planning authority each year will form the basic source of most monitoring information. Decisions made on appeal will also be monitored.

Surrey Minerals Plan : Primary Aggregates DPD

Appendix A – Council’s Changes that go to soundness

APPENDIX 2

Relationship between ‘saved’ policies of the Surrey Minerals Local Plan 1993 and the Surrey Minerals Plan Primary Aggregates DPD

Minerals Local Plan 1993 Policy	Replacement Primary Aggregates DPD Policy
1	
2	
5	
6	
7	
10	MA2
12	MA3
15	
16	
17	
18	
19	
21	
22	
23	
24	
25	
26	
27	
28	

Surrey Minerals Plan : Primary Aggregates DPD

Appendix B - List of suggested minor changes submitted by Surrey County Council

1. Introduction

Ref	Section	Suggested minor changes
PA/SMC/36	Para1.2	First sentence: Delete 2010-2026 and replace by 2009-2026; second sentence delete 'also'

3. Vision and objectives

PA/SMC/1	Objective O4.1	First sentence: Insert space between words 'development' and 'that'
PA/SMC/2	Objective O5.1	Delete 'preferred' before 'areas' and insert 'for future mineral development' after 'areas'

4. National Policy on Primary Aggregates

PA/SMC/3	Para 4.3	Second sentence delete 'is to be applied to the latest national guidelines' and replace by 'was subject to independent examination in October 2009 and "Proposed Changes" were published by the Secretary of State in March 2010.'; delete third sentence and replace by 'The "Proposed Changes" reduce the regional total for the south east included in the June 2009 guidelines from 12.18mtpa to 11.12mtpa.'
PA/SMC/4	Para 4.4	Delete paragraph in its entirety

5. Regional guidance on primary aggregates

PA/SMC/5	Title and sub-heading	Delete title and replace by 'Aggregates in the South East' and delete sub-heading and replace by ' Provision for aggregates in the south east'
PA/SMC/6	Paras 5.5-5.9	Re-number as paragraphs 5.4-5.8
PA/SMC/7	Para 5.5 (re-numbered Para 5.4)	Merge the first two sentences by deletion of 'The <i>Partial Review</i> proposes that' at the start of the first sentence and 'This is not a change in policy and reflects' at the start of the second sentence and insertion of 'as reflected in' before 'the guidance'
PA/SMC/8	Para 5.6 (re-numbered Para 5.5)	Delete 'to' before 'be' in line 1

6. The provision of primary aggregates in Surrey

PA/SMC/34	Para 6.4	Replace '10.26' by '10.28'
PA/SMC/35	Para 6.5	Delete 'the table' and insert 'Table1' and insert title for table to read 'Table 1 – Estimated resource requirement'

Surrey Minerals Plan : Primary Aggregates DPD

Appendix B - List of suggested minor changes submitted by Surrey County Council

PA/SMC/11	Para 6.8	Second sentence: Insert 'in Table 2' between 'shown' and 'below'.
PA/SMC/12	Para 6.8	Insert title above table: 'Table 2 - Estimated resource requirement by type (million tonnes)'
PA/SMC/13	Para 6.9	First sentence: Delete 'Tables 1 and 2' in line 2 and replace with 'Tables 3 and 4' and re-number the Tables that follow paragraph 6.10 accordingly
PA/SMC/14	Para 6.9	Last sentence – amend as follows: ' <u>If preferred areas E and P will are given consent, then they may continue to be worked beyond 2026, and an estimate has been made of likely production from these areas within the plan period.</u> '
PA/SMC/15	Para 6.12 – 6.14	Re-number as paragraph 6.13 – 6.15
PA/SMC/16	Para 6.14 (re-numbered Para 6.15)	Second sentence – amend as follows: ' <u>The landbank position will therefore be kept under review in the Annual Monitoring Report but it will be for the industry to determine when it brings forward applications to address any shortfall.</u> '
PA/SMC/17	Policy MA1 – Aggregate requirements	Title: replace 'requirements' with 'supply'
PA/SMC/18	Policy MA1 – Aggregate requirements	Insert spaces between '24' and 'million' and '15' and 'million' and '9' and 'million'

7. Preferred areas for sand and gravel extraction

PA/SMC/19	Para 7.3	First sentence: insert new footnote after 'assessed': 'Report on Potential Mineral Zones (PMZ Report) (SCC) 2004'
PA/SMC/20	Para 7.5	Amend footnote on MPS1 Good Practice Guide: Replace 'paragraph 23' by 'paragraph 28'
PA/SMC/21	Para 7.5	Last sentence: insert new footnote after ' <i>Environmental Report</i> ': 'Strategic Environmental Assessment and Sustainability Appraisal (SCC) November 2009'

