

Development Control Committee

23rd January 2017

Application Number: CM/23/16

Title: Northern Extension to existing sand and gravel extraction

Site Location: New Denham Quarry, Denham Road, Denham
Buckinghamshire UB9 4EH

Applicant: Summerlease Ltd

Author: Head of Planning & Environment

Contact Officer: Andrew Sierakowski dcplanning@buckscc.gov.uk

Contact Number: 01296 380000

Electoral divisions affected: Denham

Local Member: Roger Reed

Summary Recommendation(s):

The Development Management Committee is invited to **APPROVE** application number CM/23/16 in accordance with the conditions set out in Appendix A to this report.

Appendices: Appendix A: Draft Conditions



INVESTOR IN PEOPLE



Introduction

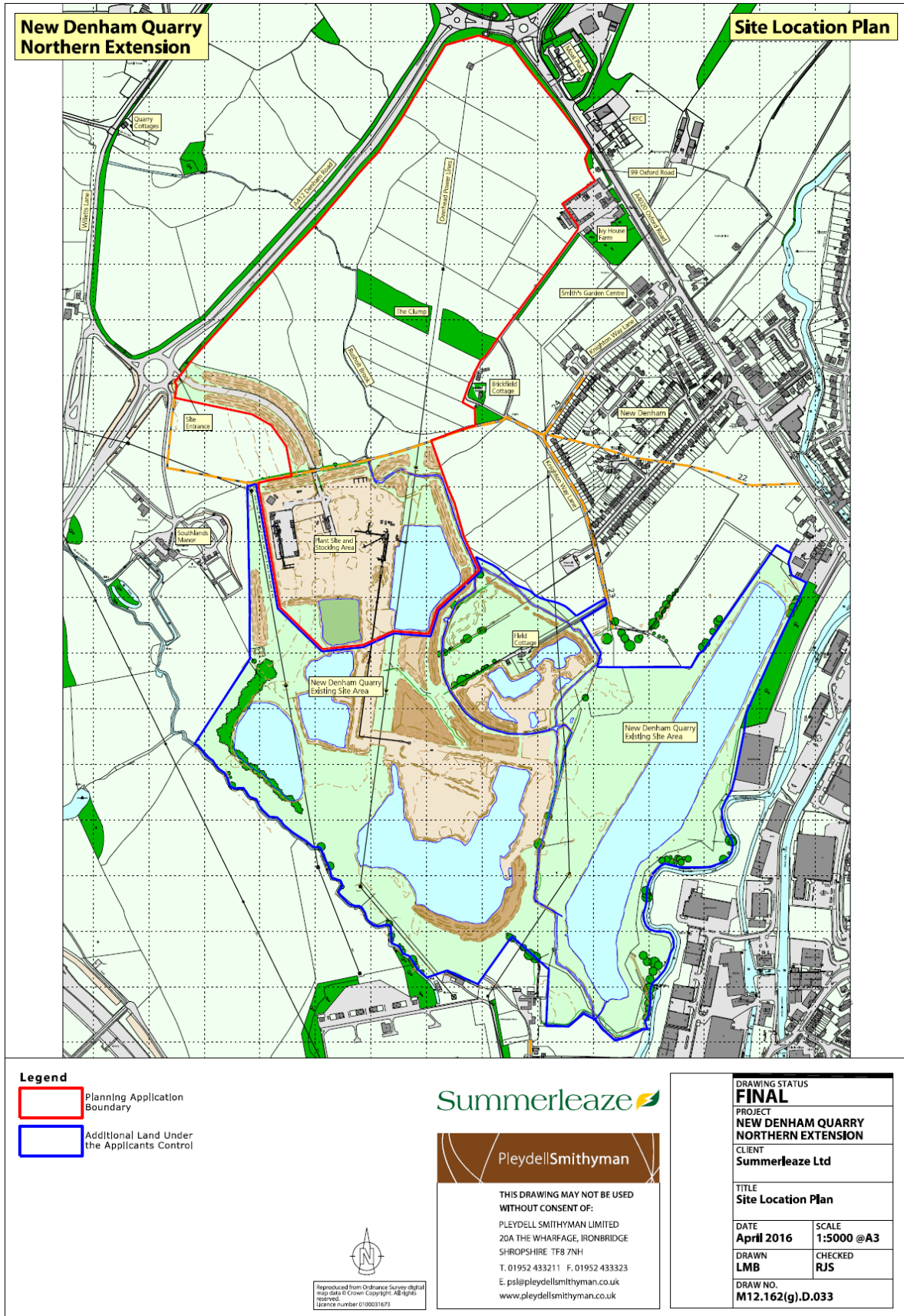
1. This application is submitted by the Stephen Bowley Planning Consultancy on behalf of Summerleaze Ltd. It was validated on 28th June 2016 and sent out for consultation on the same day. The application was advertised by site notice, neighbour notification and newspaper advertisement.
2. Following the initial round of consultation, the applicant was invited to respond to the comments of statutory consultees, including requests for additional information, and consequently submitted a number of further documents, with selective additional consultation undertaken in response to those additional submissions.
3. The target for determination of this application was originally the 27th September 2016. A request for an extension of time was made to the applicant which has been agreed to the 27th January 2017, to allow further time for the receipt of responses from statutory consultees.
4. In determining this planning application, the County Planning Authority has worked with the applicant in a positive and proactive manner based on seeking resolutions to problems arising in relation to dealing with the planning application by liaising with the applicant, agent and statutory consultees and discussing changes to the proposal or requesting additional information where considered appropriate or necessary. This approach has been taken in accordance with the requirements of the National Planning Policy Framework (NPPF) and as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015. The applicant has, in the course of the determination of the application, provided additional information, responded to comments raised by statutory consultees and engaged in dialogue in relation to matters related landscaping, trees, ecology, footpaths, phasing and operational details of the development.

Site Description

5. The site is located on land to the southwest of New Denham and west of Uxbridge and is currently accessed off the A412 Denham Road, to the south of the M40, Junction 1. The location of the Site is shown on Figure 1 below
6. The planning application area (i.e. the red line area) is approximately 40.5ha. It includes an extraction area to north of the existing quarry at New Denham of approximately 24.3ha, the existing plant site and quarry lagoons of approximately 8.4ha, 3.8ha of buffer zones and margins and 4.0ha of the existing quarry access which is to be retained.
7. The additional land for mineral working lies to the north of Footpath 25 (which runs between New Denham and Southlands Manor) and is bounded by the A412 (Denham Road) and A4020 (Oxford Road). The land within the extension area is mainly used as grazing for a horse livery and a grass crop, but contains a block of woodland known locally as 'The Copse' (identified in the application as 'The Clump'). The land forms part of Buckinghamshire County Council's smallholding estate and is occupied by tenant farmers based at Ivy House Farm and New House Farm. These tenancies will cease upon the grant of a minerals lease to Summerleaze Ltd, although it is understood that Ivy House farmhouse will remain in residential use. The County Council will retain ownership of the land during and after mineral extraction and restoration.
8. The nearest residential properties are:

- Ivy House Farm and 99 Oxford Road on the north-eastern site boundary;
- Brickfield Cottage on the south-eastern site boundary;
- Properties along Oxford Road (A4020) to the north including Moat Place; and
- Southlands Manor to the west of the plant site.

Figure 1: The Site



9. The main built up area of New Denham including Knighton Way Lane lies to the east of the site, from which it is separated by 150-200 metres of agricultural land. Nearby commercial properties in Oxford Road include Smiths Garden Centre and KFC.
10. The land affected by the northern extension is generally flat but lies outside of the flood plain (Zones 2 & 3). It is crossed by the Rusholt Brook which flows intermittently in a north to south direction. The site contains a rectangular block of woodland (the Copse) and a number of hedgerows within and on the perimeter of the site. An electricity line crosses the site from the electricity sub-station to the south of the existing quarry. Two pylons are located within the proposed northern extension and the line crosses the Copse.
11. Footpath 25 is located on the southern boundary of the proposed extraction area, but no rights of way will be directly affected by the proposed mineral extraction. Footpath 25 is crossed by the existing quarry access road, where a controlled crossing is provided (footpath users press a button to close the gates). An additional road crossing will be required to access the northern extension and similar provision will be made. The ground conveyor will pass beneath the path.
12. There are two other Public Rights of Way (PRoW) in the vicinity of the Site; Footpath DEN/23/1 which runs to the east of the application site leading from Knighton-Way Lane to Field Cottage; and Footpath DEN/22/1 to the south east of the application site leading from Knighton-Way Lane to Oxford Road.
13. The site lies within the Metropolitan Green Belt but is otherwise not covered by any other statutory landscape or ecological designations.

Surrounding Area

14. The site lies on the western outskirts of Uxbridge. The landscape is generally flat and has a rural-urban fringe character due to it being in close proximity to the urban edge of Uxbridge.
15. The existing New Denham Quarry within which part of the application falls, is currently an operational quarry and is partially restored in accordance with approved plans attached to the minerals planning permission (SBD/8201/06, CM/32/14).
16. The current application includes the existing quarry plant site and lagoons, as approved under planning permissions SBD/8201/06 and CM/32/14. The area within the red line boundary of the existing quarry redline boundary extends to 60.3ha).
17. The existing quarry comprises an irregular shaped parcel of land located in South Bucks District. It is being progressively worked for sand and gravel and restored in phases to create three (eastern, central, and western) lakes, nature conservation areas and provision for recreation through utilising imported inert materials to backfill worked areas. At present, the area to the south of Field Cottage is being worked and approximately the southern third of the main central lake has been excavated. The eastern lake and the western lake have already been restored.
18. The existing quarry includes areas partially restored to wildlife meadow, lakes, tussocky grassland, trees, shrubs and woodland. The restored areas enhance the openness and character of this site which at present is influenced and detracted from by the urban edge of Uxbridge to the east of the site, the residential fringe of New Denham to the north and the National Grid substation (Iver) to the south of the site. From the substation to the immediate south of the site there are three overhead

power lines radiating out to the north through the existing quarry site which also detract, to a degree, from its openness.

19. As stated above the site lies within the Metropolitan Green Belt, but also within the Colne Valley Regional Park (CVRP), and is a Biodiversity Opportunity Area. Additionally, the Kingcup Meadows & Oldhouse Woodland Site of Special Scientific Interest (SSSI) lies approximately 200 metres to the north-west of the proposed development (at its closest point) and a Grade II listed building (Southlands Manor and Barn to North East of Southlands Manor) is located to the west of the site adjacent to the site access.
20. Land on the eastern side of the River Colne opposite the site forms part of a 'Site of Borough Importance' for nature conservation within the London Borough of Hillingdon (Uxbridge Moor).
21. The whole of the site is located within the BCC mineral safeguarding area for sand and gravel.
22. In relation to minerals requirements the proposed extension of mineral extraction contains an estimated 1.6 million tonnes of sand and gravel reserves.

