

Planning Supporting Statement

Chambers Runfold PLC

Land at Homefield Sandpit, Guildford Road, Runfold, Surrey

December 2020



Carter Jonas

Regus House, Falcon Drive, Cardiff, CF10 4RU

Carterjonas.co.uk



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Application Forms and Certificates

For amendments to planning applications ref: WA04/1876, WA09/0856 and WA11/0009, WA10/2109, WA10/2108 and WA08/1848 (as amended)

Plans

WA04/1876 (Soils Recycling)

- Site Location Plan HF/SR/1, (1:2000), November 2020
- Indicative Recycling Areas SLC/RECYC/1/Rev A, December 2020

WA09/0856 (Recycling Plant)

- Site Location Plan HF/WP/1, (1:2000), November 2020
- Indicative Recycling Areas SLC/RECYC/1/Rev A, December 2020
- (Approved Plan – Block Plan HMFLDWP/2, December 2008)

WA11/0009 (Workshop)

- Site Location Plan HF/WKS/1, (1:2000), November 2020
- Site Plan HF/WKS/2, (1:500), November 2020

WA10/2109 (Workshop Extension)

- Site Plan HF/WKS/Ext/2, (1:2000), November 2020
- Site Location Plan HF/WKS/Ext/1, (1:500), November 2020

WA10/2108 (Lorry Parking)

- Site Location Plan HF/LP/1, (1:2000), November 2020
- Site Plan HF/LP/2, (1:500), November 2020

WA08/1848 (Storage Bays)**Approved Plans**

- Site Plan HMFLD/SB1/A, August 2008
- Plan HMFLD/SB2, July 2008

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1.0 INTRODUCTION

Site: Land at Homefield Sandpit, Guildford Road, Runfold, Surrey

Applicant: Chambers Runfold PLC

Proposals: Soils Recycling

Continued use of the land for the recycling, storage and export of soils from imported inert waste and recovery of concrete, hardcore and tarmacadam for export and processing off site without compliance with conditions 1, 3 and 6 of planning permission ref: WA04/1876 dated 4 April 2005.

Recycling Plant

Continued use of approximately 1.54 hectares of land for the screening and washing of inert waste, comprising power screen, washing plant, filter press building, associated tanks and equipment, conveyors and stockpile areas, underground ducting, storage bays and associated hardstanding areas without compliance with conditions 1, 2 and 4 of planning permission ref: WA09/0856 dated 16 October 2009.

Workshop

Continued use of workshop for use in repairing onsite plant, machinery and lorries without compliance with conditions 1 and 2 of planning permission ref: WA11/0009 dated 7 April 2011 (as amended by planning application ref: WA/2020/1753 dated 11 December 2020).

Workshop Extension

Continued use of two storey extension to side of workshop to provide welfare facilities without compliance with conditions 1 and 2 of planning permission ref: WA10/2109 dated 17 February 2011 (as amended by planning application ref: WA/2020/1754 dated 14 December 2020).

Overnight Lorry Parking

Continued temporary use of the land for the overnight parking of up to 8 vehicles without compliance with conditions 1 and 2 of planning permission

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ref: WA10/2108 dated 16 February 2011 (as amended by planning application ref: WA/2020/1755 dated 14 December 2020).

Storage Bays

Retention of storage bays for the storage of imported limestone scalplings; and retention of a wheelwash facility and wheel spinner without compliance with conditions 1 and 3 of planning permission ref: WA08/1848 dated 20 February 2009 (as amended by planning application ref: WA/2020/1751 dated 14 December 2020).

Substitute Plans: Details are provided in Section 5 of this Planning Statement

The Site

- 1.1 Homefield Sandpit hereafter known as 'Homefield', is situated to the south of Seale Lane and Guildford Road, and west of Blighton Lane, Runfold approximately 4km east of Farnham town centre.
- 1.2 Homefield has planning permission for mineral working, but as the sand reserves are now exhausted extraction has ceased. The site operates as an inert waste recycling facility and is undergoing restoration to agriculture through infilling with imported materials. The whole site is to be restored by 22 February 2042.
- 1.3 On behalf of the applicant Chambers Runfold PLC, six planning applications have been submitted to Surrey County Council (SCC) pursuant to section 73 of the Town and Country Planning Act ('s73 applications'). They seek to extend the end date of permissions for the existing workshop/workshop extension, overnight lorry parking, storage bays for limestone scalplings, soils recycling and recycling plant and to amend associated planning conditions.
- 1.4 This overarching Planning Supporting Statement relates to the six 's73 applications.'

The Applicant

- 1.5 Chambers Runfold PLC is part of the Chambers Group, an integrated recycling, waste management and aggregates business, servicing a wide range of commercial and domestic customers. The group comprises Chambers Waste Management PLC which was established in 1969 and Chambers Runfold PLC. Both companies are privately owned.

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- 1.6 The Group has invested heavily in equipment at its bases in Slyfield, Aldershot and Homefield to improve the range and quality of services. The industry-leading materials recovery facility (MRF) at Slyfield Industrial Estate, Guildford receives a range of local commercial, industrial and construction wastes and 98% of the materials coming into the site are recovered and recycled.
- 1.7 Homefield is a former sandpit and long-established inert landfill, which benefits from top-of-the-range recycling facilities, enabling the Applicant to produce secondary washed aggregates to a range of sizes and specifications, including a construction sand
- 1.8 The Applicant has been operating the inert landfill site at Homefield since 1985 and recycling operations at Slyfield and Hollybush Lane (Aldershot) since 1992 and 1994 respectively.

2.0 STATUTORY BACKGROUND

Pre-Application

- 2.1 SCC Planning provided written advice to the Applicant following discussion of the proposals during a site visit held on 4th November 2020.

Environmental Impact Assessment

- 2.2 Part 1, Paragraph 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regs) (as amended) defines EIA Development as that which is:
 - (a) Schedule 1 development; or
 - (b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

Previous EIA Screening of Existing Activities

- 2.3 SCC did not deem the planning applications for the extant permissions for the workshop and extension, lorry parking, storage bays, washing¹, screening and recycling² of inert waste, to be 'EIA Development.'
- 2.4 These developments sit alongside permission for the ongoing progressive restoration with inert material of the void which remains following the recent cessation of mineral extraction. The

¹ SCC Committee Report, Item 9, dated 14 October 2009 for Planning Application Ref WA09/0856

² SCC Screening Opinion for Planning Application Ref WA04/1876 - recycling, storage and export of soils from imported inert waste and the recovery of concrete hardcore and tarmacadam for export and processing off-site, dated 29 September 2004

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restoration is subject of a separate application for ‘determination of conditions under the periodic review of minerals permission (ROMP)³. SCC issued a Screening Opinion, dated 19 March 2020 confirming that the ROMP proposals do not constitute ‘EIA Development’

Current Proposals for Development of the Site

Consideration against Schedule 1 of the EIA Regulations

- 2.5 These proposals do not relate to any of the forms of development listed in Schedule 1 of the EIA Regulations.

Consideration against Schedule 2 of the EIA Regulations

- 2.6 These proposals falls into Schedule 2 Paragraph 11(b) of the EIA Regs “*Installations for the disposal of waste (unless included in Schedule 1).*”
- 2.7 The screening criteria given in Schedule 2 of the EIA Regs for Paragraph 11(b) development, include: “*(i) The disposal is by incineration; (ii) The area of the development exceeds 0.5 hectares; or (iii) The installation is to be sited within 100 metres of any controlled waters.*”
- 2.8 The development to which the proposal relates would involve the continuation of waste management activities within an area which exceeds threshold defined in 1(b) (ii) above and therefore is subject to screening by SCC.
- 2.9 The Annex (paragraph 058, Reference ID: 4-058-20150326) to the national Planning Practice Guidance (nPPG) on EIA advises that the following indicative criteria and thresholds should be taken account of when considering whether EIA is required in respect of developments of the types listed in Schedule 2, paragraph 11(b):

“Installations (including landfill sites) for the deposit, recovery &/or disposal of household, industrial &/or commercial wastes where new capacity is created to hold more than 50,000 tonnes per year, or to hold waste on a site of 10 hectares or more. Sites taking smaller quantities of these wastes, sites seeking only to accept inert wastes (demolition rubble, etc.) or Civic Amenity sites, are unlikely to require EIA.”

³ Application for determination of conditions under the periodic review of minerals and mining sites as required by the Environment Act 1995, with reference to planning permission WA97/1204 and GU97/1106 (Appeal Decision dated 5 December 2000), WA/02/0445 and GU02/490 and WA2014/1591 and GU14/P/01630.

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- 2.10 These proposals do not seek to create any additional capacity beyond the limits defined in the Environmental Permits for the site, but rather to allow for the ongoing management of inert waste for a further ten years alongside the restoration of the mineral void.
- 2.11 The Permits allow importation of up to 450,000 tonnes per annum (tpa) of inert waste material into Homefield for the combined screening, recycling and landfilling (restoration) activities. Whilst, business has inevitably been affected during the current pandemic, it is anticipated that the actual total importation will continue to be nearer 180,000tpa which is consistent with the rates over recent years and pre 'Covid-19'.
- 2.12 The SCC Screening Opinion for the ROMP application considered the potential effects of landfilling across the entire Homefield site. Given the site's geographical separation from the closest statutory nature conservation and heritage designations, SCC concluded that ongoing landfill operations would not give rise to adverse impacts on those areas. This applies equally in respect of the temporary retention of the workshop/workshop extension, lorry parking, storage bays, and continuation of recycling activities which are located within the same site boundary.
- 2.13 These developments first took place when Homefield Sandpit and other nearby active mineral workings were undergoing restoration with inert waste materials. These included: Farnham Quarry (Hanson Aggregates) to the north of the A31, now restored and formally opened as a Nature Conservation Reserve in 2018/19 and Runfold South Quarry, formerly known as Princess Royal Sandpit (SITA UK Ltd/Red Materials Ltd) to the west of Homefield which is to be restored by end December 2021. Alton Road Sandpit (Earthline) is located further west of Homefield, beyond Farnham. It remains active as a mineral working and non-hazardous landfill with permission until end 2029.
- 2.14 There are conditions attached to the extant permissions at Homefield aimed at protecting the local community and the environment and these relate to the simultaneous undertaking of the full range of extraction and waste management. These conditions should remain adequate to prevent any significant adverse impacts, particularly now that mineral extractions at Homefield has ceased.
- 2.15 Homefield Sandpit, its buildings and activities are well screened from surrounding views but the site is within the boundaries of the Surrey Hills AONB. SCC's Screening Opinion for the ROMP application stated that the proposals involve:

“activities of a type and scale that are not necessarily in keeping with the character and purpose of the AONB designation. The site is occupied by a historic sand quarry and an established inert landfilling operation, with planning permission dating back to 1945, which

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predates the designation of the AONB (designated in 1958). The continued infilling of the void left by past quarrying operations with inert waste is necessary to the ongoing restoration of the former quarry to a condition and use (agriculture) consistent with the character and qualities of the AONB.”