8. Implementation and monitoring

PA/SMC/22	Para 8.2	Delete 'or the RSS' from the first bullet point
PA/SMC/23	Table 1 Policy MA1	Delete content of second row headed Regional policies and replace by 'National policies' in first column and 'MPS1' in second

Surrey Minerals Plan : Primary Aggregates DPD

Appendix B - List of suggested minor changes submitted by Surrey County Council

		column
PA/SMC/24	Table 1 Policy MA2	Delete content of second row headed Regional policies and replace by 'National policies' in first column and 'PPS1, PPS5, PPS7, PPS9, PPS12, PPS23, PPS24, PPS25, PPG2, PPG13, PPG24, MPS1, MPS2, MPG2, MPG5, MPG7' in second column
PA/SMC/25	Table 1 Policy MA2	Delete content of second row headed Regional policies and replace by 'National policies' in first column and 'PPS1, PPS5, PPS7, PPS9, PPS12, PPS23, PPS24, PPS25, PPG2, PPG13, PPG24, MPS1, MPS2, MPG2, MPG5, MPG7' in second column

Appendix 1

PA/SMC/26	Preferred areas A, C, D, E, F, G, H, I, J, K, L, P and Q	Key development requirements – Hydrology amend last clause to read: ' '; attention is drawn to the guidance in Section 8 of the SFRA and the PPS25 practice guide and applicants will be expected to draw on this guidance in preparing the project level flood risk assessment required, covering all sources of flood risk, including a surface water drainage strategy covering the operational and post restoration phases of development'
PA/SMC/37	Preferred area A: Addlestone Quarry extension	Area: delete 14ha and insert 18.5ha
PA/SMC/27	Preferred Area C: Hamm Court Farm	Plan title: Replace 'Chertsey' by 'Weybridge'
PA/SMC/28	Preferred Area C: Hamm Court Farm	Location: Replace 'north' by 'south'
PA/SMC/38	Preferred area C: Hamm Court Farm	Key development requirements - Hydrology: delete 'source protection zone 3 for public water supply (Chertsey)' and insert 'major aquifer' in first clause
PA/SMC/29	Preferred Area C: Hamm Court Farm,	Key development requirements - Infrastructure: Add 'and EDF Energy' after 'Grid' and before 'infrastructure'
PA/SMC/30	Preferred Area D: Milton Park Farm and Preferred Area E: Whitehall Farm	Key development requirements – Hydrology, second sentence: Delete full stop between '0.5km' and 'so'.

Surrey Minerals Plan : Primary Aggregates DPD

Appendix B - List of suggested minor changes submitted by Surrey County Council

	Document & section	Amendment	Reason
PA/SMC/47	Preferred area E: Whitehall Farm	Revise Area: from 44ha to 47.1ha	Reflection of change in boundary
PA/SMC/39	Preferred area E: Whitehall Farm	Key development requirements – Access: delete ‘to avoid level crossings’ from line 3	Factual correction
PA/SMC/40	Preferred area F: Home Farm extension	Key development requirements – Biodiversity: insert ‘record of’ before ‘protected species’ in line 4 and delete final clause ‘area should....protection area’ in its entirety	Typographical error and to reflect findings of report on Habitats Regulation Assessment
PA/SMC/41	Preferred area G: Homers Farm	Key development requirements – Hydrology: insert ‘/Site of Nature Conservation Importance’ after ‘Site of Metropolitan Importance’	Factual correction
PA/SMC/42	Preferred Area H: King George VI Reservoir, Stanwell	Key development requirements – Biodiversity: insert ‘on the method and programming of working’ after ‘information’ in line 3 and delete ‘when details of the method and programming of working can be assessed’ in lines 4/5 add additional clause to read ‘area also lies within Staines Moor SSSI and potential impacts on interests for which the SSSI was designated should be assessed’	Clarification of information requirements To ensure that full range of ecological interests are addressed
PA/SMC/31	Preferred Area H: King George VI Reservoir, Stanwell	Key development requirements - Restoration: Amend as follows: <u>‘main site will continue as an operational reservoir; restoration of the wider Hithermoor site permitted under SP/03/1212 should be implemented without delay save for the final restoration along the conveyor route and of the processing plant and associated silt lagoon areas, final restoration of which should be assimilated into the wider scheme as soon as working</u>	To promote early restoration of the Hithermoor area save that of the final restoration of areas likely to be affected by the working of the reservoir (Spelthorne BC)