Existing Quarrying Operations on the Site

23. Figure 1 shows the current situation at the existing quarry as of April 2016. Extraction is currently taking place south of Field Cottage. Some areas of the site have already been restored in accordance with the approved restoration scheme, namely the small lake to the west and the linear (rowing) lake in the eastern part of the site. As at 14th April 2016, approximately the southern third of the main central lake had been extracted and various soil bunds are located around the site. Working in this area continued throughout 2016.
24. The northern part of the site will continue to be operated for gravel extraction and will be progressively restored under the existing permission. The southern end of the site is currently undergoing restoration, following the end of active gravel abstraction. The approved New Denham Quarry restoration scheme (including Phase 4 C, CM/32/14) as shown in Figure 2, comprises three lakes of varying sizes. On the east side of the existing quarry is a long, linear lake of approximately 7.9ha (17.5 acres) and a maximum depth of 5 metres. In the middle of the site is a larger lake of approximately 10.12ha (25 acres) with a maximum depth of 5 metres. To the west of the existing quarry is a smaller lake of approximately 1.4ha (3.5 acres). In between the lakes, a mix of predominantly dry broadleaved woodland, biomass production woodland, and tall tussocky grassland is proposed, through which a number of footpaths will pass connecting with the wider PRow network.
25. The original application for the existing quarry (approved under application SBD/8201/06) states that the restoration scheme has been designed for a recreational afteruse including the potential for sailing on the largest central lake, and rowing on the long thin lake parallel to the River Colne. Furthermore, at that time, an illustrative plan was submitted showing how the site could be developed to achieve such uses, although this was not a part of the planning consent.
26. The proposed development will modify the currently approved consent with retention of the existing plant site and lagoons within the existing quarry until the end of the extraction in the proposed northern extension.

EIA

27. An Environmental Statement has been submitted with the application so it is to be treated as 'EIA' development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

Site History

28. The planning history of the existing quarry is covered by a number of planning permissions for minerals development and restoration schemes described above and shown in Table 1.

Table 1: Planning History

Application No.	Development	Decision	Description
SBD/8201/06	Extraction of sand and gravel and erection of concrete batching plant at Land South West of New Denham, Denham Road, Uxbridge, Buckinghamshire, UB9 4EH	Application Approved March 2007	The extraction of sand and gravel and the restoration of the site to lakes (in a form suitable for eventual mixed use for amenity, nature conservation and recreation) incorporating the importation of inert filling materials; the provision of a plant area including the erection of a mineral processing plant, weighbridge and office, workshop, fuel tanks, power supply equipment, canteen and concrete batching plant; the erection of ground conveyors and the construction of a new access onto the A412
11/01460/CM	Phases 3E and 4	Application Approved June 2011	Variation of approved Scheme of Working and Restoration to allow working within Utilities Corridor and Six Acre Farm Buffer Zone and restoration to land using recovery materials
CM/32/14	Phase 4C (Field Cottage Extension)	Application Approved March 2014	Extension into Field Cottage buffer area for the extraction of sand and gravel reserves and restoration to land using quarry overburden and recovery materials

29. Planning Permission for the extraction of sand and gravel and the erection of a concrete batching plant at New Denham was granted to Summerlease Ltd by Buckinghamshire County Council in March 2007 (Ref SBD/8201/06). Two extensions have subsequently been permitted:
- i. The variation of planning conditions to work excluded areas within the permitted site (Ref 11/01460) granted on 9 September 2013; and
 - ii. The extension into the Field Cottage buffer area (Ref CM/32/14) granted on 10 June 2014.
30. The development commenced in 2008, including the construction of a new access roundabout from the A412 and the establishment of the plant site and concrete batching plant. Mineral extraction commenced towards the end of 2008 and New Denham Quarry is now the principal source of high quality sand and gravel in south Buckinghamshire.
31. Working and restoration to amenity lakes and woodland is taking place progressively. Extraction is presently continuing in Phase 4. Phases 2A and 3 have been restored as lakes. The remaining permitted reserves, excluding the plant site area, are sufficient for a further 2½ years of extraction at current extraction rates. The northern extension is required to enable mineral extraction to continue for an additional 6 years.
32. The extraction area of the proposed northern extension is located to the north of Footpath 25 (between Southlands Manor and New Denham) and bounded by the A412 (Denham Road) and A4020 (Oxford Road). It is proposed to restore the site to agricultural use following infilling with inert materials. The quarry plant site, including the concrete batching plant, would remain in its present location with sand and gravel being transported by ground conveyor.
33. The northern extension site is not within a 'Preferred Area' for sand and gravel extraction in the current Minerals and Waste Local Plan (2004 – 2016) Adopted in June 2006. The Plan identified the existing quarry site which has since been permitted and worked. Further extensions to the existing quarry would have been considered in a subsequent review of the Minerals Plan, but this has been delayed.
34. The County Council adopted a Minerals and Waste Core Strategy in 2012. This provides the general minerals policies, but does not allocate additional sites. These are to be included in the forthcoming Minerals and Waste Local Plan, but this has been delayed. The northern extension site has been put forward by the applicant for inclusion in the Plan.

Hillingdon Outdoor Activity Centre Proposal (HOAC)

35. A separate planning application was submitted by HS2 Ltd to relocate the Hillingdon Outdoor Activity Centre (HOAC) from near Harefield to New Denham Quarry ("The HOAC Application"). This is necessary because the existing HOAC site is on the proposed route of HS2 and cannot continue to operate there. The HOAC Application involves amendment of the existing approved quarry restoration scheme and includes a small extension to the east side of the approved mineral extraction scheme. The HOAC application remains under consideration and an Officer's report will be presented at a future meeting of the Development Control Committee. Members are advised that this application must be determined in its own right and should not have regard to any future decision on the HOAC Application. The two

schemes are discrete developments, although with overlapping boundaries, but the determination of one should not be dependent on the determination of the other.

Proposal – Overview

36. The application site has an area of 40.5Ha comprising:
- (i) 24.3 ha additional extraction area;
 - (ii) 3.8 ha of Buffer Zones/Margins;
 - (iii) 8.4 ha encompassing the existing plant site; and
 - (iv) 4.0 ha comprising the existing site access.
37. A minerals assessment has been carried out including a borehole survey (included in the Environmental Statement hydrology report). It is estimated that the Northern Extension contains 1.6 million tonnes of sand and gravel. The sand and gravel would be extracted at a forecast rate of 250 – 300,000 tonnes per annum over a period of 5 – 6 years. Extraction would follow on from the completion of extraction within the presently consented area of the existing quarry (excluding the reserves remaining under the plant site). It is anticipated that these permitted reserves will be worked out during 2018. Extraction is therefore expected to commence in 2018 and continue until 2024. After the end of extraction, further two years will be required to complete infilling and restoration.
38. In the event that the HOAC Scheme proceeds the life of the site may need to be extended by approximately one and a half years, but this would be the subject of a future planning application and is not for consideration as part of the current scheme.

Need

39. In relation to need the applicant presents detailed argument. This is based on the information on aggregates supply in Buckinghamshire contained in the County Council's Local Aggregates Assessment (LAA) for 2015. This includes information on permitted reserves up to 31 December 2014.
40. The applicant's statement identifies that as at the 31st December 2014 permitted sand and gravel reserves were 10.07 million tonnes (mt) with ten year 10 year average sales being 0.85 million tonnes, giving a landbank of 11.8 years.
41. The above figures take into account the relatively recent permissions for new quarries at George Green, near Slough, and Denham Park Farm, east of the M25. They also include the permission for the most recent extension to New Denham Quarry (the Field Cottage extension) granted in June 2014. The permitted and operational Springfield Farm site (Beaconsfield) is also identified as having large reserves but a production limit and that it serves different markets to river valley sand and gravel.
42. The applicant's need statement states that the present landbank (at the time of submission in mid-2016) was approximately 8.8 million tonnes on the basis that approximately 1.27 million tonnes would have been extracted since 31 December 2014. Applying the latest published 10 year average sales of 0.85mt the landbank by mid-2016 will have decreased to 10.35 years. However, the need statement also states that if the annual apportionment figure in the Adopted Minerals and Waste Core Strategy 2012 is used instead (1.05 million tonnes) the landbank is reduced to

8.4 years, which it is argued, provides a better indication of future demand since the 10-year average sales figure is over influenced by the economic downturn since 2008. The rationale for using this figure, it is stated is reflected in the Quarries at East Burnham and Denham Park Farm, shown as inactive in the LAA, having since opened, thereby increasing production. It is argued that in the past 2-3 years there has been a general increase in construction activity. It is also stated that there are a number of significant infrastructure projects in the pipeline in the area, including HS2, Western Rail Access to Heathrow and the M4 Smart Motorway Scheme, that are likely to increase local demand. Consequently, whilst the landbank would still be above the minimum requirement of 7 years, it is not excessively so, and has reached a point where the County needs to be considering permitting additional reserves.

43. The statement refers to the NPPF (National Planning Policy Framework 2012) which quotes saying that landbanks are to be treated as an indicator of the security of aggregates supply. Other considerations are the need for a steady and adequate supply of aggregates taking into account local considerations such as the productive capacity of existing sites and distribution of permitted reserves.
44. The statement refers to the Local Aggregates Assessment 2015 as identifying that New Denham Quarry was (and remains) one of only two long term active quarries in Buckinghamshire at the end of 2014, and that although Denham Park Farm quarry has since opened, but produces is a different material and serves a different market area. It is also stated that a substantial proportion of the permitted reserve is tied up at the other large operational site (Springfield Farm) which has a production limit.
45. It is stated that the existing permitted reserves at New Denham Quarry are sufficient for approximately 2½ years and that it is the principal source of high quality sand and gravel in south Buckinghamshire, which supplies the on-site concrete batching plant.
46. It is argued that there is a need to grant further extensions to New Denham Quarry to maintain production of sand and gravel, and concrete. The Northern Extension would provide reserves for a further 6 years. In the event that the HOAC Scheme progresses both extensions would secure a long-term quarry life of approximately 10 years – which it expected to be a period of expected economic growth with major local infrastructure projects.
47. In summary, the applicant argues that in the context of national planning policy and guidance that:
 - The proposed quarry extension will maintain a supply of aggregates to an established market from this site and therefore help maintain a steady and adequate supply of aggregates from south Buckinghamshire;
 - There is a significant demand for aggregates in the area as a consequence of the general economic upturn in the last two years, and for major infrastructure projects in the pipeline. These are not reflected in the latest Local Aggregates assessment;
 - The reserves are a high quality river valley deposit with a high proportion supplying the on-site concreting plant; and that
 - The extension would have significant economic and sustainability benefits through the retention of jobs and continuing use of existing plant and infrastructure.