- 2.16 SCC planning policy supports recycling activities at mineral sites where “the nature and duration of the proposed activity is limited to the consented operation and/or restoration of the mineral working.” With temporary extensions of time for the recycling activities, Homefield would sustain its contribution to the achievement of SCC’s recycled and secondary aggregate targets, whilst generating residual waste material for the ongoing progressive restoration of the site within the permitted timeframe of 22 February 2042.
- 2.17 The workshop, lorry parking and storage bays are fundamental and ancillary to the waste restoration activities.
- 2.18 In light of the above and as set out in more detail in this Planning Statement, it is considered that the proposals would not give rise to significant adverse effects either alone or in combination.

3.0 SITE DESCRIPTION

Location and Established Use

- 3.1 Homefield (NGR 487756 147443) is situated to the south of Seal Lane and Guildford Road and west of Blighton Lane, Runfold, approximately 4km east of Farnham town centre.
- 3.2 The site is accessed from the north off Guildford Road (C119), which links to the A31 to the north west.
- 3.3 Homefield has planning permission for mineral working, but as the sand reserves are now exhausted extraction has ceased. The site operates as an inert waste recycling facility and is undergoing restoration to agriculture through infilling with imported materials in accordance with Environment Agency (EA) permitting requirements. The site is to be fully restored by 22 February 2042.
- 3.4 The Applicant imports construction, demolition and excavation (C,D&E) waste into Homefield. Granular waste materials are processed using a washing and screening plant to produce secondary aggregates, including a construction sand. All bituminous materials (e.g road planning), and oversized concrete, are removed from site. Non-recyclable, residual wastes are

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disposed of within the landfill. Recovered soil and “filter cake” from the filter press are used as capping and restoration materials.

- 3.5 Homefield shared a common floor with the adjoining Jolly Farmer Sandpit to the west which has been filled with inert material and apart from the site entrance infrastructure, is restored.

Description

- 3.6 Homefield extends to some 12.8 hectares (ha).
- 3.7 It is located in the Surrey Hills Area of Outstanding Natural Beauty (AONB), Area of Great Landscape Value (AGLV) and the Metropolitan Green Belt.
- 3.8 There are no nature conservation designations of international or European importance close to the site. The nearest nationally important designation is the Moor Park Site of Special Scientific Interest (SSSI), some 1.57km to the south west of Homefield. The closest local designation is the Site of Nature Conservation Importance (SNCI) Binton Lane Road Verge (Part of Farnham Golf Course) which lies approximately 0.62 kilometres to the south east.
- 3.9 There are no heritage assets of national importance close to the site. The nearest Scheduled Monument is the ‘Earthwork on Botany Hill’ (Historic England List ID 1013869) some 1.06 kilometres to the south of the site.
- 3.10 Homefield is underlain by an SPZ designation (SPZ 3 – Total Catchment) and by the Godalming Lower Greensand, a groundwater body that is subject to monitoring and reporting under the Water Framework Directive regime.
- 3.11 The closest residential properties lie approximately 60-70m to the south and north of the recycling area, within 20m of the active inert fill boundary and immediately to the east of the dedicated site access off Guildford Road.
- 3.12 The surrounding area is characterised by land in agricultural, woodland and other countryside uses, interspersed with individual and small groupings of residential properties.

Planning History

- 3.13 The predominant consents for the site were granted in the 1950s. Subsequent to the original permission, SCC has given consent for changes to the minerals working area, built site compound and infill material as listed below.

- 1988 (WA88/0395) Storage of scalpings on site.

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- October 1993 (WA93/1119) revised details for the siting of storage bays immediately to south of the then existing workshop.
- 1994 (GU93/0836) Small eastern (Area 'E') and western (Area 'W') extensions to the site with restoration to woodland.
- 1997 (WA97/1204 and GU97/1106) Review of Minerals Permissions (ROMP) under the Environment Act 1995. Under the ROMP, the whole of the site is to be restored by 2042.
- 2000 (WA00/0711) Temporary overnight parking for up to eight vehicles (further to a number of temporary permissions, granted between 1985-1995).
- 2000 (WA00/0713) Continued use of storage bays for imported limestone scalplings. No more than 150 tonnes of limestone scalplings are to be stored on the site at any one time.
- 2001 (GU01/1114) Extraction of sand from 0.17 ha of land between the above 'E' and 'W' extensions, which is locally known as the 'tennis court' area.
- 2002 (WA02/1329 and GU02/1496) Replacement workshop to accommodate larger machinery brought into use.
- 2003⁴ (WA02/0445 and GU02/0490) Revised restoration scheme for the site, which extended over the whole sand pit, providing for contours to enhance natural drainage. The scheme included the construction of a drainage channel along the southern, eastern and northern boundaries of the site to deal with any water flowing from adjoining land to the west. A phasing scheme for the landfill operation was also approved, which also included noise mitigation measures.
- 2005 (WA04/1876) Recycling, storage and export of 30,000m³ of waste soils per year, and also for the recovery of 15,000m³ of concrete, hardcore and tarmacadam for export and processing off-site.
- 2006⁵ (WA06/1491) Temporary use of washing plant for treating previously screened inert waste material produced by the recycling facility (WA06/1894).
- 2006⁶ (WA06/1894) Addition of a two-storey extension to the side of the workshop to provide welfare facilities comprising WC, lockers and canteen.
- 2007⁷ (GU07/0584 and WA07/0821/GU07/0757) Extend restoration period for southern extension (Area 'E', Area 'W' and the 'Tennis Court') until 31 October 2007).
- 2008, planning permission (reference WA08/1866) was granted for the storage of limestone scalplings for a further period of ten years until 31 December 2020 as well as the resiting of

⁴ 27 May 2003

⁵ October 2006

⁶ November 2006

⁷ June 2007

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storage bays for the storage of imported limestone scalplings and the installation of a wheelwash facility and resiting of existing wheel spinner.

- 2009⁸ (Ref: WA09/0856) Temporary use of approximately 1.54ha of land for the screening and washing of inert waste, comprising: power screen; washing plant; filter press building, associated tanks and equipment; conveyors and stockpile areas; underground ducting; storage bays; and associated hardstanding areas.
- 2018 (ongoing) Environment Act 1995 – Periodic Review of Mining Sites ‘ROMP’, Application for Determination of Conditions Homefield Sand Pit, Guildford Road, Runfold Planning Permissions WA97/1204 and GU97/1106, Appeal Decision dated 5 December 2000, WA/02/0445 and GU02/490, and WA2014/1591 & GU14/P/01630

4.0 ESTABLISHED USES

4.1 Homefield is currently operating under several planning consents as set out below.

Planning Permission Reference	Approved Description of Development
WA04/1876 Soils Recycling	April 2005 ⁹ (Ref: WA04/1876) Temporary use of land for the recycling, storage and export of soils from imported inert waste and the recovery of concrete, hardcore and tarmacadam for export and processing off-site.
WA09/0856 Recycling Plant	October 2009 ¹⁰ (Ref: WA09/0856) Temporary Use of approximately 1.54 ha of Land for the screening and washing of inert waste, comprising power screen, washing plant, filter press building, associated tanks and equipment, conveyors and stockpile areas, underground ducting, storage bays and associated hardstanding areas
WA11/0009 Workshop	April 2011 ¹¹ (WA11/0009) continued use of workshop for use in repairing on-site plant, machinery and lorries without compliance with condition 2 of planning permission WA02/1329 and GU02/1496, dated 10 March 2003, so as to allow use of the workshop to continue until 31 December 2020.
WA10/2109 Workshop Extension	February 2011 ¹² (WA10/2109) continued use of 2-storey extension to workshop to provide welfare facilities without compliance with condition 2 of planning permission ref: WA06/1894, until 31 December 2020.

⁹ Decision 04/04/2005

¹⁰ Decision 16/10/2009

¹¹ Decision 07/04/2011

¹² Decision 17/02/2011

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WA10/2108 Overnight Lorry Parking	February 2011 ¹³ (WA10/2108) continued use of land for overnight parking of up to 8 vehicles without compliance with condition 1 of planning permission ref: WA00/0711 until 31 December 2020.
WA08/1848 Storage Bays	February 2009 ¹⁴ WA08/1848 re-siting and retention of storage bays for limestone scalplings, installation of wheel wash facility and re-siting of existing wheel spinner

- 4.2 The above permissions are to be read in conjunction with approved non-material amendments details of which are set out in the table below.

NMA Reference	Approved Description of Development	Decision (Approval)
WA/2020/1753 Workshop	The non-material amendment to planning permission ref: WA11/0009 dated 7 April 2011 to remove the end date from the description of development pursuant to section 96A of the Town and County Planning Act 1990.	11/12/2020
WA/2020/1754 Workshop Extension	The non-material amendment to planning permission ref: WA10/2109 dated 17 February 2011 to remove the end date from the description of development pursuant to section 96A of the Town and County Planning Act 1990.	14/12/2020
WA/2020/1755 Overnight Lorry Parking	The non-material amendment to planning permission ref: WA10/2108 dated 16 February 2011 to remove the end date from the description of development pursuant to section 96A of the Town and County Planning Act 1990.	14/12/2020
WA/2020/1751 Storage Bays	The non-material amendment to planning permission ref: WA08/1848 dated 20 February 2009 to remove the end date from the description of development pursuant to section 96A of the Town and County Planning Act 1990.	14/12/3030

Environmental Permitting

- 4.3 The site operations are governed by the Pollution Prevention and Control (England & Wales) Regulations 2000, Environmental Permits and licenses issued by the EA.

¹³ Decision 16/02/2011

¹⁴ Decision 20/02/2009

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4.4 The Permits define limits for the amount and type of inert waste to be imported into Homefield and pollution emissions and monitoring requirements which must be adhered to. There are permits in place for the waste management activities as follows:

- Deposit of Inert Waste (Landfill) - FP3235PA (variation notice WP3937LB); and
- Waste Transfer Station with Treatment - EAWML 83666 (Original); EPR/DP3492LV (variation notice EPR/DP3492LV/V002, amend tonnage) and EPR/DP3492LV (variation notice EPR/DP3492LV/V003, amend waste codes).