Surrey Minerals Plan : Primary Aggregates DPD

Appendix B - List of suggested minor changes submitted by Surrey County Council

		<u>of the reservoir ceases</u>	
PA/SMC/43	Preferred area I: Land north of Thorpe (Muckhatch Lane)	Key development requirements – Access: amend wording to read ‘new access required from Thorpe bypass, <u>or from the roundabout on Ten Acre Lane or the roundabout at their junction</u> ’	Clarification
PA/SMC/44	Preferred area J: Manor Farm	Key development requirements – amend following Local amenity: correct spelling of dust in line three Heritage: combine final two clauses to read ‘within an area of high archaeological potential <u>so</u> prior archaeological assessment and evaluation <u>required undertaken in late 2008 and results awaited</u> ’ Restoration: amend wording to read ‘ <u>lack of suitable access for HGVs for the importation of inert fill proximity of residential properties and enclosed nature restricts opportunities to restore the entire area to existing levels; so create areas of open space and open water unless a feasible and acceptable method of importation of fill can be found, enabling an alternative restoration option to be considered</u> ’	Typographical error; Updating to reflect completion of initial surveys; Clarification that access limitations dictate restoration options unless importation of fill other than by HGVs is feasible
PA/SMC/45	Preferred area K: Queen Mary Reservoir	Site Address, Plan title and Policy MA2 – insert ‘Ashford’ in place of ‘Addlestone’, ‘Sunbury’ and ‘Laleham’ respectively	Correction to location reference
PA/SMC/32	Preferred area P: Mercers Farm	Location: Replace word ‘east’ by ‘west’	Correction of typing error
PA/SMC/46	Preferred area P: Mercers Farm	Key development requirements – Hydrology: amend initial clause to read ‘within a major aquifer <u>within and close to</u> source protection zone <u>2 3</u> for public water supply (Warwick Wold) <u>and Brewer Street) to the east</u> ’	Updating of evidence base (Environment Agency)
PA/SMC/33	Preferred area Q: Oxted Sandpit Extension	Local amenity: Replace word ‘Hall’ by ‘Hill’	Correction of typing error

Appendix C – Changes that the Inspector considers are needed to make the plan sound

These changes are required in order to make the Primary Aggregates DPD sound.

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	Policy MA2, Table 3, Appendix 1 page 22 and pages 47-49 and the contents page	Delete preferred area I from policy MA2, from Appendix 1 and Table 3, make consequential changes to the total figure in Table 3 and to the contents page.
IC2	Policy MA3, Table 4, Appendix 1 page 22 and pages 65-66 and the contents page	Delete preferred area Q from policy MA3, from Appendix 1 and Table 4, make consequential changes to the total figure in Table 4 and to the contents page.
IC3	Table 4	Delete the last row and replace the first column with 'TOTAL TABLES 3 & 4' and the second column with '15.42'
IC4	Paragraph 6.10	Delete existing text and replace with 'The estimated production available from the preferred areas is 12.72mt of concreting aggregates and 2.70mt of soft sand. This means that the proposals in the plan are likely to supply 15.42mt compared to the low scenario requirements of 14.9mt.' Delete third, fourth and fifth sentences in their entirety.
IC5	Paragraph 6.11	Delete existing text and replace with 'The preferred areas represent the extent of the resource that has been identified as suitable to contribute to regional aggregates supply. Overall they provide a potential aggregates resource of 15.42mt compared with a requirement of 14.9mt under the low scenario. Separate provision should be made

		<p>for soft sand and for sharp sand and gravel resources where appropriate. The land assessment work undertaken for the plan indicates that available resources for concreting aggregate are becoming increasingly difficult to identify. The likely outcome is that identified potential reserves of concreting aggregate will be almost fully exploited before 2026 even under the low scenarios given above. The potential resource identified in Table 3 of 12.72mt compares with the estimated requirement of 13.25mt in Table 2. Additional resources occur within Preferred Area E and a modest change in production at this site could cover this gap.'</p>
<p>IC6</p>	<p>New paragraph 6.12</p>	<p>Insert new paragraph</p> <p>'6.12 Comparison of Tables 2 and 4 indicates that there should be a potential surplus of soft sand resources available to meet requirements in the plan period. However, the likely exhaustion of permitted reserves elsewhere in the county during the plan period means that soft sand production from the identified preferred area will be required. Soft sand production will continue to contribute to the regional aggregate requirements beyond the plan period given the reserves that will remain at 2026, but precise amounts would depend on market conditions and the capability of individual workings in production terms, matters over which the authority has limited control.'</p>