48. It is argued that whilst the landbank is above the minimum level of 7 years, it is not significantly so and there is no maximum landbank level. It is therefore argued that the application merits approval, in order to maintain the supply of aggregates over the next 8 years with additional permitted reserves being required to maintain production in the short term. There is therefore a strong case on need grounds to permit the application.

Working Scheme

49. The site would be worked in four main phases of extraction in the extension area, with an additional area of extraction, as a fifth phase, under the existing plant site, and a final, sixth phase of restoration. In summary, these would be undertaken as follows:
- (i) Extraction would commence in Phase 1 to the west of the Rusholt Brook and then continue into Phases 2 – 4 east of the Rusholt Brook in a clockwise direction. The Rusholt Brook will be retained on its present alignment within an undisturbed corridor. After this the final area to be extracted will be the plant site which has permission for sand and gravel extraction under the existing consent.
 - (ii) To protect the amenities of residential properties including Ivy House Farm, Brickfield Cottage and along Oxford Road buffer zones would be provided together with soil bunds. The bunds have a minimum height of 3-5 metres and would be seeded with grass. These measures are based on the recommendations contained the noise and amenity assessments submitted as part of the Environmental Statement.
 - (iii) Topsoil and subsoil would first be stripped and either stored temporarily in screening bunds on the site perimeter or directly placed to restore worked land. In addition to protecting Ivy House Farm and Brickfield Cottage bunds are located alongside the A4020 and part of the A412 for amenity reasons. A low bund would also be provided along the northern side of Footpath 25 where there is presently no hedgerow to screen views into the extension area.
 - (iv) Sand and gravel would be extracted under water by an excavator and stockpiled before being loaded into a feed hopper by a loading shovel and onto a ground conveyor linking and transported to, the existing plant site. No dewatering of the mineral will take place. The main conveyor line will cross Footpath 25 and a shallow bridge will be constructed over the conveyor enabling pedestrians and horses to cross safely. For Phase 1 the conveyor will also need to cross the Rusholt Brook. The conveyor network will be extended as extraction progresses.
 - (v) Silt lagoons will be formed in the southern part of Phase 1, with silt being pumped from the plant site. This will enable the existing silt lagoons to be restored.
 - (vi) Infilling with inert material will follow extraction as quickly as practicable to ensure the progressive restoration of the site. The land will be restored to existing ground levels subject to minor adjustments to improve drainage. Infilling will be by tipper lorries and dumper trucks using the haul routes shown on the plans. An additional haul road crossing of Footpath 25 will be required and a controlled crossing is proposed which would be the same as the existing road crossing.
 - (vii) The land will be restored for agricultural use, and will incorporate a replacement woodland together with a number of hedgerows. The final area to be restored will be the existing plant site.

Restoration

50. It is proposed to restore the land for agricultural use to existing ground levels, subject to minor adjustment of levels to enhance drainage. Infilling with imported inert material and quarry waste (as at the existing quarry) will take place progressively following sand and gravel extraction as shown on the Phasing Plans. Upon completion of filling of each phase topsoil and subsoil will be replaced, either from storage bunds or by direct placement from future extraction areas. Replaced soils will be ripped as necessary to break up any compaction and provide drainage and will be prepared for cultivation using agricultural machinery. Soils will only be handled in appropriate weather conditions.
51. Extensive planting is proposed as part of the restoration scheme including the replacement of the woodland block and hedgerows. The existing plant site will be the final phase to be worked, and restored in accordance with the approved restoration scheme for the quarry. The access via the roundabout onto the A412 is to be retained for the afteruse of the site.

Soil Handling

52. The majority of the site comprises 'best and most versatile land' for agriculture being Graded 2 and 3a under the Agricultural Land Classification system. All soils will be reserved for restoration of the site to agriculture. Soils will be handled during appropriate weather conditions using appropriate machinery to protect soil structure, and soil bunds and stockpiles will be limited in height to avoid compaction.

Landscaping

53. As set out above, the land within the extension area is mainly used as grazing for a horse livery and grass cropping, but contains a block of woodland known locally as 'The Copse' towards the centre with a gap where crossed by the overhead electricity line. Part of the woodland will be retained on the eastern boundary, but the remainder would be lost by working. The restoration proposals include the replacement of the woodland. Trees along the route of the Rusholt Brook will be retained in an undisturbed corridor. A number of other trees within the site will be lost, but these are relatively few in number. The trees and hedgerows along the boundary of the A412 and A4020 will be retained, maintained and strengthened by additional planting as necessary. A tree survey has been carried out to identify trees to be lost and retained.

Aftercare

54. Following restoration the land will be subject to a 5 year period of aftercare to bring it successfully back into agricultural use. Aftercare details will be submitted during restoration once ground conditions are known and it proposed that should be dealt with by a planning condition.

Plant Site and Concrete Batching Plant

55. Under the current planning permissions, the minerals processing plant and concrete batching plant are required to be removed by 2021. These will be required beyond this date in connection with the proposed northern extension. The plant site and concrete plant are therefore included in the current application.

Lighting

56. Low level security and safety lighting is installed on existing plant and buildings. The plant site is not floodlit. No lighting is proposed in the area of extraction. Working and restoration is limited to daylight hours for safety reasons.

Plant and Machinery

57. The mobile plant and machinery typically used at the quarry comprises:
- Excavator;
 - Loading Shovels;
 - Dump Trucks; and
 - Dozers (for filling).

Operational Hours

58. It is not proposed to change the approved hours of working which are:

7.00am to 6.00pm Mondays to Fridays

7.00am to 1.00pm Saturdays

1.00pm to 6.00pm Saturdays for maintenance only

No operations are carried out on Sundays or Public Holidays Access and Traffic

Access and Traffic

59. The existing quarry access via the roundabout onto the A412 will be used without any modifications. The working of the northern extension will not in itself alter the existing number or pattern of HGV movements to and from the site since the annual rate of extraction will not be directly affected. The level of activity will fluctuate on a daily basis, depending on the demand for aggregates and for inert filling.
60. Planning conditions attached to the current minerals planning permissions limit the HGV movements to a maximum of 296 per day (148 in and 148 out). The daily numbers of HGV movements have generally been well within the permitted limits. The normal average level of daily HGV movements is estimated to be 174 movements per weekday. It is envisaged that HGV movements will remain unchanged.

Employment

61. The quarry directly employs 6 full time operational staff and lorry drivers. The quarry supplies the on-site concrete batching plant operated by London Concrete that employs 8 staff. In addition, the quarry supports company headquarters staff, contractors, and non-company lorry drivers.

Overall Period of Development

62. The current planning permissions require the restoration of the existing workings and the removal of all plant by 23 June 2021 (Condition 2 of Planning Permission Ref 11/01460). It is estimated that the northern extension would extend the life of the mineral extraction until the end of 2024. However, a further period is required to enable the final infilling of the quarry and restoration of the site including the plant site. It is therefore proposed to extend the life of the quarry, until 31 December 2026.

The existing consented quarry, other than the plant area, will be restored in accordance with the timescales set out in the extant planning permission, unless varied by the HOAC proposal, if approved.

Planning Policy

63. Relevant development plan policies in relation to proposed extension to mineral extraction at New Denham Quarry include the following:
64. From the Buckinghamshire Minerals and Waste Local Plan (MWLP) (2006):
- Policy 28 - Amenity;
 - Policy 29 - Buffer Zones;
 - Policy 31 - Restoration and Aftercare;
 - Policy 34 - Aviation Safeguarding Areas;
 - Policy 36 - Planning Application issues;
 - Policy 37 - EIA; and
 - Policy 38 - Planning Obligations;
65. From the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012):
- Policy SO1 - Improving the Sustainability of Minerals Development;
 - Policy SO4 - Spatial Distribution of Minerals Development;
 - Policy SO9 - Protection of the Green Belt and AONB;
 - Policy SO10 - Protecting and Enhancing the Environment;
 - Policy CS/LP1 - The Overarching Presumption in favour of Sustainable Development;
 - Policy CS1 - Minerals Safeguarding;
 - Policy CS2 - Areas of Search;
 - Policy CS4 - Maintaining the Level of Sand and Gravel Provision;
 - Policy CS5 - Preferred Areas;
 - Policy CS15 - Landfill;
 - Policy CS18 - Protection of Environmental Assets of National Importance;
 - Policy CS19 - Protection of Environmental Assets of Local Importance;
 - Policy CS20 - Green Belt;
 - Policy CS22 - Design and Climate Change; and
 - Policy CS23 - Enhancement of the Environment.
66. From the South Bucks District Local Plan (SBDLP) (1999):
- Policy GB1 - Green Belt;
 - Policy EP3 - The Use, Design and Layout of Development;
 - Policy EP4 - Landscaping;
 - Policy TR5 - Accesses, Highway Works and Traffic Generation; and
 - Policy TR10 - Heavy Goods Vehicles.
67. From the South Bucks Core Strategy (SBCD) (2011):
- Policy CS9 - Natural Environment.
 - Policy CS13 – Environmental and Resource Management

68. There is also the emerging Minerals and Waste Local Plan, but as this is only in the early stages of preparation, and whilst still a material consideration at the early stage, can be attributed only very limited weight.
69. Relevant national planning policy includes the National Planning Policy Framework (NPPF) (March 2012), National Planning Policy for Waste (2014) and the Planning Practice Guidance (PPG) on:
- Air Quality;
 - Environmental Impact Assessment;
 - Flood Risk and Coastal Change;
 - Minerals;
 - Natural Environment.
 - Noise;
 - Open space, sports and recreation facilities, public rights of way and local green space;
 - Travel plans, transport assessments and statements in decision-taking;
 - Waste; and
 - Water supply, wastewater and water quality