Working Hours

4.5 The site will continue to operate in accordance with the permitted working hours set out below.

Planning Permission Reference	Working Hours
WA04/1876 Soils Recycling Condition 4	Authorised operations or activities permitted: Monday to Friday: 0730-1800; and Saturdays: 0800-1300. No lights illuminated to be illuminated outside these times.
WA09/0856 Recycling Plant Condition 3	No servicing, maintenance or testing of plant to be carried out between 1800 and 0700 hrs Nor shall any other operation or activity take place on a Sunday or any public holiday. This shall does prevent the carrying out of emergency operations, but these should be notified to the County Planning Authority.
WA08/1848 Storage Bays Condition 6	
WA11/0009 Workshop Condition 5	Carrying out of repair and maintenance of vehicles, plant and machinery within the workshop building: Monday to Friday (excluding Public holidays): 0800-1800; and Saturdays: 0800-1200. With the written permission of the County Planning Authority, urgent repairs to machinery may be carried out at times other than stated above. No audible sound shall be emitted at any other times. authorised operations permitted
WA10/2109 Workshop Extension Condition 4	Workshop extension/welfare facilities may be used: Monday to Friday: 0730-1800; and Saturdays: 0800-1300.
WA10/2108 Overnight Lorry Parking Condition 4	No parked vehicles shall be started before: Monday-Friday: 07.30; and Saturdays: 08:00. No parked vehicles shall be started or moved on Sundays or Bank Holidays.

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Employment

- 4.6 The Chambers Runfold PLC operation supports 44 full time employees, including drivers and support staff.

5.0 PROPOSED DEVELOPMENT

Soils Recycling (Permission WA04/1876)

- 5.1 Plan HF/SR/1, December 2020 shows the permitted site boundaries for consent ref WA04/1876, for the recycling, storage and export of soils from imported inert waste and the recovery of concrete, hardcore and tarmacadam for export and processing off-site.
- 5.2 The recycling is an integral part of the Applicant's existing waste operations, with Homefield acting as a receiving centre for inert wastes from the surrounding area.
- 5.3 Screened soils are produced from this local waste stream, which it is not possible to achieve at either of the Applicant's other two sites, owing to lack of space.
- 5.4 Saleable soil can only be produced at certain times of the year, so during poor weather conditions the soils materials recovered are used to progress restoration of the void.
- 5.6 As crushing activities are not permitted at Homefield, oversized concrete from the screening process is exported off-site to the Applicant's site as Hollybush Lane for processing.
- 5.7 The site will continue to operate in accordance with current planning conditions which restrict the export of soils and recovered concrete, hardcore and tarmacadam from Homefield to 30,000m³ per annum and 15,000m³ per annum respectively.¹⁵
- 5.8 Screening and recycling would be ongoing in the south-east of the site until the main part of the landfill has progressed beyond which it is no longer possible to retain the activities in their current location. At this point they would be relocated to the existing main Plant Area as indicated on the Plan "Indicative Recycling Areas" (SLC/RECYC/1/Rev A, December 2020).
- 5.9 The recycling and screening operations would continue to be undertaken in compliance with extant conditions to control noise and dust emissions, as described in Section 7.0 of this Planning

¹⁵ Condition 5 of Planning Permission WA09/0856

Statement.

Proposed Description of Development

5.10 The proposed development is for:

“Continued use of the land for the recycling, storage and export of soils from imported inert waste and recovery of concrete, hardcore and tarmacadam for export and processing off site without compliance with conditions 1, 3 and 6 of planning permission ref: WA04/1876 dated 4 April 2005.”

Proposed Changes to Planning Conditions

5.11 It is proposed to amend Conditions 1, 3 and 6 of planning permission ref. WA04/1876 as set out below.

Condition 1 – Approved Plans

5.12 Approved plans for permission WA04/1876 which do not meet the requirements set out in Article 7(2)(c) of the DMPO 2015 and nPPG have been updated and form part of this submission. The planning application boundaries remain unchanged from the approved plans. The approved and ‘substitute’ plans are listed in the table below.

5.13 Plan SLC/RECY/1 has been revised (SLC/RECY/1/Rev A) to take account of the location of the existing recycling plant area and proposals to revise the landfill phasing to be addressed as part of the separate ‘ROMP’ application.

5.14 It is proposed that the substitute plans should be listed under Condition 1 of a new s73 planning permission for an extension of time for the recycling and screening activities.

Approved Plans	Substitute Plan
Location Plan CPG/RCG/1, July 2004	Site Location Plan HF/SR/1, (1:2000), December 2020
Detail of Recycling Areas SLC/RECYC/1, 25 March 2004	Indicative Recycling Areas SLC/RECYC/1/Rev A, December 2020

Condition 3 – Duration

5.15 Under condition 3 the soils recycling activities are linked to the restoration of the mineral working. It is proposed to align the recycling activities to the ongoing progressive restoration of the site as follows.

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~~“This permission shall be for a temporary period ending on completion of the infilling of phase 8 in accordance with the approved landfill phasing as outlined in drawing SLC/RECYC/1 Rev A. At that time the use of the site for the recycling activities hereby permitted shall cease and the machinery, equipment, bunds and materials stored in connection with the recycling activity shall be removed from the site, and the land restored in accordance with the approved restoration scheme for the site (ref. GU02/0490 & WA02/0445).”~~

5.16 Condition 6 - Limitations

“All waste or materials stockpiled in connection with the recycling operations at the site, shall be stored within the storage bays or the compound areas delineated on drawing ref: SLC/RECYC/1 Rev A dated ~~25 March 2004~~, such storage mounds shall not exceed the surrounding bunds in height, which is 5 meters in Area 1 phase-8 and 6 metres in phase-9 Area 2.”

Recycling Plant (Permission WA09/0856)

- 5.17 Plan HF/WP/1, December 2020 shows the permitted site boundaries for consent ref WA09/0856 for the screening and washing of inert waste.
- 5.18 The CD&E plant is an effective washing system incorporating washing plant, aggregate stockpile conveyors, a filter press and water recycling facility.

Warrior Power Screen

- 5.19 The screener recovers oversize brick and concrete material (>80mm), which is transported off-site for crushing. The 10-80mm fraction is processed using the washing plant. The installation of the Warrior Power Screen would advance the recycling operation and its location alongside the washing plant would be both efficient and practical during the drier months in the year. Only one 360° excavator would be required to feed the plant which reduces the number of machines operating on site. During the wetter months, the screener would not be used and replaced with a 'live head' attached to the washing plant, which is capable of screening out the 80mm material.

Filter Press

- 5.20 The Filter Press squeezes the moisture from the silt slurry, leaving a cake which can be used as a restoration material. The Press is housed in a green corrugated metal clad building, approximately 22m in length, 7m wide and 10m high, with associated flocculent, recycled water and clean water tanks.

Storage Bays

- 5.21 Seven concrete bays for storing recycled materials from the washing plant are located alongside the filter press. These include 10mm stone, 20mm stone, 40mm stone and 60-80mm stone and 20mm ballast (a mixture of 20mm stone and sharp sand). Two additional bays accommodate sharp and soft sands stockpiles as they emerge directly from the conveyor from the washing plant process.
- 5.22 The Plant Area includes areas of hardstanding to maintain efficient and tidy operations.

Proposed Description of Development

- 5.23 The proposed development is for:
 “Continued use of approximately 1.54 hectares of land for the screening and washing of inert waste, comprising power screen, washing plant, filter press building, associated tanks and equipment, conveyors and stockpile areas, underground ducting, storage bays and associated hardstanding areas without compliance with conditions 1, 2 and 4 of planning permission ref: WA09/0856 dated 16 October 2009.”

Proposed Changes to Planning Conditions

Condition 1 – Approved Plans

- 5.24 Approved plans for permission WA04/1876 which do not meet the requirements set out in Article 7(2)(c) of the DMPO 2015 and nPPG have been updated and form part of this submission. The planning application boundaries remain unchanged from the approved plans. The approved and ‘substitute’ plans are listed in the table below.
- 5.25 Plan SLC/RECY/1 has been revised (SLC/RECY/1/Rev A) to take account of the location of the existing washing plant compound and proposals to revise the landfill phasing as part of the separate ROMP application.
- 5.26 It is proposed that the substitute plans should be listed under condition 1 of a new s73 planning permission for an extension of time for the recycling and screening activities.

Approved Plans	Substitute Plans
Site Plan HMFLDP/FP1, March 2009	Site Location Plan HF/WP/1, (1:2000), December 2020
Detail of Recycling Areas SLC/RECYC/1, 25 March 2004	Indicative Recycling Areas SLC/RECYC/1/Rev A, December 2020

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Condition 2 – Duration

- 5.27 Under condition 2, the screening and washing activities are linked to the restoration of the mineral working. It is proposed to align the recycling activities to the ongoing progressive restoration of the site as follows.

“This permission shall be for a temporary period until 31 December 2020 30 or until the washing / recycling compound (~~phase 9~~) is no longer required in association with the restoration of the site, whichever is the sooner. ~~All landfilling should be in accordance with the approved landfill phasing as outlined in drawing SLC/RECYC/1 approved under WA04/1876.~~ At the requisite time the use of the site for the recycling activities hereby permitted shall cease and the machinery, equipment, bunds and materials stored in connection with the washing / recycling activity shall be removed from the site, and the land reinstated in accordance with the approved restoration scheme for the site (~~ref. GU02/0490 & WA02/0445~~)”

Condition 4 – Limitations

- 5.28 Under condition 4, the screening of waste materials for export hereby permitted shall not take place when a screener is operational in ~~Phase 8 in accordance with planning permission WA04/1876~~ Area 1 shown on Plan SLC/RECYC/1 Rev A. All screened/washed waste recovered from the screening and washing facility, shall be stockpiled within Area 1 ~~Phase 8~~, the site area or stored within the designated storage bays as delineated on Drawing No. HMFLDWP/2 – Washing Plant Layout Plan dated Dec 08.”

Workshop (Permission WA11/0009)

- 5.29 The existing workshop lies within the north west part of Homefield. To the north of the workshop is site car park for staff and visitors and to the immediate north east, the site office and weighbridges.
- 5.30 The existing workshop replaced a smaller workshop originally granted in 2002 (planning permission ref GU02/1496 and WA02/1329) and was necessary to accommodate the larger machinery brought into use.
- 5.31 The existing workshop building measures 25m x 16m (400m² of floor space) and 8.46 m to the ridge and is built from plastisol coated galvanised steel sheets in goosewing grey. The current permission (ref: WA11/0009) allows the workshop to be retained until 31 December 2020. An extension was added onto the eastern side of the workshop to provide essential welfare facilities for site employees (granted under planning permission (ref: WA10/2109)).

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5.32 SCC previously accepted that the workshop is ancillary and fundamental to the approved mineral development and ongoing landfilling and restoration of the site. This remains the case.

Proposed Description of Development

5.33 The proposed development is for:

“Continued use of workshop for use in repairing onsite plant, machinery and lorries without compliance with conditions 1 and 2 of planning permission ref: WA11/0009 dated 7 April 2011 (as amended by planning application ref: WA/2020/1753 dated 11 December 2020).

Proposed Changes to Planning Conditions

Condition 1 – Approved Plans

5.34 Approved plans for permission WA011/0009 which do not meet the requirements set out in Article 7(2)(c) of the DMPO 2015 and nPPG have been updated and form part of this submission. The planning application boundaries remain unchanged from the approved plans. The approved and ‘substitute’ plans are listed in the table below.

5.35 It is proposed that the substitute plans should be listed under condition 1 of a new s73 planning permission for an extension of time for the recycling and screening activities.

Approved Plans	Substitute Plans (November 2020)
Ownership Plan CPG/HFWKS/5, December 2010	Site Location Plan HF/WKS/1, (1:2000)
Site Plan CPG/HFWKS/3A, December 2010	Site Plan HF/WKS/2, (1:500)

Condition 2 – Duration

5.36 Under condition 2 the workshop is linked to the permitted extraction, landfilling and restoration activities. It is proposed to align retention of the workshop with the permission for the final restoration of the site as follows.

“This permission shall be for a limited period expiring on ~~31 December 2020~~ 22 February 2042, or until the permitted extraction, landfilling and restoration operations cease whichever is the sooner. At that time the use of the building as a workshop shall cease and the building shall be removed from the site, and the land restored in accordance with the approved restoration scheme for the site.”

Workshop Extension (Permission WA10/2109)

- 5.37 A two-storey extension on the eastern side of the workshop provides essential welfare facilities for site employees (granted under planning permission (ref: WA10/2109)).
- 5.38 The extension measures 11m x 3m and is 5.7m in height (66m² of floor space). It is built from plastisol coated galvanised steel sheets in goosewing grey. The current permission (ref: WA10/2109) allows the workshop extension to be retained until 31 December 2020.
- 5.39 SCC previously accepted that the workshop extension is ancillary and fundamental to the approved mineral development and ongoing landfilling and restoration of the site which is permitted until 22 February 2042. This remains the case.

Proposed Description of Development

- 5.40 The proposed development is for:
 “Continued use of two storey extension to side of workshop to provide welfare facilities without compliance with conditions 1 and 2 of planning permission ref: WA10/2109 dated 17 February 2011 (as amended by planning application ref: WA/2020/1754 dated 14 December 2020) (to extend the time period of the development.)

Proposed Changes to Planning Conditions

Condition 1 – Approved Plans

- 5.41 Approved plans for permission WA10/2109 which do not meet the requirements set out in Article 7(2)(c) of the DMPO 2015 and nPPG have been updated and form part of this submission. The planning application boundaries remain unchanged from the approved plans. The approved and ‘substitute’ plans are listed in the table below.
- 5.42 It is proposed that the substitute plans should be listed under condition 1 of a new s73 planning permission for an extension of time for the recycling and screening activities.

Approved Plans	Substitute Plans (November 2020)
Site Plan CPG/HFWKS/3, November 2010	Site Plan HF/WKS/Ext/2, (1:2000)
	Site Location Plan HF/WKS/Ext/1, (1:500)

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Condition 2 – Duration

- 5.43 Under condition 2 the workshop extension is linked to the permitted extraction, landfilling and restoration activities. It is proposed to align retention of the workshop with the permission for the final restoration of the site as follows.

“This permission shall be for a limited period expiring on ~~31 December 2020~~ 22 February 2042, or until the permitted extraction, landfilling and restoration operations cease whichever is the sooner. At that time the use of the building as a workshop shall cease and the building shall be removed from the site, and the land restored in accordance with the approved restoration scheme for the site.”

Overnight Lorry Parking (Permission WA10/2108)

- 5.44 The parking area lies approximately 38m to the southeast of the access into the site from Guildford Road, and to the south of ‘Whiteways Cottage’.
- 5.45 Permission was originally granted for the use of this area for the overnight parking for up to 8 vehicles in 1985 under WA/1985/0407.
- 5.46 SCC previously accepted that the overnight lorry parking is ancillary and fundamental to the approved mineral development and ongoing landfilling and restoration of the site which is permitted until 22 February 2042. This remains the case.
- 5.47 This provision ensures that vehicles associated with the site can be parked overnight removing additional traffic from local roads.

Proposed Description of Development

- 5.48 The proposed development is for:

“Continued temporary use of the land for the overnight parking of up to 8 vehicles without compliance with conditions 1 and 2 of planning permission ref: WA10/2108 dated 16 February 2011 (as amended by planning application ref: WA/2020/1755 dated 14 December 2020).

Proposed Changes to Conditions

Condition 1 – Approved Plans

- 5.49 Approved plans for permission WA10/2108 which do not meet the requirements set out in Article 7(2)(c) of the DMPO 2015 and nPPG have been updated and form part of this submission. The

planning application boundaries remain unchanged from the approved plans. The approved and ‘substitute’ plans are listed in the table below.

5.50 It is proposed that the substitute plans should be listed under condition 1 of a new s73 planning permission for an extension of time for the recycling and screening activities.

Approved Plans	Substitute Plan (November 2020)
Site Plan CPG/HFLP/2, November 2010	Site Location Plan HF/LP/1, (1:2000)
	Site Plan HF/LP/2, (1:500)

Condition 2 – Duration

5.51 Under condition 2 the lorry parking is linked to the permitted extraction, landfilling and restoration activities. It is proposed to align retention of the workshop with the permission for the final restoration of the site as follows.

“The use of the land hereby permitted shall cease on ~~31 December 2020~~ 22 February 2042 or upon the substantial completion of the permitted extraction, landfilling and restoration operations on the surrounding land, whichever is the sooner, and the land restored in accordance with the approved restoration scheme.”

Storage Bays (Permission WA08/1848)

5.52 Permission for the 3 storage bays was originally granted in 1988 and they have remained in their current location within the site since the early 1990s.

5.53 The 3 bays lie to the south of the weighbridge approximately 25m south east of the workshop. Each of the 3 concrete bays measures 10m by 6.4m. Access to the bays is off the ‘in haul’ road so that vehicles can drive up to the bays, deliver or collect material and then continue southward, turn, travel through the wheel wash and exit via the ‘out’ haul road.

5.54 Limestone scalpings are imported to and exported from the site on a small scale to serve a local need for the supply of highway engineering and fill material, for example to utility companies. The limestone provides an alternative product for customers if the Recycling Plant is not operational for any reason. An existing planning condition limits the quantity of scalpings stored on site at any one time to no more than 150 tonnes.

5.55 SCC previously accepted the suitability of the storage bays in their current location to ensure the segregation of traffic and safety of on-site operations and that the bays are ancillary to the

approved mineral development and ongoing landfilling and restoration of the site which is permitted until 22 February 2042. This remains the case.

Proposed Description of Development

5.56 The proposed development is for

“Retention of storage bays for the storage of imported limestone scalplings; and retention of a wheelwash facility and wheel spinner without compliance with condition 1 and 3 of planning permission ref: WA08/1848 dated 20 February 2009 (as amended by planning application ref: WA/2020/1751 dated 14 December 2020) (to extend the time period of the development).

Proposed Changes to Planning Conditions

Condition 1 – Approved Plans

5.57 It is proposed that the substitute plans should be listed under condition 1 of a new s73 planning permission for an extension of time for the recycling and screening activities.

Approved Plans	Substitute Plan (November 2020)
Site Plan HMFLD/SB1/A, August 2008	None required by mineral planning authority
Plan HMFLD/SB2, July 2008	

Condition 3 – Duration

5.78 Under condition 3 the retention of the storage bays is linked to the permitted extraction, landfilling and restoration activities. It is proposed to align retention of the storage bays with the permission for the final restoration of the site as follows.

“The storage bays hereby permitted shall be removed and the storage of imported limestone scalplings hereby permitted shall cease no later than ~~31 December 2020~~ 22 February 2042 or upon cessation of mineral working and the restoration of the site whichever is the sooner.”

6.0 PLANNING POLICY AND LEGISLATION

Waste Framework Directive (2008/98/EC)

- 6.1 The EU Waste Framework Directive (WFD), as amended, lays down waste management obligations for Members States; to establish an integrated and effective network of waste disposal plants, prepare waste management plans, ensure the proper storage and handling of wastes and that waste treatment operations are regulated by means of an environmental permit.
- 6.2 Article 4 of the WFD sets out a 'waste hierarchy'. This is a system of prioritising the different ways in which waste can be managed with the most sustainable method, prevention, at the top of hierarchy, followed by reduction through reuse, recycling, recovery and finally disposal, at the bottom of the hierarchy. It is intended that waste is managed as high up the waste hierarchy as possible recognising which will require a mix of types and scale of facilities.
- Prevention;
 - Preparing for re-use;
 - Recycling;
 - Other recovery (e.g. energy recovery); and
 - Disposal.
- 6.3 The Directive is implemented through the Waste (England and Wales) Regulations 2011 which require businesses to confirm that they have applied the waste management hierarchy when transferring waste.

National Planning Policy

National Planning Policy Framework

Presumption in Favour of Sustainable Development

- 6.4 The National Planning Policy Framework (NPPF), updated February 2019, sets out the Government's planning policies for England. At its' heart is a presumption in favour of sustainable development which applies both to plan-making and decision-taking. The NPPF reinforces the plan led system as the starting point of decision taking and, unless material considerations indicate otherwise, development proposals which accord with the Development Plan are to be approved without delay. The NPPF is supported by national Planning Practice Guidance (nPPG).

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- 6.5 The government is currently consulting on major reforms to the planning system in Planning for the Future, August 2020¹⁶. These reforms would mean consequential changes to the NPPF and the National Planning Policy for Waste (see below).

National Planning Policy for Waste

- 6.6 The National Planning Policy for Waste (NPPW) 2014 replaced Planning Policy Statement 10 and sits alongside the NPPF. The NPPW sets out the Government's commitment to work towards a more sustainable approach to waste management. This includes ensuring that waste is managed as high up the waste hierarchy as possible recognising the need for a mix of types and scale of facilities.