Consultations

70. **Local Member Cllr Roger Reed:** The Local Member for New Denham has not formally commented on the application.
71. **SBDC District Planning Officer:** South Bucks District Council raise no objection to the current application, but do comment on the proximity of the application site to neighbouring residential properties at Brickfield Cottage and Ivy Farm House. The Council is concerned that the extraction of land in close proximity to these houses, would be likely to give rise to additional noise, dust and general disturbance which could be of detriment to the occupiers.
72. The Council also requests that the removal of screening bunds or their integration into a wider landscaping scheme upon completion of the sand and gravel extraction.
73. **Denham Parish Council:** No comments received.
74. **SBDC Environmental Health Officer:** SBDC's Environmental Health Officer has advised that the planning application should take the following into consideration:
- **Noise:** Potential risk from vehicle movements and operational plant and advise that a suitable noise monitoring scheme should be put in place to protect local receptors;
 - **Vibration:** In order to ensure effective mitigation of vibration, from vehicle movement and the operation of the other plant, that a suitable management plan should be put in place to address and risks to receptors;
 - **Dust particulate or any emissions to air:** That a dust, fibre and particulate Management plan should be put in place, including monitoring. The close location of this site to an Air Quality Management Area should require an

assessment of nitrogen dioxide emissions likely from this development and a suitable action plan put in place where necessary to protect public health;

- **Road maintenance:** In order to prevent a deterioration of surrounding roads due to mud, litter etc, roads should be swept, sprinkled with water in dry weather and adequate vehicle wheel washing facilities should be provided;
- **Site Traffic movement:** Should be restricted in volume and speed so as not to cause disturbance to local residents and road users and restricted to normal working hours;
- **Odour:** The odour risk should be assessed and an appropriate management plan put in place;
- The idling of site traffic should also be prohibited. Any planned disruption to traffic flows around the site should be submitted to Transport for Bucks for consideration;
- **Water runoff:** Should be managed so as not to cause pollution, pooling or flood risk in the vicinity of the site. The creation of various water bodies along with existing water bodies presents the requirement for a flood risk assessment and protection of the water quality;
- If **lighting** is to be used on the site, it must be used sensitively so as not to cause disturbance to local residents;
- **Land quality** should be protected by the secured placement of fuels, oils, lubricants etc in secure tanks and bunds. Spill kits should be available on site to deal with and leaks or accidents and regular inspection of this storage is advised. Any contamination discovered during the construction phase should be reported to South Bucks District Council immediately;
- Any **soil** imported to site should have been tested in situ prior to its transfer to site. Any removal of soil and waste from site should be done so with the appropriate permit/licence;
- Suitable **security** measures should be put in place to prevent acts of vandalism producing a pollution risk;
- **Ecological investigations** should identify any habitats or protected species such as Great Crested Newt, in and around the site, and permit conditions should require protection of these should they be found;
- All of the above would be addressed in the **Environmental Statement**.

75. **National Planning Casework Unit:** Has no comments to make on the application.

76. **Jonathon Clark (Internal ROW):** Advises that Public Footpath 25 Denham Parish (DEN/25/1) passes in an east west direction across the site. The footpath provides the only pedestrian link between New Denham/Uxbridge and the rights of way network and quiet lane network to the west of the A412. There are onward connections in a westerly direction lead to Tatling End. The ambition for Footpath 25 is to upgrade it to a bridleway to allow cycling access, but it is noted that not all of the land falls within the applicant's control. The path is fenced-in on both sides for some of its length and suffers from becoming overgrown.

77. Footpath 25 is and would be affected in a number of ways by the existing quarry operation and new extension as follows:

- a controlled crossing is provided for pedestrians at the haul road junction with Footpath 25, which is proposed to remain;
- a sand and gravel conveyor is proposed to transport sand and gravel from the extension across Footpath 25 and a new bridge for walkers will pass over this conveyor;

- a new haul road to phases 2-4 is proposed across Footpath 25 with an additional controlled crossing for pedestrians; and
- there would be noise, dust and visual impacts.

78. The application's Landscape and Visual Impact Assessment refers to the quarry extension having a '**Notable adverse significant level of effect**' on Footpath DEN/25/1 between Brickfield Cottage and Southlands manor, which abuts as well as passes through the site. Effects are associated with both views to the south across the existing processing plant, in particular the concrete plant, as well as future effects with partially obscured views over the extraction area and effects associated with additional lorry movements crossing the track to gain access to the void during infilling operations. This is deemed to be a significant effect.
79. In light of these negative visual impacts, as well as the additional haul road crossing, conveyor bridge, noise and dust, it seems likely the application will cumulatively result in pedestrians being discouraged from using the footpath. It is therefore suggested that the applicant funds resurfacing of the footpath between the A412 and Knighton Way Lane, a distance of 851 metres, by way of a section 106 contribution, to encourage greater use by walkers. It is also suggested that an assessment is made of the necessity to fence the footpath through the development. Where this is absolutely essential for safety and security an improved corridor width of at least 4 metres should be provided to avoid walkers being hemmed-in and the footpath becoming overgrown. Considering the parallel application for the HOAC site, which will promote outdoor activities, improvements to the footpath corridor will be complimentary.
80. It is noted that a planting scheme may be a condition of this application. This should avoid locating species close to the footpath that might result in the footpath becoming overgrown and obstructed. In addition, the proposed bund should be positioned a sufficient distance from the footpath so as not to narrow the suggested 4 metre corridor.
81. The design specification for the bridge over the sand and gravel conveyor will need to be agreed by the highway authority and a condition is recommended covering this point.
82. In summary, with the above in mind, it is recommended that a financial contribution of £51,000 be made through a section 106 Agreement, towards work to upgrade the footpath between the A412 and Knighton Way Lane. It is also recommended that conditions be included in the permission requiring submission of the fencing to be provided alongside Footpath 25, the removal of unnecessary barriers and the creation of a corridor width of at least 4 metres where the footpath falls within the application boundary. It is also requested that condition be included requiring submission of the details of the bridge to be constructed over the conveyor have been submitted, for approval by the County Council.
83. **County Ecology Advisor:** Advises that the extension site is largely down to improved horse pasture with a good network of hedges in the western half of the site and woodland (The Copse) which includes elements of a wet woodland, but is inaccessible and appears to be mostly dry at present.
84. The impact to the habitats includes the loss of much of the woodland (temporarily) with most being replaced during restoration and the loss of internal hedges. There will be a loss of grassland too, however the reported loss of semi natural grassland

would appear to be an error as the grassland on the site is improved. Two concerns are raised:

(1) Some of the hedges which are to be removed appear to be of higher value than reported. This specifically includes the hedge running north from the western edge of the Copse. Although it is reported that it is not an 'Important Hedge' under the Hedgerow Regulations 1997, it has significant features which would suggest it is of higher value than most. Although the number of woody species has been identified as below the necessary for important hedge status, there are other woody species (oak and ash) which have not been included. (they may not occur within the 30m stretches chosen. In addition, the deep ditch, connection of the hedge to other hedges and woodland, and inclusion of hedgerow trees are features which increase its value. There is also a lot of potential for features which support protected species (either as commuting routes or nest sites). In addition a review of historic records suggest that the land to the west was cleared from woodland and that means the hedge may be very old. (although this doesn't necessarily confirm it is a historic 'Important Hedge'. The value of the hedge for biodiversity however should not be understated.

(2) The BBOWT response has questioned the lack of biodiversity within the restoration plan and the potential loss of wildlife populations during the development extraction phase. This is particularly important because the land is within a biodiversity opportunity area (BOA) and restoration of quarry sites such as this provides opportunities for the County to achieve net gains for biodiversity. The land is owned by the County Council but leased out to an intensive equine grazing unit. It does however sit adjacent to the main quarry which has its own restoration plan although it is uncertain at present how this is going to be taken forward.

85. The ecology advisor further advises that many quarries have their own BAP or management plan to ensure that the co-ordination of all phases of development and restoration does not lead to any loss of wildlife populations and results in optimal conditions for wildlife. They suggest that such a Management Plan and Restoration plan which ensures a net gain for biodiversity is conditioned into the planning permission.
86. The northern extension is a stand-alone application, so a stand-alone management and restoration plan is possible. However, the ecology advisor also suggests significantly more biodiversity enhancements are required to safeguard wildlife populations during operations and add biodiversity enhancements to the site than is present within the current restoration scheme. Alternatively, it may offer the owners more flexibility and potentially greater opportunities to amalgamate the management and restorations of the existing and extension quarries into a single management/restoration plan. The Ecology Advice Service would be happy to help with the development of such a plan.
87. **SBDC Historic Buildings Officer:** No comments received.
88. **Strategic Flood Management Team:** The Strategic Flood Management Team have no objections to the proposal subject to the inclusion of conditions relating to submission of a surface water management scheme based on sustainable drainage principles and a "whole-life" maintenance plan for the drainage system (e.g. a maintenance schedule for each drainage/SuDS component) following construction.
89. **RAF Northolt Safeguarding Consultee:** No comments received.

90. **Highways Development Management:** Comment that the proposed development would involve an extension of the existing quarry to the north. The sand and gravel would be extracted at a predicted rate of 250 – 300,000 tonnes per annum over a period of 5 – 6 years. Extraction from the proposed northern extension would commence following completion of extraction from the permitted quarry. It is understood that the existing quarry site is limited by condition to 296 HGV movements per day (148 in, 148 out), and that the proposed development would not exceed this limit. Provided this can continue to be secured by condition, the Highway Authority have **no objection** to the proposal in principle.
91. Highways Development Management also comment that a new access will be constructed from the existing access road into the extension area. It is requested that the applicant submits a swept path analysis showing the largest vehicle which would use this access, how appropriate manoeuvring space to serve the northern extension will be provided and details of wheel washing. All of these matters, can be addressed by condition.
92. **Highways England:** No comments received.
93. **Environment Agency:** The Environment Agency has **no objections** to the proposed development subject to the inclusion of conditions relating to the following matters:
- (i) Submission of the scheme including details of:
 - the storage of materials;
 - the storage of chemicals;
 - the storage of oil;
 - the storage of hazardous materials;
 - the proposed method of working;
 - the proposed phasing of development;
 - the proposed maintenance and after-care of the site;
 - future restoration and landscaping;
 - the provision of road and wheel cleaning facilities;
 - proposed scheme for monitoring of groundwater levels and groundwater;
 - quality as the existing boreholes are lost during extraction; and
 - measures taken to protect existing licensed groundwater supplies likely to be affected by the proposed works.
 - (ii) That piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.
 - (iii) That the development shall not commence until a scheme for the disposal of foul and surface water has been submitted to and approved by the County Council.
 - (iv) That no development shall take place until a scheme for the provision and management of a 16 metre wide ecological buffer zone alongside the Rusholt Brook shall be submitted to and agreed in writing by the County Council.
94. The Environment Agency has also requested the addition of Informatives to any decision notice issued relating to the need for Environmental Permit and consent from the Local Lead Flood Authority in relation to the construction of any structures

that impact on either main rivers or ordinary water courses, the disposal of controlled waste, discharges to foul drainage and the discharge of treated sewage effluent. The Environment Agency has also requested that a number of advice notes to the applicant be included with the decision notice.