Waste Management Plan for England

- 6.7 The national Waste Management Plan for England (WMPE), December 2013, outlined the policies in place to help move towards the goal of a zero-waste economy in the UK and how it will support implementation of the objections and provisions of the WFD. This year, the Government published a revised draft WMPE, August 2020 for consultation, which provides an analysis of the current waste management situation in England. The WMPE is primarily about the quantity of waste there is in England and how the waste is managed and it reflects policies included in the Government's Resources and Waste Strategy published in 2018.
- 6.8 The WMPE 'sits under' the 25 Year Environment Plan (25 YEP) and Resources and Waste Strategy.
- 6.9 The 25 YEP is the government's long strategy for improving the environment within a generation. It includes commitments to double resource productivity by 2050, reuse materials and to minimise and manage waste to reduce their impact on the environment.
- 6.10 The Resources and Waste Strategy sets out how resources will be preserved by minimising waste, promoting resource efficiency and moving toward a circular economy, in line with the 25 YEP.
- 6.11 The revised WMPE confirms that the annual recovery rate for non-hazardous construction, demolition and excavation (C,D&E) waste in England has remained at around 92% since 2010 and that in the 2016 the rate was 92.1% for England. The C,D&E sector is the largest contributing

¹⁶ MHCLF Ministry of Housing, Communities and Local Government

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sector to total waste generation. In 2016 it accounted for almost 64% (120.3 million tonnes) of total waste generation. It sets out that:

“inert waste can or should be recovered or recycled whenever possible. However, the disposal of inert waste in or on land i.e. landfill, remains a valid way of restoring quarries and worn out minerals workings where this is a planning requirement.”

Local Planning Policy

Development Plan

6.12 In relation to this planning application, the Development Plan comprises:

- Surrey Waste Plan (SWP), adopted December 2020;
- Aggregates Recycling Joint DPD for the Minerals and Waste Plans, adopted 2013 (period to 2026);
- Surrey Minerals Plan (SMP), adopted 2011 - Core Strategy Development Plan Document (DPD) and Primary Aggregates DPD;
- Waverley Local Plan Part 1: Strategic Policies and Sites, adopted 2019. ‘Saved’ Policies of the Waverly Local Plan 2002; and
- Farnham Neighbourhood Plan 2013-2032 (updated for March 2020 Referendum (January 2020) and adopted by Waverley Borough Council and “made” on 3 April 2020.

6.13 The Minerals Site Restoration Supplementary Planning Document (adopted July 2020) sits alongside the SMP.

Surrey Waste Local Plan 2019-2033

6.14 The Surrey Waste Local Plan (SWLP) covers the period 2019-2033 and replaces the 2008 Surrey Waste Plan.

Waverley Local Plan

6.15 The new Waverly Local Plan (WLP), will cover the period to 2032. Part 2: Site Allocations and Development Management Policies. Preferred options consultation 25 May to 9 July 2018. Reviewing responses and developing pre-submission plan. Current timetable¹⁷ is consultation on the proposed submission plan November/December 2020, submission to the Secretary of State February 2021 and anticipated adoption November/December 2021.

¹⁷ Based on Local Development Scheme July 2020

Emerging Plans

- 6.16 The adopted Minerals and Waste Plans will be replaced by a joint “Surrey Minerals and Waste Plan” (SMWP). Work is to begin in 2021 in accordance with the updated Minerals and Waste Development Scheme.

Planning Policy Review

Adequate and Steady Supply of Aggregates

- 6.17 The NPPF refers to the mutually dependent economic, social and environmental roles of the planning system to achieve sustainable development. Paragraph 8 sets out the importance of building a “strong, responsive and competitive economy”.
- 6.18 Paragraph 80 sets out that planning policies and decisions should “create the conditions in which business can invest, expand and adapt, and that “significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”.
- 6.19 Linked to the delivery of these objectives, the NPPF establishes that a sufficient supply of minerals is essential to the provision of “the infrastructure, buildings, energy and goods that the country needs”.
- 6.20 Para 204 “Planning policies should:
- b) so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.
 - e) safeguard existing, planned and potential sites for:... the handling, processing and distribution of substitute, recycled and secondary aggregate material.
- 6.21 Mineral planning authorities (MPA) must plan for a steady and adequate supply of aggregates by preparing an annual Local Aggregate Assessment (LAA) to forecast future demand and assess all supply options including secondary and recycled sources. MPAs should make provision in their local plans for all elements of the LAA through the identification of specific sites, preferred areas and/or areas of search and location criteria policies (Paragraph 207).

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6.22 “The Aggregate Recycling Joint Development Plan Document (ARJDPD) seeks to increase the use of secondary and recycled materials as substitutes for primary aggregate and consequently to reduce the amount of construction and demolition waste disposed of to landfill.

Waste Management Capacity and C,D&E Recycling Targets

6.23 **Strategic Objective 1** of the **SWLP** seeks to:

“make sure enough waste management capacity is provided to manage the equivalent amount of waste produced in Surrey”.

6.24 **Strategic Objective 2** of the **SWLP** seeks to:

“encourage development which supports sustainable waste management at least in line with national targets for recycling, recovery and composting”.

6.25 The SWP 2020 targets seek to increase recycling of waste and reduce landfill including inert construction, demolition and excavation (C,D&E) waste. Significant quantities of this waste arise in the county; it makes up one third of the total controlled waste stream produced in Surrey each year and is also imported into the County from London and elsewhere in the South East.

6.26 As defined in the SWLP:

“inert C,D&E waste is the range of inert materials which arise from the construction or demolition of buildings and civil engineering projects and includes soils which have been excavated as a result of site preparation activities” (SWLP paragraph 5.2.3.1).”

and

“Inert C,D&E waste recycling encompasses the screening, processing, crushing, washing or other similar activities which produce materials such as recycled aggregates and soils that are suitable for sale. Such operations typically take place in the open, and are suited to rural locations, although some methods of treatment can be enclosed” (SWLP paragraph 5.2.3.2).

6.27 In Surrey, the recycled aggregates that are substituted for land won aggregates are primarily materials derived from inert C,D&E waste. Recycled aggregates include:

- Hard construction and demolition waste (segregated or mixed unprocessed / uncrushed materials, in particular concrete, masonry, bricks, tiles and ceramics).
- Excavation waste (naturally occurring stone, rock and similar materials which have been excavated as a result of site preparation activities).
- Bituminous materials (arising from road engineering works)” (SWP paragraph 5.2.3.3).

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- 6.28 In 2017, 58% of construction, demolition and excavation (CDE) was recycled in Surrey. The SWLP sets targets to increase this rate over the plan period to 70% by 2025, 75% by 2030 and 80% by 2035 (Table 3).¹⁸
- 6.29 The Joint ARDPD makes provision for new facilities that together with existing facilities provide productive capacity for the supply of recycled and secondary aggregates at a rate of at least 0.8mtpa by 2016 and of at least 0.9mtpa by 2026.

Capacity and Need

- 6.30 In accordance with the WFD and NPPW the county council, as Waste Planning Authority (WPA), aims to be net self-sufficient and so plan for waste infrastructure sufficient to manage capacity to deal with the equivalent amount of waste to that which is generated within the county.
- 6.31 SWLP paragraph 5.1.1.4 recognises that the sustainable management of waste, including through maximising opportunities for recycling and recovery, will contribute to achieving sustainable development, by making best use of natural resources (**SWLP Policy 1** Need for Waste Development). To this end, it encourages additional recycling ahead of recovery capacity.
- 6.32 Paragraph 3.2.1 of the SCC Local Aggregates Assessment (LAA 2020) states that as at end 2018 capacity was over 1.6 million tonnes per annum (mtpa) from the contribution of sites listed below

Extract from LAA, Annex 2: Aggregate recycling facilities in Surrey 2018 Capacity tonnes per annum (TPA)

Temporary sites

West of Queen Mary's Res	200,000
Stanwell Quarry	217,000
Hithermoor Quarry	250,000
Addlestone Quarry	100,000
Homefield Sandpit	217,500
Runfold South	50,000
	1,034,500

Total Permanent sites

¹⁸The WFD required a minimum of 70% (by weight) of non-hazardous C,D&E waste to be prepared for re-use, recycled or undergo other material recovery by 2020. Recycling targets for 2025 and beyond are based on continuous improvement and ongoing commitment to reduce C,D&E waste. A target of 80% seeks to build on this high level of recycling and align with other policies including the Surrey ARJDPD which encourages the production of recycled aggregates at suitable locations' (paragraph 1.4.2.9).

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Sunnyside, Clasford Bridge	62,500
Capital House	18,000
Little Orchard Farm	300,000
Normans Corner	33,000
Perrylands	42,500
Reigate Road	45,000
Plough Industrial Estate	49,000
Kill Copse	16,500
Total	566,500
Total	1,601,000

- 6.33 Some 65% of this capacity is provided on sites with temporary planning permission. Hence, there is the likelihood of significant capacity loss over the next ten years with the expected closure of temporary facilities. Table 6 shows the extent of the loss based on the C,D&E waste arisings forecast and current time limited permissions (-14,000 tonnes in 2020 rising to -389,000 by 2025, -834,00 by 2030 and -1,159,000 by 2035).

Anticipated aggregates recycling capacity loss

Table 6 Recycling capacity (tonnes) lost based on current temporary permissions	Expiry	Capacity Loss	Cumulative Remaining Capacity
Site Name			
Runfold South	2018	- 50,000	1,551,000
Addlestone Quarry	2020	-100,000	1,451,000
Hithermoor Quarry	2022	-250,000	1,201,000
Stanwell Quarry	2027	-217,000	984,000

- 6.34 The LAA anticipates that there will be sufficient capacity in the short to medium term to maintain a supply of at least 1.0mtpa until 2027. There are no allocations proposed in the Plan for C,D&E recycling facilities, as historically these have come forward as temporary land uses at operational mineral workings (SWLP, paragraph 1.4.3.8). A number of sites are allocated for C,D&E recycling the ARJDPD. It is expected that a full review of the land potentially available for recycled aggregate production will be undertaken as part of a new Joint Minerals and Waste Local Plan.

Recycled and Secondary Aggregates Sales

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6.35 The LAA (2020) sets out that sales of recycled and secondary aggregates have increased significantly over the last twelve years. The SMP target is for at least 0.9 mtpa by 2026, which was exceeded by the 2018 sales figure. A rate of 1.0 mtpa is considered to be a robust basis for assessing future supply capacity (based on the 3 year sales average and the increasing reliance on recycled aggregates as a source of supply).

6.36 The 2018 sales figure of 0.99mt, whilst down on the previous year's sales, exceeds the 2026 target of 0.9 mtpa of recycled aggregate. The decrease in sales is largely due to some sites taking significantly smaller tonnages in 2018 or ceasing to operate. It is also worth noting that as annual survey data only captures production from fixed sites, actual production figures will be higher given the volumes of recycled aggregates produced on construction and demolition sites using mobile plant.

Location of Development

6.37 The SWLP confirms in paragraph 4.2.1.1 that Surrey has a need for additional waste management capacity. The Spatial Strategy sets out that this need is provided for

“by generally safeguarding existing capacity and by appropriate extension and enhancement to existing facilities and by the development of new facilities in suitable locations.”

6.38 Paragraph 4.1.1.3 sets out that sites currently in waste management use are safeguarded as they make an important contribution to the provision of capacity sufficient to manage the equivalent of the amount of waste arising in Surrey.

6.39 SCC recognises the need for and encourages the provision of a network of waste management facilities of different sizes and scale. In relation to aggregate recycling, demolition waste is a bulky, low value material which is heavy and therefore expensive to transport, so recycling facilities need to be close to sources of waste and potential markets (Paragraph 4.10 of the SMP Core Strategy).

6.40 SWLP Policy 11 and paragraph 4.1.1.4 presents a hierarchy showing the broad preferences for development.

- Sites and areas outside the Green Belt including allocated waste sites, existing waste sites, 'ILAS' and other suitable sites;
- Sites and areas within the Green Belt, including allocated sites, existing sites within the Green Belt and other suitable sites;

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- Sites and areas which are likely to result in significant adverse impacts to ‘areas or assets of particular importance.’

6.41 Figure 5 of the SWLP sets out that the hierarchy shows:

“broad categories of land and general preference in considering locations which are acceptable for new (emphasis mine) waste management facilities.”

6.42 In relation to such locations for new development, the SWLP identifies 5 waste site allocations. Of these only one, ‘Land to the north east of Slyfield Industrial Estate, Guildford’ is on land outside the Green Belt.

6.43 The Plan also identifies numerous ‘Industrial Land Areas of Search’ (‘ILAS’), which whilst not allocations, are considered to be appropriate in principle for waste management facilities.

6.44 Specifically in relation to sites for inert C,D&E recycling, the ARJDPD identifies the types of sites capable of contributing to the future provision of aggregate recycling capacity, including:

- Existing permanent sites.
- Existing temporary sites.
- In-situ temporary recycling at excavation and demolition sites.
- Potential new temporary and permanent sites.
- Windfall capacity including intensification and / or extensions to existing sites” (SWLP paragraph 5.2.3.4).

6.45 Paragraph 4.13 of the SMP recognises that:

“temporary aggregate recycling facilities can be appropriately located at mineral workings undergoing restoration. Here they enable the sorting and processing of construction and demolition waste, leaving the residues to be used in restoration.”

6.46 The benefits of this ‘co-location’ of activities is elaborated upon in paragraph 66 of the ARJDPD which states:

“Significantly, an aggregate recycling facility would act as a catalyst for attracting a greater volume of higher quality C, D & E waste for recycling. Residual waste from the recycling operation could then be landfilled into the former mineral working rather than be sent off site, hence lessening the impact of double handling and reducing lorry traffic/ movements. The presence of an aggregate recycling facility may therefore assist in securing earlier restoration of the mineral working as more C, D & E waste would be attracted to the site.’

6.47 SWLP (paragraph 5.2.3.6) recognises that:

“a significant proportion of existing inert C,D&E waste recycling facilities are located on land associated with mineral workings. These facilities benefit from temporary permissions which are associated with the timescale for mineral extraction and site restoration. A key part of the policy approach is therefore to continue to encourage temporary inert C,D&E recycling operations on suitable land associated with operational mineral workings.

Temporary C,D&E recycling operations may also be associated with the restoration of landfilling and landraising sites. Any proposal for a C,D&E recycling facility on land which constitutes a restored former mineral working would be considered in accordance with clause A iv) of Policy 3.

6.48 SWLP paragraphs 5.2.3.7 to 8 continue:

“The approach within the Plan is to encourage the sustainable management of waste in line with the waste hierarchy. As such, the Plan promotes the recycling of inert material over the recovery of this material to land. The county council recognises the tension that may exist between supporting recycling of inert C,D&E waste and encouraging timely restoration, as ongoing recycling might slow down restoration.

Facilities for inert C,D&E waste recycling should be sited in locations easily accessible from the sources of the wastes and may be temporarily linked to a specific development e.g. mineral working or large construction project. These types of developments will be supported where it can be demonstrated that facilities will not cause unacceptable impacts on amenity, communities or the environment.”

6.49 **SWLP Policy 3** complements the SMP and ARJDPD by establishing criteria against which SCC will consider proposals for managing inert C,D&E waste (including soils recycling) and it supports such facilities where:

- i) The site is allocated in the Aggregates Recycling Joint Development Plan Document, or
- ii) the site is a mineral working where the nature and duration of the proposed activity is limited to the consented operation and/or restoration of the mineral working, or
- iii) the site is for landraising or landfilling where the nature and duration of the proposed operations is limited to the consented activity, or
- iv) the site is otherwise suitable for inert C, D & E waste recycling operations when assessed against policies in the Surrey Waste Local Plan and the Spatial Strategy.’

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- 6.50 SWLP Section 5.2.8 recognises that existing waste development in Surrey is often well-established having been in operation for many years and that the extension (physical or temporal) may enable more waste to be recycled, recovered or processed for re-use within the established footprint of the site. The SWLP supports waste development which seeks to improve the capacity and efficiency of existing waste developments when considered against the waste hierarchy and without unacceptable impacts on communities and the environment.
- 6.51 Proposals for the improvement or extension of existing inert construction, demolition and excavation waste recycling facilities are to be considered under **SWLP Policy 8**. The policy supports such extensions, whether physical or temporal, of existing waste management facilities where:
- i) Any resulting change to the type and/or quantity of waste managed at the site is consistent with this Plan's requirements for the management of waste and that the quantity of waste to be managed is equal to or greater than the quantity of waste currently managed on site.
 - ii) Benefits to the environment and local amenity will result....
 - iv) The improvement or extension of a facility for recycling of inert construction, demolition and excavation waste is consistent with Policy 3.

Proposals should include consideration of the original reason(s) for the permission being time limited and not result in development (or extensions to time) that would undermine them.'

- 6.52 **SWP Policy WD7** recognises the legitimate use of materials that cannot practicably and reasonably be reused, recycled or processed, to restore mineral sites for beneficial use.

Green Belt

- 6.53 As set out in Section 13 of the NPPF, the fundamental aim of Green Belt policy is to prevent urban sprawl and the coalescence of settlements by keeping land permanently open.
- 6.54 Mineral extraction is not inappropriate in the Green Belt provided the development preserves its openness and does not conflict with the purposes of including land within it.
- 6.55 Inappropriate development is, by definition, harmful to the Green Belt and will only be allowed if very special circumstances (VSC) can be demonstrated. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations associated with the proposal, either on their own or in combination.

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6.56 SWLP paragraph 5.3.1.4 states that:

“Waste development that may not be considered ‘inappropriate’ includes that which is related to the restoration of mineral sites that can play a positive role in meeting the objectives of the Green Belt...However, it is important to recognise that on its own, this development would be inappropriate and therefore it should remain linked to the restoration.”

6.57 SWLP paragraph 5.3.1.5 continues:

“It is considered unlikely that the anticipated waste management needs of the county will be met without developing waste management facilities on Green Belt land¹⁹. The overarching need for waste management in Surrey combined with the lack of suitable alternative sites outside the Green Belt and the need to locate facilities close to sources of waste, such as households and businesses, are among the reasons why it is considered that very special circumstances may exist for allowing development within the Green Belt...’Other considerations’ which need to be weighed when determining whether VSC exist may include:

- i) The lack of suitable non-Green Belt sites;
- ii) The need to find locations well related to the source of waste arisings;
- iii) The characteristics of the waste development including scale and type of facility
- iv) The wider environmental and economic benefits of sustainable waste management, including the need for a range of sites.

Area of Outstanding Natural Beauty

6.58 National planning policy in respect of AONBs is set out in paragraph 172 of the NPPF (2019). Paragraph 172 states that ‘great weight’ should be given to conserving and enhancing AONBs, which have the highest status of protection. It reads:

“The scale and extent of development within these designated areas should be limited. Planning permission for major development will be supported in exceptional circumstances and where it can be demonstrated that the development is in the public interest, taking account of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

¹⁹ See Site Identification and Evaluation Report April 2019

- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'

6.59 **SWLP Policy 14** (Protecting Communities & the Environment) supports waste where it can be demonstrated that it would be consistent with national planning policy with respect the protected landscapes of the Surrey Hills AONB.

Restoration

6.60 In line with NPPF paragraph 204 (h), the SMP requires progressive restoration to be integrated into the management and phasing of the mineral extraction and for land to be restored in a timely way, consistent with Green Belt policy and objectives (Core Strategy Objectives 6.1 and 2 that worked land is reclaimed at the earliest opportunity and that high quality restoration and aftercare of mineral sites takes place.

7.0 POLICY REVIEW INCLUDING NEED, GREEN BELT, AONB

7.1 The recycling activities enables the recovery of recycled aggregates from the C,D&E waste stream. The current (pre Covid-19) rate of intake into Homefield is approximately 180,000tpa. Some 60% goes through the wash plant which generates over 80% variously sized recycled aggregates, the remainder being wash plant waste (largely filter cake). Of the waste which does not go through the plant, a proportion is exported as oversized concrete and planings or as screened soil in accordance with the levels imposed on the current planning permissions. The remainder goes into the landfill to progress the restoration."

7.2 Recycling activities at Homefield are in line with the SWLP objective to achieve net self-sufficiency in waste management and WFD and the national and local policies to utilise waste as a resource by 'moving waste up the hierarchy' and further improve aggregate recycling rates. In so doing they contribute to a reduction in the amount of inert waste being taken to landfill and the need for primary aggregates extraction (paragraphs 6.1 to 6.29 above).

7.3 The SWLP Spatial Strategy identifies that the need for waste management in Surrey will be provided for by safeguarding existing capacity, appropriate extensions and enhancements to

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existing facilities and the development of new facilities in suitable locations (paragraphs 6.37 to 6.39 above).

- 7.4 In terms of location Homefield is in the middle of the SWLP three-tiered hierarchy, as an ‘existing site’ within the Green Belt. This sits below sites outside the Green Belt, but above those which are likely to result in significant adverse impacts to ‘areas or assets of particular importance’ (paragraphs 6.40 to 6.41 above).
- 7.5 These applications do not seek to generate new capacity, but to sustain existing capacity for an extended period, connected with the life of the Homefield minerals permission and the outstanding restoration conditions (paragraphs 6.44 to 6.52).
- 7.6 As such, the SWLP suggests that being linked to restoration activity the proposals may fall outside the definition of ‘inappropriate’ development (paragraph 6.56 to 6.57 above).
- 7.7 This notwithstanding, if the proposals are to be considered ‘inappropriate’ there is a strong case to argue that ‘very special circumstances’ exist, sufficient to outweigh potential harm (paragraph 6.55 above).
- 7.8 The established recycling activities and associated ancillary infrastructure are linked to a minerals consent with an outstanding requirement for restoration with inert waste to be completed by 22 February 2042. The site has good access to the primary road network and is close to the urban areas of Farnham and Guildford and local sources of C,D&E waste. The co-location of recycling and landfilling operations at Homefield enables the Applicant to produce a broad range of secondary and recycled products to serve local markets, as well as recover soils suitable for the restoration of the mineral void. This arrangement avoids the ‘double handling’ of material were it to be necessary to import residual material sourced from waste recycled off-site (paragraphs 6.44 to 6.49 above).
- 7.9 Some 65% of Surrey’s recycled and secondary aggregates capacity is met on sites with temporary planning permissions. The results of SCC’s most recent annual monitoring confirm that several of these permissions will expire over the next few years with a loss of -389,000t capacity by 2025 and -834,000 by 2030. SCC predicts that the permanent and remaining two temporary sites would maintain capacity of 1.0 mtpa over the SWLP period, at least in the short to medium term (i.e. to 2027). However, the figures suggest that Homefield is included in this ongoing provision (paragraphs 6.30 to 6.36 above).