95. **Natural England:** Natural England has offered a number of comments under the following headings:

Wildlife and Countryside Act 1981 (as amended)

96. It advises that the application site is in close proximity to Kingcup Meadows Site of Special Scientific Interest (SSSI). It is satisfied that if the proposed development is carried out in strict accordance with the details of the application, as submitted, it will not damage or destroy the interest features for which the site has been notified. Therefore, Natural England has no objections and no conditions are requested.

Biodiversity Enhancements

97. Natural England advises that the application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application.

Soils, Land Quality and Reclamation

98. Natural England advises that the proposed development would extend to approximately 28ha, including some 23.2ha of 'best and most versatile' (BMV) agricultural land; namely Grades 2 and 3a land in the Agricultural Land Classification (ALC) system. It is however satisfied that that the site working and reclamation proposals provided in support of this application meet the requirements for sustainable minerals development set out in the NPPF and current Minerals Planning Practice Guidance, particularly section 6 titled "Restoration and aftercare of mineral sites", and recognised best practice.

Other Advice

99. Natural England expect the Local Planning Authority to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity);
- local landscape character; and
- local or national biodiversity priority habitats and species.

100. **Jacobs, Landscape:** Jacobs have commented that the Environmental Statement includes a 'Landscape Character and Visual Impact Assessment Report' which has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment (Third edition) prepared by the Institute of Environmental Assessment and the Landscape Institute. A digital terrain model of the application area incorporating the existing development has been prepared to determine the site's Zone of Theoretical Visibility (ZTV) and the extent of the visual envelope, in accordance with the requirements of the Screening and Scoping Opinion issued in the 6th April 2016.

101. The study concludes overall that the proposed development would generally lead to very minor residual adverse levels of landscape and visual effects within the wider landscape during the proposed operational life of the development. Further, the assessment process found that “whilst higher levels of effect potentially occur within close proximity to the site, existing or proposed screening measures, along with the rapid extraction and backfilling process, enabling progressive restoration back to productive agricultural after-uses, generally mitigates against the overall degree of landscape and visual effects.”
102. Jacobs advise that the study concludes that the proposal can be integrated into the local landscape without causing significant detriment to the landscape character, quality and visual amenity of the immediate locality and would not give rise to any cumulative impacts when combined with other developments. As such the proposed development and extended timescales are therefore compliant with both the NPPF and the Local Development Plans.
103. Jacobs advise that the mitigation during the working period including temporary bunding and the direction of working, has been designed to minimise effects from visual receptors and that the overall level of detail and coverage contained in the Landscape Character and Visual Impact Assessment Report is proportionate and appropriate, and that the assessment and magnitude of landscape and visual effects consequent on the proposal, would appear to be reasonable.
104. Jacobs also advise that whereas direct effects on landscape character and upon visual receptors are assessed as low, the prevailing effects beyond the site boundaries can be expected for an extended period in terms of the loss of tranquillity due principally to vehicle movements. That said, it advises that the site is located in an area where tranquillity is already significantly reduced by proximity to the M40, other highways and built up areas, so this impact will be less significant.
105. In order to retain healthy retained landscape features, Jacobs advise that the proposed excavations and the storage of materials on land immediately adjacent to retained trees should be subject to minimum clearances agreed with the arboricultural/forestry adviser to take account of root protection and potential depression of the water table.
106. Jacobs consider that the proposed landscape treatment represents a net increase in the provision of hedgerows, however; the inclusion locally of well-placed hedgerow trees would be beneficial to provide additional structure and landscape strength in an area affected by overhead pylons.
107. Jacobs also consider that whilst the detail of the landscape proposals provided by the landscape mitigation plan is appropriate in nature it should be considered indicative, and accordingly recommend the a more detailed planting plan be submitted.
108. Similarly, a 5-year aftercare period is proposed but Jacobs advise that further details should be requested.
109. Jacobs consider that the successful return of the land to productive agricultural use would be a vital component of the restoration and integration of the restored site into the local landscape. A five-year Agricultural Aftercare and Drainage Scheme is included with the application which should be implemented.
110. Jacobs advise that there is no basis for objection on the grounds of adverse landscape and/or visual effects. They do however, advise that it would be appropriate to require the submission further details, which can be addressed by condition, of

details of protection zones between all retained vegetation and the proposed excavations and stockpiles; and fully detailed planting proposals including a specification using locally occurring indigenous species, stating the species, size at time of planting, planting spacing/densities, total plant numbers and planting protection and fencing. This should include hedgerow trees and details of grass seeding outside of the agricultural fields.

111. The additional information should also include an establishment management and maintenance programme for a minimum of five years' aftercare for all new planting works, and should include a requirement that during the programme period for the replacement of all failed plants (irrespective of cause) in the planting season immediately following failure
112. **Jacobs Forestry:** Jacobs provided initial comments on the Tree Report and Impact Assessment include with the planning application. This is assessed providing a full and detailed report, subject to the submission of a number additional or revised details.
113. Jacobs agree that the major impact is the loss of most of the wooded area referred to as 'The Copse'. Jacobs advise that the reasoning provided as to the reduced impact of these tree removals refers to the low category grading of the trees due to poor condition, lack of species diversity and previous clearance for the powerlines, is reasonable.
114. Jacobs advise that, subject to some additional clarification of the protection of some of the hedges and trees, that revised Tree Survey and Impact Assessment Report is acceptable and that plan has clarified the details relating to the precise stand-off distances required to protect the arboricultural features within and around the development site.
115. **Archaeology:** The County archaeologist advises that the Buckinghamshire Historic Environment Record (HER) includes relevant records relating to the site shows the presence of a Bronze Age to Early Iron Age ditch and Roman Burial cemetery, three flint scatters dating from the late upper Palaeolithic to the Mesolithic and Upper Palaeolithic to Mesolithic finds. They also advise as follows:

Archaeological and related interests

116. While initial archaeological evaluation and geoarchaeological assessment works have been carried out, only a portion of the Site was available for these investigations. As a result, the complete distribution, presence, location and significance of any buried archaeological remains within the Site cannot currently be confirmed on the basis of the available information. Accordingly, it is recommended that the remaining areas of the Site are subject to evaluation and geoarchaeological assessment, to be secured as a pre-commencement condition as agreed by the County Archaeologist. This will enable a detailed mitigation strategy to be developed in consultation with the Local Planning Authority.
117. If planning permission is granted then it is likely to harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 141. With reference to the NPPF the archaeologist recommends, based on the advice in DOE Circular 11/95, that any consent granted should be subject to the following conditions that require:

- (i) That no development takes place until the applicant, have undertaken archaeological evaluation in form of a geophysical survey and trial trenching in accordance with a written scheme of investigation which has been submitted to and approved by the County Council. Where significant archaeological remains are confirmed these will be preserved in situ.
- (ii) That No development shall take place until the applicant has produced a Geoarchaeological Deposit Model to inform areas of high potential for Palaeolithic and Mesolithic/Neolithic sites in accordance with a written scheme of investigation which has been submitted to and approved by the County Council and that where high potential areas are evaluated and significant archaeological remains are confirmed these will be preserved in situ;
- (iii) That where significant archaeological remains are confirmed, no development shall take place until the applicant has provided an appropriate methodology for their preservation in situ which has been submitted to and approved by the County Council;
- (iv) That where archaeological remains are recorded by evaluation and are not of sufficient significance to warrant preservation in situ but are worthy of recording no development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved by the County Council; and
- (v) That the archaeological investigation should be undertaken by a professionally qualified archaeologist working to the agreed written schemes of investigation.

London Heathrow Airport Safeguarding

118. Heathrow Airport has assessed the application against safeguarding criteria and confirmed that we it has **no safeguarding objections** to the proposed development.

Representations

119. One letter of representation from a local resident in Knighton Way. This states that there are aspects of the proposal which will cause problems for local residents.
120. The primary issue raised in the representation relates to the area of woodland in the centre of the site, in areas of Phase 2 and Phase 4. This is referred to in the application as the Clump, but which the representations states should correctly be referred to as the Copse.
121. The representation expresses concern that the Tree Survey Report included with the application does not include consideration of the extent of ash dieback (Chalara) amongst the ash trees identified within The Copse.
122. Concern is also expressed that that there has been poor arboreal husbandry of the Copse by the tenant occupiers of the land, but regardless of this that the area of woodland should be retained.
123. The application indicates that some of the trees are to be retained, but concern is expressed that past practice indicates that this might not be the case.

124. The representation states that there are benefits from the presence of the Copse including as wildlife habitat, providing a baffle from noise from the surrounding roads, and reducing the impact of the pollution.
125. The representation concludes that the local community is already experiencing the negative aspects of having an industrial extraction business on its doorstep and will be disappointed to have a second extension to the term originally planned.
126. In addition, a lengthy letter of representation has been received from the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust objecting to the development. This in summary objects to the proposal and makes the following points:
 - The application is not compliant with Policy CS22 (g) and Policy CS23(a) of the BCC Minerals and Waste Core Strategy and the NPPF in that it does not provide a clear biodiversity enhancements that support the Biodiversity Action Plan habitat targets and the priorities of Biodiversity Opportunity Areas or provide for adequate habitat creation to support the provision of ecological networks.
 - There is insufficient compensation for the loss of hedgerow and woodland priority habitat, contrary to Policy CS19 of the BCC Minerals and Waste Core Strategy and the NPPF;
 - The application does not show evidence of achieving a net gain in biodiversity as required by the NPPF;
 - There is insufficient evidence that populations of wild bird species, including priority species, will be maintained, contrary to the NPPF and the Conservation of Habitats and Species Regulations 2010 as amended by paragraph 9a of the Conservation of Habitats and Species (Amendment) 2012 Regulations).

Discussion

Introduction

127. It will be evident from the details of the application, consultations responses and representations outlined above, that there has been only limited objection to the proposal from local residents in and around New Denham and one objection the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust. Whilst the comments from consultees and the representations have raised a number of issues in relation to the environmental impacts, none of the technical statutory consultees has offered any objections to the application either on technical grounds, inadequacy of the submitted information, or on the basis that the application is contrary to policy.
128. Whilst I have comments to make in relation to a number of the environmental issues raised by objectors, and I have undertaken a number of visits to the site to assess these, I consider, based on the responses of the technical statutory consultees, that there are no overriding environmental impacts that cannot be overcome and which cannot, if necessary, be addressed by condition, so as to warrant refusal of planning permission. There are nevertheless, as with other recent mineral extraction proposals planning policy issues, primarily relating to the need, that do present a fundamental issue in relation to the determination of this application, although in this case these lead me to the view that there are grounds for approval of the application.
129. On this basis, I shall first consider the environmental impacts of the proposal, starting with landscape and visual impact and then turn to the need related issues. I do not propose to deal with all the environmental impacts in detail as these are addressed in

the comments of technical consultees, but there are nevertheless a number of issues that arise from the responses from both consultees and objectors, on which I will comment.

Landscape and Visual Impacts

130. A full Landscape and Visual Impact Assessment (LVIA) has been carried out and is included in the Environmental Statement submitted with the application and allows an assessment against relevant planning policy which includes the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012) Policy SO10 - Protecting and Enhancing the Environment, Policy CS18 - Protection of Environmental Assets of National Importance, Policy CS19 - Protection of Environmental Assets of Local Importance, Policy CS23 - Enhancement of the Environment; the South Bucks District Local Plan (SBDLP) (1999): Policy EP4 - Landscaping and the NPPF and NPPW.
131. The assessment identifies that the site does not lie within any statutory protected landscape designations. As part of the South Bucks District Landscape Character Assessment, the site falls within the area identified as the Colne Valley landscape character area. The main characteristics of this area are that it is flat wide floodplain with little height variation, dominated by rough grazing and pasture interspersed with arable fields and paddocks. The tree cover is sparse and gravel extraction has shaped the landscape with former gravel pits restored to lakes. Transport corridors, including the M40, have a strong visual and audible influence. The impact on the landscape character of the development is accordingly assessed as slight during the operational life of the quarry, and slightly beneficial following restoration.
132. The LVIA includes a detailed assessment of the visual impact of the proposals from residential properties, commercial properties, footpaths and roads in the proximity of the site. The quarry extension is assessed as having a visual impact, but with mitigation in the form of screen bunding the assessment concludes that this can be reduced. The visual effect from the nearest properties in Knighton Way Lane, Brickfield Cottage and 99 Oxford Road is assessed as moderate. The site can be viewed from a footbridge over the A40/M40 roundabout at the northern end of the site. The effect from here is also assessed as being moderate. The greatest visual effect is assessed as being from Footpath 25 that crosses the application site between the proposed mineral extraction extension and the existing plant site. However, the impact is considered to be transitory and can be mitigated by screen bunding. Otherwise the visual effects are assessed as having less impact – e.g. slight or neutral.
133. The assessment identifies that the visual impact will also be mitigated by the progressive working with restoration scheme which minimises the operational area at any time. It is also proposed to restore the land to its existing agricultural use including the replacement of the woodland and hedgerows.
134. A number of mitigation measures are identified by the assessment as already being present or occurring naturally. These include the existing woodland and hedgerows which in the flat Colne Valley landscape restricts views into the application site. In addition, new screening bunding will be constructed and tree planting undertaken that will help to mitigate any adverse effects.
135. The overall conclusions are that the visual effects will be limited to a relatively restricted area around the site and that the proposals can be integrated into the local landscape without causing significant detriment to the landscape character, quality and visual amenity of the immediate locality.

136. The Council's Landscape Advisors have advised that they agree with the conclusions of the LVIA and that they have no objection to the proposal from landscape and visual perspective, subject to the submission of the additional plant and tree and hedgerow protection details, which can be addressed by condition.
137. In terms of the specific consideration of trees the only public objection to the planning application comes from a local resident. This, as detailed above is concerned with the loss of most of the area of woodland in the centre of the site known as the Copse.
138. The Tree Survey Report included with the application, which provides a detailed assessment of the impact on trees and the proposed mitigation works.
139. The survey report identifies the Copse is an unmanaged tract of woodland, the upper canopy of which is divided in two by the overhead power lines which run through the extension area. The Copse is described as having been divided into groups of trees, two located to the east of the power lines, and two to the west. The predominant tree species is identified as Crack Willow, and as being of low quality or value, largely due to poor form and condition, decay, and a high proportion of branch failure and fallen trees. The area is identified as appearing to be unmanaged and with some overmature Willow trees reaching the end of their useful life cycle.
140. The tree group on the western edge of the Copse, adjacent to the Rusholt Brook, is identified as including a line of mature Oak trees, which are assessed as being trees of moderate quality and value.
141. The Survey report identifies that the proposals will require the removal of the majority of The Copse (comprising three of the groups of trees present and three individual trees), along with 5 other individual trees present elsewhere within the site, 3 other groups of trees and approximately 1492 linear m of hedgerow.
142. The survey report concludes that there would be an impact arising from the removal of trees within The Copse but that this would be low/moderate. There would be a higher assessed level of loss of the more distinctive tracts of mature and well established woodland with the area, but even the impact on this, the report concludes would be lessened by the fact that the majority of trees present which make up The Copse are of low quality or value, reaching the end of their useful lives and exhibiting significant failures and defects. Furthermore, the species present, predominantly Crack Willow, is relatively short lived. In addition, a large section within the centre of The Copse has been cleared to provide clearance for the overhead power lines present, which has effectively divided the woodland of The Copse into two. Due to these factors the arboricultural value of the trees of the trees is assessed as being low, and the impact of the loss of the trees to be removed is therefore reduced.
143. The higher value area as the western extent of The Copse, which includes the mature Oak trees, is to be retained as part of the proposed standoff to Rusholt Brook, and protected with an appropriate standoff area. Similarly, the trees at the eastern edge of The Copse will be retained in accordance with recommendations made in the ecological report, as a dead wood habitat, and also in order to provide a 10m stand off from a main badger sett which has been identified within this area (see ecological report).
144. In terms of mitigation, it is proposed to provide replanting works as part of the progressive restoration scheme that will be undertaken at a 2:1 ratio for individual trees assessed, whereby two trees would be planted as part of the restoration scheme for every one individual tree proposed for removal, with like-for-like species, and a 1:1 ratio for assessed tree groups.

145. As set out above, Jacobs advise that the reasoning provided as to the reduced impact of these tree removals from the Copse is justified due to the low category grading of the trees and their poor condition, and that the proposed mitigation is acceptable, including the reinstatement of The Copse with appropriate species following the completion of the extraction works is appropriate.
146. For this reason, I concur with the comments from Jacobs and consider the proposal is acceptable in terms of its landscape and visual impact and in terms of the proposal for the removal of trees within the area known as the Copse and their reinstatement following the working and restoration of the site.
147. Accordingly, I consider that the proposal is acceptable on landscape and visual impact ground and in relation to the protection and retention of key natural landscape features including tree and hedges and can be considered to comply with the Buckinghamshire Minerals and Waste Local Plan (MWLP) (2006), Policy 31 - Restoration and Aftercare; the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012) Policy SO10 - Protecting and Enhancing the Environment, Policy CS18 - Protection of Environmental Assets of National Importance, Policy CS19 - Protection of Environmental Assets of Local Importance, Policy CS23 - Enhancement of the Environment; the South Bucks District Local Plan (SBDLP) (1999): Policy EP4 - Landscaping and the NPPF and NPPW.

Green Belt

148. Turning to the Green Belt arguments, it should be noted that there have been no objections from either statutory consultees or in the form of third party representations on ground impact on the Green Belt or Green Belt planning policy. A key point to note on this issue is that national planning policy set out in the NPPF, Paragraph 90, excludes mineral extraction from the definition of Inappropriate Development in the Green Belt, although this does not make the issue immaterial, for the reasons I will come on to below. The development of waste management facilities in the Green Belt are subject to Green Belt policy, both in national planning policy (including the NPPF, paragraphs 79-91 and the NPPW, paragraph 6) and local Development Plan policy (the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012), Policy CS20).
149. However, as far as the proposal is concerned, it is clear that the importation of inert fill material is intended primarily to enable restoration of the mineral extraction void and will enable the return of the land to agriculture, thereby maintaining a use that is entirely consistent with the purposes of the Green Belt, and this is recognised in Policy CS20 which acknowledges requirements in connection with the restoration of a mineral working as 'very special circumstances'.
150. The aspect of Green Belt policy where I am of the view that there is case to consider is that Policy CS20 makes clear that proposals for mineral extraction will be permitted but only where the development complies with other policies set out in the Core Strategy. Because, as I have outlined above, the application does raise an issue in terms of need, I consider that it can only be treated as in compliance with Policy CS20 if it is also in compliance with Policies CS4 and CS5. In other words, if there is not a proven need case, then there is justification for refusal of the proposal as development of a mineral extraction site in the Green Belt in relation to Policy CS20, because it would not otherwise be compliant with other relevant policies of the development plan. I will come on to this point in more detail in discussing the need argument in the relevant section below.

Ecology

151. A detailed ecological assessment has been carried out and is included in the Environmental Statement (ES). The site itself is not subject to any international, national or local designations. There are three Sites of Special Scientific Interest (SSSI) and two Local Nature Reserves within 2 km of the site. These are considered in the ES and have been assessed as not being adversely affected.
152. A number of species surveys have been carried out. These identified that:
 - No reptiles or amphibians are believed to breed on site;
 - No specially protected bird species are considered to breed within the application area;
 - No otters or water voles were found, although the increase flow in Rusholt Brook after restoration may encourage habitation by water voles;
 - A badger sett within The Copse near the eastern boundary will be retained with an appropriate stand-off. The position regarding outlier setts will be reviewed in advance of working Phase 4 and a decision made whether to retain or relocate if they are still active; and
 - A single brown long-eared bat roost within a tree alongside Rusholt Brook and will be retained.
153. The site does not contain any nationally scarce plants or plants scarce in Buckinghamshire. The only habitat present is the dead wood within The Copse. As detailed above some of the woodland will be retained as habitat for invertebrates.
154. In terms of the proposed restoration, the overall strategy is based on the infilling of the worked mineral extraction areas with inert material and restoration to agriculture with mitigation embedded in the design of the extension area, specifically the retention of the Rusholt Brook with an 8 metre standoff, and retention of both ends of the Copse. The latter is intended to provide suitable conditions for the retention of standing dead wood and also for the placement of dead wood to benefit invertebrates.
155. Consideration has been given to the possible impact on bird strike in relation to London Heathrow and RAF Northolt. The restoration scheme does not include any water bodies. Whilst water areas and silt ponds will be formed during working these will be temporary and operational. There is a Bird Management Plan for the existing quarry, which it is proposed will continue. Accordingly, there will be no assessed adverse effect on aviation safety.
156. There will be the full restoration of all the hedge lines in their original positions together with an additional 631m of hedges. It is proposed that species composition will reflect those species currently present on the site but each hedge will have an increased range of species, so as to increase the flowering and fruiting season to benefit invertebrates and birds. These will be supplemented with standard oak and willow trees as replacements for those currently present and is intended to support the enhancement of a Priority Habitat.
157. There will be replacement of the ditch line which currently runs through the Phase 2 in the northern part of the extension area, together additional surface water drains totalling 2084m.
158. The Rusholt Brook is being retained together with its existing hedge line and there will be the creation of buffer strips alongside the Brook. This will total 1.05 ha and the tall grasses adjacent to the watercourse will be designed to be suitable for breeding reed bunting.