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- 7.10 As Homefield's recycling and recovery has been in operation since 2005, it is not unreasonable to assume that the capacity lost from this site would need to be picked up elsewhere whether at an existing site or a new location (paragraph 6.50 to 6.51 above).
- 7.11 The only temporary recycling permissions beyond 2022²⁰ are directly linked with the restoration of mineral sites in the north of the county and most of the existing permanent sites are situated in the north and east Surrey. The closest permanent sites to Homefield are 'Kill Copse', Shamley Green, which is in the Green Belt and 'Sunnyside', Aldershot. Both are small sites where there is no scope for expansion²¹ (paragraph 6.30 to 6.48 above).
- 7.12 The SWLP highlights the lack of new locations suitable for waste management outside the Green Belt, which covers approximately 73% of the county. The majority of the 'ILAS' are located within existing industrial sites and the SWLP acknowledges that such sites may not be forthcoming to provide an adequate and deliverable supply of sites, particularly given there are likely to be higher value commercial uses which are prioritised by the market. Those closest to Homefield are constrained by proximity to sensitive receptors and unlikely to be provide for the land take required to accommodate operations similar to those at Homefield. The closest site allocation identified in the SWLP is 'Land to the north of Slyfield Industrial Estate, Guildford' but this is earmarked for new/additional waste management capacity (SCC/Suez MRF) but is being displace in favour of residential development. Representations were made on the draft SWLP setting out the Applicant's concerns about the suitability of the former Weyland Sewage Treatment Works site allocation and the likelihood of the land being development for a Strategic Waste Use (paragraphs 6.40 to 6.43 above).
- 7.13 The lack of suitable alternative sites to Homefield is equally relevant in the context of the sites' location in the AONB (paragraph 6.58 above).
- 7.14 Section 7.0 of this Planning Statement considers the potential 'harm' to the Green Belt and 'any detrimental effect on the environment, the landscape and recreational opportunities' in the AONB associated with temporary continuation of the recycling and temporary retention of ancillary buildings and infrastructure. HGV movements are well below historic levels, albeit that there is no restriction on movements associated with the landfilling operations. Noise and dust emissions are controlled and regulated by virtue of existing planning conditions and the environmental permitting regime. Visually the site is well screened and the temporary impact on the landscape

²⁰ West of Queen Mary Reservoir and Stanwell Quarry (LAA 2020)

²¹ SWLP Site Identification and Evaluation Report, April 2019

character will continue to diminish as the site is being progressively restored in accordance with the approved scheme for the whole site (paragraph 6.60).

- 7.15 The site has planning permission to 2042. Based on current (pre COVID) rates of intake of approximately 180,000 tpa the site could be completed by 2032. Continuation of recycling activities would extend the restoration by approximately 9 years which in the context of the 2042 date is not a significant delay in the restoration from the perspective of local amenity, the Green Belt or the AONB (paragraph 6.60).
- 7.16 The proposal is to maintain the current level of activity and the existing facilities and associated bunds. SCC previously agreed the positioning of Plant and ancillary buildings and infrastructure and this has not changed (Planning History and Section 8 of this Statement)
- 7.17 Whilst there will be some additional limited impact on openness connected with the proposed extensions of time, this should be viewed in the context of the extant minerals permission to 2042 and achievement of the purposes of the Green Belt designation upon restoration of the site (paragraph 6.45 above).
- 7.18 The need for ongoing recycling capacity has been demonstrated, as an existing operational landfill and given the lack of suitable alternative sites the proposal meets the locational requirements set out in the SWLP and impacts on the community and environment can be controlled within acceptable levels (section 8.0 of this Statement).
- 7.19 It is concluded that the AONB policy tests are met and should the proposals be deemed 'inappropriate', 'very special circumstances' exist to outweigh the harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal (paragraphs

8.0 LOCAL COMMUNITIES AND THE ENVIRONMENT

Protecting Communities and the Environment

- 8.1 **SMP Policy MC14** and **SWLP Policy 14** Protecting Communities & the Environment, provides guidance on protecting the environment and the amenities of local communities.
- 8.2 Part A of Policy 14 states that:

“Planning permission for waste development will be granted where it can be demonstrated that it would be consistent with relevant national planning policy with respect to the following key environmental assets:

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- i) The protected landscapes of the Surrey Hills AONB, the High Weald AONB, the South Downs National Park, and the Kent Downs AONB.
- ii) Sites of international or European importance (SPA, SAC, Ramsar) for biodiversity, or of national importance (SSSI, NNR) for biodiversity or geodiversity where those are located within the county or could be affected by development located within the county.
- iii) Nationally important heritage assets, including Scheduled Monuments, Listed Buildings, and Registered Parks & Gardens where those are located within the county or could be affected by development located within the county.

8.3 Part B of Policy 14 is focused on the prevention of unacceptable impacts on the communities and the environment. The policy supports proposals where it can be demonstrated that:

“It would not result in unacceptable impacts on communities and the environment. The term ‘unacceptable impact’ should be interpreted in accordance with current national and local planning policy and planning guidance relevant to each of the following matters:

- i) Public amenity and safety including:
 - a) Impacts caused by noise, dust, fumes, odour, vibration, illumination.
 - b) Impacts on public open space, the rights of way network, and outdoor recreation facilities (including on the accessibility of such spaces, networks and facilities).
- ii) Aerodrome and airport safeguarding, including the risk of birds striking aircraft and including impacts due to the position or height of buildings and associated structures.
- iii) Air Quality, including impacts on identified Air Quality Management Areas and Clean Air Zones.
- iv) The Water Environment including:
 - a) Flood risk, (arising from all sources), including impacts on, and opportunities to provide and enhance, flood storage and surface water drainage capacity.
 - b) Water Resources, including impacts on the quantity and quality of surface water and ground water resources, taking account of Source Protection Zones, the status of surface watercourses and waterbodies and groundwater bodies.
- v) The landscape including impacts on the appearance, quality and character of the landscape and any features that contribute to its distinctiveness, including character areas defined at the national and local levels.
- vi) The natural environment, including biodiversity and geological conservation interests, including site of local importance (LNR, SSSI, RIGS) for biodiversity or geodiversity, irreplaceable habitats (e.g. Ancient Woodland), and protected species).

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- vii) The historic landscape, on sites or structures of architectural and historic interest and their settings, and on sites of existing or potential archaeological interest or their settings.
- viii) Land and soil resources including impacts on their use, quality and integrity and including opportunities for remediation, the need to protect any best and most versatile agricultural land, and the need to address existing and potential contamination and land stability issues.
- ix) Cumulative impacts arising from the interactions between waste developments, and between waste development and other forms of development.
- x) Any other matters relevant to the proposed development.”

8.4 **SWLP Policy 15** – Transport and Connectivity support proposals where it can be demonstrated that:

- i) Where practicable and economically viable, the development makes use of rail or water for the transportation of materials to and from the site.
- ii) Transport links are adequate to serve the development or can be improved to an appropriate standard.

Where the need for road transport has been demonstrated, the development must ensure that:

- i) Waste is able to be transported using the best roads available, which will usually be main roads and motorways, with minimal use of local roads, unless special circumstances apply.
- ii) The distance and number of vehicle movements associated with the development are minimised.
- iii) The residual cumulative impact on the road network of vehicle movements associated with the development will not be severe.
- iv) There is safe and adequate means of access to the highway network and the vehicle movements associated with the development will not have an unacceptable impact on highway safety when compared against current national and local guidance.
- v) Satisfactory provision is made to allow for safe vehicle turning and parking, manoeuvring, loading, electric charging and, where appropriate, wheel cleaning facilities.
- vi) Low or zero emission vehicles, under the control of the site operator, are used which, where practicable, use fuels from renewable sources.

Environmental Permitting and Pollution Control

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- 8.5 The supporting text to Policy 14 notes that some impacts on the environment and amenity, in particular effects on air, land and water, are also subject to control by regulatory regimes other than the planning system (e.g. the Environmental Permit regime and local environmental health controls).
- 8.6 Homefield operates in accordance with the Environmental Permits referenced in Section 4 of this statement. The NPPF is clear that planning decisions should focus on the acceptability of the use of land rather than pollution control regimes which, it should be assumed, will operate effectively. NPPF (paragraph 183) confirms that:
- “The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.”
- 8.7 The subsequent paragraphs set out how the submitted proposals accord with national and local planning policies and the requirements of the environmental permitting regime.

HIGHWAYS AND TRAFFIC

- 8.8 Opportunities to transport minerals and waste materials other than by road are very limited in Surrey.
- 8.9 Construction, demolition and excavation (C,D&E) waste is a bulky, low value material which is heavy and therefore expensive to transport, so the location of recycling facilities needs to be close to sources of waste and potential markets. Homefield is close to the Farnham/ Aldershot/ Farnborough conurbation and Guildford. With its existing dedicated access from the north off Guildford Road (C119) linking to the A31 to the north west, Homefield is well placed in relation to the primary road network and main urban areas of Farnham and Guildford.
- 8.10 Current HGV movements are well below historic levels when traffic was generated from both Homefield and Chamber’s neighbouring ‘Jolly Farmer’ site. Similarly, at one time these sites operated concurrently with other mineral and waste facilities close by, generating HGV movements onto the A31 and wider network. These facilities have closed or are coming to end.
- 8.11 There are no HGV movement restrictions on the Homefield permissions other than in connection with the waste importation limits imposed by the Environmental Permits. It is anticipated that the

future annual waste importation and associated HGV movements will continue at a similar to those of recent years (pre Covid 19) and will be well within the Permit limits.