159. It is proposed that there will be the total replacement of the lost dry woodland. The planting will include woodland species such as oak, field maple, birch, hawthorn and hazel. Glades will be created within it providing sunny sheltered areas of open space for invertebrates including butterflies and bumblebees. To provide maximum benefit, planting in these areas will be undertaken, so as to comprise a transition from grass and herbs through bushes to trees.
160. It is proposed that an attenuation area is to be created which will be planted with tall tussocky grassland totalling 0.12 ha. The tall and tussocky nature of the grassland will be designed to deter feral geese from using the sward and to provide hunting ground for owls, possibly including barn owl and kestrel. The land will be designed to be suitable for foraging and potentially breeding reptiles. The tall grass will additionally provide breeding habitat for reed bunting. It will also provide attractive conditions for grass feeding butterflies.
161. As detailed above Natural England in relation to designated sites has not raised any issues in relation to the assessment of the impact on ecology and biodiversity.
162. However, Natural England, the County Ecology Advisor and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) have raised the issue of habitat enhancement and the lack of biodiversity in the restoration proposals. Whilst the applicant has responded to this concern, by the inclusion of habitat management and creation as well as detailed proposals for ecological mitigation, compensation and enhancement, in order to ensure compliance with the statutory duty to conserve biodiversity as prescribed under s40 of the Natural Environment and Rural Communities Act 2006, the County Ecology Advisor has recommended the inclusion of a condition requiring the submission and approval of a Management and Restoration plan which will ensure a net gain for biodiversity, a recommendation that I would agree with.
163. Natural England have also recommended a number of general conditions and conditions relating to soil handling, soil stripping, soil placement, differential settlement, and aftercare be attached to the permission in the event that the County Council is minded to approve consent.
164. In view of the advice from consultees, and the recommendation that the concerns about the level of habitat enhancement can be addressed through the inclusion of an appropriate condition, I consider that the proposal is in compliance with relevant development plan and national planning policy, i.e. the Buckinghamshire Minerals and Waste Local Plan (MWLP) (2006), Policy 31 - Restoration and Aftercare; the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012) Policy SO10 - Protecting and Enhancing the Environment, Policy CS18 - Protection of Environmental Assets of National Importance, Policy CS19 - Protection of Environmental Assets of Local Importance, Policy CS23 - Enhancement of the Environment; and the NPPF and NPPW.
165. I also consider that the County Council can ensure compliance with its obligation under s40 of the Natural Environment and Rural Communities Act 2006, with the inclusion of a condition requiring the submission and approval of a Management and Restoration plan to ensure a net gain for biodiversity.

Access and Traffic

166. As detailed above the development of the proposed northern extension would involve sand and gravel extracted at a rate of 250 – 300,000 tonnes per annum over a period of 5 – 6 years and that this would commence following completion of extraction from the existing quarry.

167. The planning permission for the existing quarry limits the number of HGV movements to 296 per day (148 in, 148 out), and the proposed development would not exceed this limit. On this basis, there is no objection to the proposal. The standard of the existing access on to the roundabout at the entrance of the site with the A412 Denham Road does not present any issues.
168. County Highways Development Management have indicated the need for further details of the internal access and parking arrangements should be provided, but as these are only internal they advise that this is requirement that can be addressed by condition.
169. No comments have been received from Highways England and there have been no representations making objections on highways grounds.
170. Accordingly, I consider that the proposal is acceptable on highways grounds and can be considered to complaint with the South Bucks District Local Plan (SBDLP) (1999): Policy TR5 - Accesses, Highway Works and Traffic Generation and the NPPF and NPPW.

Best and Most Versatile Agricultural Land

171. A substantial part of the site, is as Natural England have identified, 'best and most versatile' (BMV) agricultural land; i.e. Grades 2 and 3a land under the Agricultural Land Classification (ALC) system.
172. I do not consider this to be a significant issue in relation to the determination of the application. The proposal includes considerable detail on soil handling and it is intended retain all the top soils and sub soils on the site and restore it to agriculture. There would be no permanent loss of agricultural land, with the site being progressively restored. Natural England have not objected, and have requested, if consent is approved, that a number of detailed requirements are imposed by condition to ensure the agricultural afteruse of the land and safeguard the soils on the site. On this basis, I consider that the proposal is acceptable in terms of the protection of Best and Most Versatile Agricultural land and national planning policy relating to this matter included in the NPPF.

Hydrogeology and Hydrology including Flood Risk

173. A detailed Hydrogeological and Hydrological Assessment, including a Flood Risk Assessment, has been included as part of the Environmental Statement, submitted with the application. This assesses the impacts of the development in relation to surface and groundwater conditions at the site, and also considers groundwater quality and the effects on nearby protected habitats.
174. The assessment identifies the Rusholt Brook as crossing the site, flowing in a southerly direction within a well-defined channel and that it is classified as a 'Main River' by the Environment Agency. It flows into the River Colne to the south of Denham Quarry. The alignment of Rusholt Brook through the mineral extraction area will not be altered, and it proposed to protect it by buffer strips on either bank. The workings will be 'wet' worked i.e. without any dewatering, and there will therefore be no significant effects on Rusholt Brook during working.
175. The site will be progressively backfilled to original ground levels with inert material. The assessment identifies that there is a potential that overall surface water runoff rates will be slightly increased as a result of the low permeability infill material. A surface water drainage scheme has been designed to ensure that runoff rates into Rusholt Brook are not increased above pre-development conditions.

176. In relation to groundwater, the assessment identifies that the site is currently permanently dry and in agricultural use as grazing. The groundwater lies within the underlying sand and gravel between c.0.4 metre and c.2.8 metres below ground level. Monitoring shows that the dominant groundwater flow direction is southerly. As the sand and gravel will be worked 'wet' and there will be no significant effects on groundwater levels during extraction. There is the potential for any damming of groundwater flow to increase levels to the north and west of the site. However, this would be prevented by the installation of groundwater drains along the north-eastern and north-western site boundaries. The bases of these drains will be connected to the underlying gravel aquifer so that groundwater can flow up into these drains from below should groundwater levels be raised. The drains will be connected to Rusholt Brook. In terms of encouraging the ecology of Rusholt Brook any increase in flow is likely to be beneficial. There will be no significant impact on water dependent habitats at Kingscup SSSI.
177. Regarding flood risk, the site is located entirely within Flood Zone 1 where there is a low risk of flooding from surface and groundwater sources. Sand and gravel extraction is identified as being entirely appropriate in Flood Zone 1. A Sustainable Drainage Strategy (SuDS) is proposed to control surface water runoff from the backfilled and restored land. The proposed drainage will discharge surface water runoff from much of the site to groundwater.
178. The application site is not within a groundwater Source Protection Zone (SPZ). Groundwater and surface water quality at the application site is currently monitored and there are no indications of any significant impacts of quarrying on groundwater quality, other than that most likely associated with road salting on the A412. Current measures to mitigate the risk to groundwater quality at the quarry will be continued – relating to the provision the staff welfare facilities, plant fuelling arrangements and infill materials.
179. The proposed extraction and inert infilling in the extension area would follow the same approach as the existing extraction area and would involve wet working with no dewatering. The assessment identifies that with adoption of the mitigation measures used at the existing site and those identified in the report that there would be no significant impact of ground or surface waters.
180. As detailed above the Environment Agency has no objection to the proposed development subject to the inclusion of appropriate conditions requiring the submission of additional works designed to protect surface and ground water conditions or safeguard against any increase in the potential for groundwater flooding.
181. On this basis, I consider the proposal to be acceptable in terms of the impacts on the water environment, and national and local development plan policies relating to this matter including the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012) Policy SO10 - Protecting and Enhancing the Environment, Policy CS19 - Protection of Environmental Assets of Local Importance, Policy CS23 - Enhancement of the Environment; and the NPPF and NPPW.

Archaeology and the Historic Environment

182. A full assessment of the site archaeology and wider cultural heritage has been carried out and submitted as part of the planning application. The work was undertaken by Wessex Archaeology who have been involved in Denham Quarry from the start and therefore have extensive knowledge of the existing quarry and its context.

183. The archaeological and cultural background includes several archaeological periods including
- (i) Palaeolithic and Mesolithic (older than 4000BC);
 - (ii) Neolithic and Bronze Age (4000 - 700BC);
 - (iii) Iron Age and Romano-British (700BC - AD410);
 - (iv) Saxon and Medieval (AD410 - 1500); and
 - (v) Post-medieval and Modern (AD1500 - Present Day).
184. A number of investigations have been carried out as part of the assessment and are included in the Environmental Statement which include a Historic Environment desk based assessment which confirms that there are no designated heritage assets within the site and but there that the potential for the presence of buried archaeological remains particularly relation to the prehistoric, Romano-British and post medieval periods.
185. A detailed geophysical survey was carried out for the additional northern extraction area in September 2015 to identify any magnetic responses that might represent buried archaeological features and guide subsequent fieldwork. This demonstrated anomalies that may indicate archaeological activity and merit further investigation.
186. The Archaeological Evaluation involved digging 34 shallow archaeological trial trenches. This work did not identify any significant evidence for pre-medieval archaeology. Five shallow ditches were identified and appear to form part of a wider medieval or post-medieval field system but contained little dateable material.
187. The County Archaeologist has considered the detailed submissions and has raised no objection to the proposal on either archaeological grounds or the potential impact on the historic environment subject to the addition of standard archaeological excavation and recording conditions to any planning consent issued.
188. On this basis I consider the proposal to be acceptable in terms of the impacts on archaeology and the historic environment, and development plan policies and national planning policy relating to archaeology and the historic environment including the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012) Policy SO10 - Protecting and Enhancing the Environment, Policy CS19 - Protection of Environmental Assets of Local Importance, Policy CS23 - Enhancement of the Environment; and the NPPF and NPPW.