- 8.12 Based on an annual waste importation rate of 180,000tpa, the site would generate approximately 122 two-way HGV movements for all permitted activities at the site (recycling and landfilling). This takes account of the limitations attached to current permissions on the export of screened soils and oversized concrete etc as well as for some 'backhauling' of the oversized concrete for processing at Chambers' site in Aldershot. Based on the same rates of importation the site would generate 80 two-way HGV movements for landfill activities only.
- 8.13 Based on current rates of recycling and landfilling activities combined and taking account of the need to create a safe slope (batter), it is anticipated that it will not be necessary to encroach into the Plant Area/final phase until beyond 2030.
- 8.14 Within the site there is adequate for vehicle turning and for wheel and chassis cleaning prior to vehicles exiting the quarry. There is on-site parking for up to 8 lorries and a workshop which enables the ongoing repair and maintenance to a high standard and helps to reduce unnecessary movements on the local road network.

Compliance with Planning Policy

- 8.15 The proposals meet the requirements of NPPF (paragraph 108 and 109), **SMP Policy MC15** and **SWLP Policy 15** in that a safe and suitable access to the site exists for all users and they would not have an unacceptable impact on highway safety or give rise to severe residual cumulative impacts on the road network. Satisfactory provision is made for manoeuvring and wheel cleaning facilities within the site.
- 8.16 In accordance with **SMP Policy MC15** and **SWLP Policy 14** the proposals would not have an adverse effect on local amenity and the local environment or result in significant adverse impacts in respect of "vi) public open space, the rights of way network, and outdoor recreation facilities."
- 8.17 Homefield is an operational mineral site with planning permission for recycling and landfilling, with no restriction on highway movements. As no change is proposed to the current permitted throughput of material at the site, there would be no additional impact in transportation terms associated with the continuation of recycling and landfilling activities for a further 10 years.
- 8.18 The proposals are in accordance with the NPPF, SMP Policies MC14 and MC15, SWLP Policy DC3.

DUST AND AIR QUALITY

- 8.19 In respect of air quality, the site is located some 2.9 kilometres to the east of the Farnham Air Quality Management Area (AQMA) on the north side of the A31. HGVs associated with Homefield do not pass through AQMA. The Applicant's fleet of vehicles are all Euro VI compliant models, so helping to reduce emissions.
- 8.20 In relation to dust emissions, sand extraction has ceased and the recycling washing plant is a 'wet' process. The potential sources of dust emissions are from vehicle movements and the landfilling and screening operations. The topsoil screening is a dry process but it takes place at base of the quarry void and ceases during dry and windy periods.
- 8.21 Planning conditions and permitting requirements are already in place to control dust emissions. The measures currently employed on site mitigate any adverse dust impacts which might arise in respect of the movement of the waste materials on site and the transport of recovered waste off site and the permitted operations have continued without complaint.
- 8.22 Conditions 7 and 8 of planning permissions WA04/1876 (soils recycling) and WA09/0856 (washing plant) require internal roads and other parts of the site to be dampened down with water on a regular basis and for vehicles to pass through the chassis and wheel cleaning facility (planning permission ref: WA08/1848) prior to exiting site. Storage bays are to be operated in a manner to avoid the emission of dust, such as limiting drop heights (Condition 7 of planning permission ref: WA08/1848 (storage bays)).
- 8.23 The Applicant is required to take appropriate measures to abate any problems should any dust related nuisance occur beyond the boundaries of the site (for example due to adverse weather conditions).

Dust Monitoring

- 8.24 Dust monitoring is undertaken quarterly in accordance with Condition 2.2.4.3 of the Environment Permit No. FP3235PA and the reports submitted to the EA.
- 8.25 The monitoring locations were reviewed and updated in 2012 to take into account regrading works at the site. The dust concentrations recorded are compared with the site emission standard of 2.0 mg/m³ at the site boundary set (as prescribed in Table 2.2.9 of Condition 2.2.4.3 of the Permit). The four monitoring exercises undertaken between April-October 2019 recorded dust concentrations well below this EA emissions standard.

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Compliance with Planning Policy

- 8.26 The proposals do not involve any increase in HGV movements and will not affect an AQMA. The Applicant operates its own fleet of HGVs compliant with up-to-date Euro emissions standards.
- 8.27 Best practice measures and planning conditions are in place to ensure that any unavoidable dust and particle emissions are controlled, mitigated or removed at source (Section 17, paragraph 205 (c) of the NPPF) and regular monitoring is undertaken.
- 8.28 It is anticipated that there will not be any significant adverse effects arising from the temporary continuation of the recycling activities either alone or in combination with the landfilling operations in accordance with the **NPPF**, **SMP Policy MC14** and **SWLP Policy 14**.

NOISE AND VIBRATION

- 8.29 The potential sources of noise emissions are from vehicle movements and the landfilling and screening and washing activities which largely take place at the base of the quarry void.
- 8.30 Homefield is an established site and will continue to operate in accordance with the noise thresholds stipulated in Conditions 4, 8 and 9, and 10 and 11 respectively of planning permissions WA11/0009 (workshop), WA04/1876 (soils recycling) and WA09/0856 (screening and washing of inert waste).
- 8.31 The on-site workshop contributes to the maintenance of environmental standards, especially in terms of limiting noise and emissions from the plant used on site. The building is fully clad and has a door that can be shut during noisy operations.
- 8.32 Noise arising from the workshop building, from the recycling activities or from the use of the washing plant is not to exceed 50 LAeq (1/2 hour) when measured at, or recalculated at, a point less than 3.5m from façade of any noise sensitive building (Condition 4 of WA11/0009, Condition 8 of WA04/1876 and Condition 9 of WA09/0856).
- 8.33 Condition 9 of WA04/1876 prevents crushing on site of concrete hardcore or tarmacadam recovered from the recycling operation. Bituminous materials (e.g. road planings) and oversized materials are taken off site for crushing.
- 8.34 Condition 11 of WA09/0856 provides for good driving and operating practices when loading product into the storage bays.

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Compliance with Planning Policy

- 8.35 In accordance with Section 17, Paragraph 205 (c) of the **NPPF**, **SMP Policy MC14** and **SWLP Policy 14** planning conditions are already in place to control noise emissions so that any unavoidable noise emissions are controlled, mitigated or removed at source.

LANDSCAPE AND VISUAL IMPACT

- 8.36 SCC previously concluded that the current activities, Plant and infrastructure were acceptable in terms of landscape and visual amenity.
- 8.37 The site is visually well screened by existing vegetation so protecting the visual amenity of residential properties close to the boundaries of the site. Within the site, the Plant and buildings are positioned in the bottom or near the base of the void and cannot be seen from beyond the site other than potentially glimpse views through vegetation from local vantage points.
- 8.38 The proposals should be viewed in the context of the existing permission for minerals extraction and restoration until February 2042 and the temporary impact on the landscape character will continue to diminish as the site is being progressively restored in accordance with the approved scheme for the whole site.

Compliance with Planning Policy

- 8.39 Given the nature of the site and the degree of concealment for the proposals would have a negligible visual impact and negligible impact on landscape character and quality and the AONB. Therefore, the proposals comply with the **NPPF** and **SWLP Policy 14**.

NATURE CONSERVATION

- 8.40 The site is not located close to any areas of land designated as being importance for nature conservation purposes at the European or international level Given the geographical separation of the site from the closest nationally or locally important nature conservation designations it is concluded that no adverse impacts on those areas would arise from the proposed developments. Therefore, the proposals comply with the **NPPF** and **SWLP Policy 14**.

HERITAGE AND ARCHAEOLOGY

- 8.41 Given the geographical separation of the site from the closest heritage assets it is concluded that no adverse impacts on those designations would arise from the proposed developments.

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8.42 Any archaeological interest within the site would have been addressed as part of the former mineral extraction.

8.43 Therefore, the proposals comply with the **NPPF** and **SWLP Policy 14**.

HYDROLOGY

Surface Water/Flood Issues

8.45 There is an approved scheme for the control of surface water in connection with the landfilling operations.

8.46 The Environmental Permits stipulate conditions for the storage of inert wastes within the site and controls to prevent emissions into surface waters or groundwater. Groundwater monitoring must be undertaken in accordance with the permit and the results submitted to the EA. Landfill gas and leachate are not produced by the permitted inert wastes, however, as a precautionary measure, monitoring for fugitive emissions²².

8.47 Therefore, there are adequate controls through planning conditions and the permitting regime to protect water and prevent surface flooding. The proposals comply with the **NPPF** and **SWLP Policy 14**.

²² A fugitive emission means an emission to air, water or land from the activities which is not controlled by an emission background concentration limit. In relation to this site it does not include odour, noise and vibration.

9. CONCLUSION

- 9.1 On behalf of the Applicant Chambers Runfold PLC permission is sought for a temporary extension to the end date for the existing inert waste recycling activities (planning permissions ref: WA04/1876 and WA09/0856) and retention of associated, ancillary buildings and infrastructure (planning permissions ref: WA11/0009, WA10/2109, WA10/2108 and WA08/1848) at 'Homefield', Runfold, Surrey, under s73 of the Town and Country Planning Act 1990. These proposals include minor amendments to other related planning conditions.
- 9.2 Homefield has extant permission for mineral working, but as the sand reserves are now exhausted extraction has ceased. The site operates as an inert waste recycling facility and is undergoing restoration to agriculture through infilling with imported materials in accordance with planning conditions and permitting requirements. The site is to be fully restored by 22 February 2042.
- 9.3 Homefield's recycling and recovery has been in operation since 2005. The Applicant imports construction, demolition and excavation waste, which is processed to produce secondary aggregates, including a construction sand. Non-recyclable, residual wastes are disposed of within the landfill.
- 9.4 This infrastructure makes a vital contribution to helping SCC achieve its aim to be net self-sufficient in the management of its waste, utilise waste as a resource and achieve the Surrey Waste Local Plan recycled and secondary aggregates.
- 9.5 These current applications are linked to the 2042 minerals permission and the delivery of the sites' restoration back to agriculture in accordance with the approved restoration scheme. A temporary extension of 10 years (to 2030) will ensure the existing recycling capacity is safeguarded while the restoration is ongoing. The workshop/extension, lorry parking and storage bays are ancillary and fundamental to the ongoing restoration of the site and so it is proposed to retain these until restoration is complete (2042).
- 9.6 These proposals are for the continuation of current operations. They meet the waste management and locational criteria set out in national and local planning policies and have been addressed in respect of need and the site's situation in the Green Belt and AONB. They are time limited in the context of the progressive restoration of the former mineral working which has consent to February 2042. Planning conditions, the permitting regime and best practice measures will enable operations to be ongoing without unacceptable impacts on local communities and the environment.

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- 9.7 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which applies both to plan-making and decision-taking. The NPPF reinforces the plan led system as the starting point of decision taking and unless material considerations indicate otherwise, development proposals which accord with the Development Plan are to be approved without delay.
- 9.8 It is concluded that the proposals comply with the requirements of the Development Plan and that the proposed 's73 amendments' should be approved.