Noise

189. A noise assessment has been carried out and is included in the Environmental Statement. The assessment has involved noise measurements at five representative locations; Southlands Manor, Quarry Cottages, Moat Place, Ivy House Farm and Brickfield Cottage. Noise levels have been found to be generally determined by road traffic noise, birdsong and local vehicle movements.
190. What impacts there would be on local residents is principally due to the proximity of workings to nearby residential properties, but also relates to the relationship of the site to local Public Rights of Way and any other public access. There are a number of commercial premises in the area including KFC and Smiths Garden Centre and the impact on these uses has also been considered.
191. Site noise calculations have therefore been undertaken for nine locations, taken to be representative of the nearest noise sensitive premises. The additional four locations are Southlands Manor Lodge, Knighton Way Lane, New House Farm and The Bungalow. The suggested noise limits for these locations are, 55dB LAeq 1hr for

routine operations and 70dB LAeq 1hr for temporary operations such as soil stripping.

192. These limits are in line with the requirements Planning Practice Guidance and are suggested as appropriate for inclusion in any planning conditions, as for the current quarry workings.
193. The calculated site noise levels for routine and temporary operations on site comply with the suggested site noise limits at all the assessment locations. Accordingly, the assessment concludes that the site can be worked while keeping noise emissions to within environmentally acceptable limits.
194. To ensure that that this is the case the design of the proposed workings includes mitigating against any potential loss of amenity through noise is by the provision of buffer zones between the workings and any nearby residential properties and other sensitive land uses. The design of the buffer zones follows the advice of the project noise consultants to ensure the predicted noise levels are acceptable and within the national noise guidelines.
195. Specifically, buffer zones have been incorporated into the scheme to protect the amenities of Brickfield Cottage and Ivy House Farm. The buffer zones incorporate screen bunding that also extends along the Oxford Road boundary (A4020) to protect the amenities of houses along the opposite side of this road. Additional bunding is also proposed along the eastern site boundary to strengthen the mitigation for the main built up area of New Denham which lies 150 - 200 metres to the east. The proposal includes the retention of the minerals processing plant and concrete batching plant. The nearest property to this area is Southlands Manor. The impact on Southlands Manor will not change.
196. Impact on amenity is also minimised by restricting the operational hours to normal working hours (as described in the project description) and other operational measures.
197. The SBDC Environmental Health Officer has confirmed that no objection is raised to the proposal on grounds of noise subject to the addition of a condition requiring the installation of an approved noise monitoring system for the duration of the development.
198. Accordingly, I consider the proposal to be acceptable in terms of noise and relevant development plan policies and national planning policy including the Buckinghamshire Minerals and Waste Local Plan (MWLP) (2006) Policy 28 Amenity and Policy 29 Buffer Zones, the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012) Policy SO10, the South Bucks District Local Plan (SBDLP) (1999): Policy EP3 - The Use, Design and Layout of Development, and the NPPF and NPPW.

Air Quality

199. An air quality and dust assessment has been undertaken which is included in the Environmental Statement with the application. The scope of the assessment was agreed with the SBDC Environmental Health Officer and focusses on dust. The assessment identifies that the prevailing wind direction is towards the north east towards Oxford Road. The assessment considers the possible impact of dust on properties around the site including residential properties in Oxford Road and Knighton Way Lane, and local businesses. The dust impact during normal quarrying operations is assessed to be low-medium at a small number of locations when working is at its closest point. The dust impact will be greater during temporary

operations, including soil stripping and bund construction, would be for relatively short periods of time.

200. An assessment of PM10 (very small particles) has also been undertaken as the site is near to the M40 corridor which is an Air Quality Management Area (AQMA). The present background PM10 levels are about 50% of the National Air Quality Objective level and the proposed quarry extension would have no material impact on these levels.
201. The proposed extension would be subject to the existing Dust Management Plan for the quarry which sets out the detailed measures to manage and mitigate dust (included in the Environmental Statement dust report). Dust will continue to be monitored and a new monitoring point will be established on the boundary of the northern extension area.
202. The proposal will have no adverse impact on the amenities of local residents with regard to impact on air quality given the mitigation measures proposed, and regulation through planning conditions. There are no objections from the SBDC Environmental Health Officer in relation to air quality and dust.
203. Accordingly, I consider the proposal to be acceptable in terms of its air quality and dust impacts and relevant development plan policies and national planning policy including the Buckinghamshire Minerals and Waste Local Plan (MWLP) (2006) Policy 28 Amenity and Policy 29 Buffer Zones, the Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012) Policy SO10, the South Bucks District Local Plan (SBDLP) (1999): Policy EP3 - The Use, Design and Layout of Development, and the NPPF and NPPW.

Landbank and Need

204. Turning to the landbank and need issues, as has been set above, the applicant has provided a detailed need argument contending that the consented landbank of sand and gravel reserves in Buckinghamshire has now come down to a level where, although the current landbank exceeds the minimum 7 year landbank which the NPPF advises, the County Council now needs to be consenting additional reserves to ensure maintenance of an adequate supply of aggregates in the County.
205. As I have detailed above the argument presented draws on the figures set out in the Local Aggregates Assessment (LAA) for 2015 which concludes, based on the ten-year sales trend for sand and gravel from within Buckinghamshire, that the County at that time had a landbank sufficient for 11.8 years at 31st December 2014. It estimates that since then the landbank has reduced to approximately 8.8 million tonnes on the basis that 1.27 million tonnes will have been extracted since 31st December 2014.
206. The way this issue is approached is that the NPPF advises that landbanks are an indicator of the security of aggregates supply. However, it also advises that other considerations also need to be taken into account, including the productive capacity of existing sites and distribution of permitted reserves. The applicant in this case argues (based on the information set out in the Local Aggregates Assessment 2015) that New Denham Quarry is now one of only two long term active quarries in Buckinghamshire, with the other being the nearby Denham Park Farm quarry, although this produces a different material and serves a different market area. Apart from this it is argued that substantial proportion of the permitted reserves are also tied up at the other large operational site (Springfield Farm) which has a production limit. In other words the production in Buckinghamshire is being constrained or at risk of being constrained by the limited number of operation sites as well as the consented landbank.

207. The applicant's argument is that the existing permitted reserves at New Denham Quarry are sufficient for approximately 2½ years of production. There is therefore a need to grant further extensions to New Denham Quarry to maintain production of sand and gravel, and concrete.
208. The Committee will recall that an essentially similar argument was presented by the applicant for proposed development of a new mineral extraction site at Slade Farm near Hedgerley (Application Ref. CM/59/15), which was refused consent in July 2016. At the time in my report on that application, I advised the Committee that current landbank is not significantly over ten years, but nevertheless it does indicate that there is currently more than sufficient reserve based on the rolling ten-year average sales figures and is clearly in excess of the 7 year landbank required by the NPPF. However, I also advise that I do not consider it to be so high that the Council should not consider granting consent for additional reserve in appropriate locations.
209. More recent informal advice from the Minerals and Waste Policy Team is that they estimate that Local Aggregates Assessment for 2015 shows that in 2014 sales of sand and gravel in the County were 0.69 million tonnes, with the 10-year average being 0.85 million tonnes and the 3 year average 0.7 million tonnes. The permitted reserve at the end of 2014 was 10.07 million tonnes. Based on the sales figure at the end of 2014 this indicates a landbank of some 11.8 years based on the 10-year average sale figure. However, the Minerals and Waste Policy Team also advise that Policy CS4 requires BCC must maintain a landbank of sand and gravel equivalent to at least 7 years work over supply over the period to 2026, and paragraph 6.8 of the Local Aggregates Assessment analyses that the earliest the landbank would fall below 5.95 million tonnes based on the 10-year rolling average requirement would be 2019. Therefore, the Local Aggregates Assessment identifies that there will be a shortfall in the minimum landbank supply by 2019, so that there is a need to increase mineral productivity.
210. The reason for refusal of the Slade Farm application in relation to the need argument was that current development plan in the guise of Policy CS5 of the Mineral and Waste Core Strategy gives the preference for extending existing sites, and there was in relation to that application, no clear and overriding argument in favour of granting consent at that time or new green field development in the Green Belt, when there was a reasonable prospect of the other proposals for extensions to existing sites coming forward, including the current application.
211. This issue does not apply in the case of this application, which is for an extension to the existing New Denham Quarry. As such it is consistent with Minerals and waste Core Strategy Policy CS5 and accordingly, in the absence of any other policy objections, also consistent with Policy SO9 - Protection of the Green Belt and Policy CS20 - Green Belt and Policy GB1 - Green Belt of the South Bucks District Local Plan.
212. Accordingly, I consider that the applicant does present a valid need argument and as extension to an existing mineral extraction site, and the application is also acceptable in terms of Minerals and Waste Core Strategy Policies SO1 - Improving the Sustainability of Minerals Development and Policy SO4 - Spatial Distribution of Minerals Development and the NPPF.

Other Matters

213. Public Rights of Way: Whilst the Rights of Way Officer has not objected to the proposal the Committee will, as outlined above, see that he has recommended that a financial contribution of £51,000 be made through a section 106 agreement, towards work to upgrade Public Footpath 25 between the A412 and Knighton Way Lane by way of resurfacing. He has also recommended the inclusion of conditions to ensure

that proper maintenance of the footpath and details of the bridge over the sand and gravel conveyor.

214. In response to the recommendation that a financial contribution be sought for the resurfacing the Public Footpath 25, the applicant has advised they does not consider reasonable to link the upgrading of the path to the temporary minerals operations proposed for Denham North.
215. Whilst they acknowledge that the proposed works will have a significant effect on the amenity of footpath users, they argue this is mitigated by the additional bunding and planting proposed, the provision of controlled crossings and the limitation of working hours. They also point out that the quarry will not be working when most walkers use it, i.e. in the evenings and at weekends, and that there is no evidence that users are deterred by the existing quarry.
216. Upon full consideration of the Rights of Way Officer's comments, I do not consider that the impacts of the proposal on Footpath 25 as well as the users of Footpath 25 merits the request for the financial contribution. The impacts will be satisfactorily mitigated through the bunding and planting proposals and therefore the financial contribution is not necessary to make the development acceptable in planning terms. Consequently, refusal of permission in the absence of the contribution would not be justified. Accordingly, I recommend that consent be granted without a S.106 agreement to secure the financial contribution for the upgrading of Public Footpath 25. The other matters raised by the Rights of Way Officer can be addressed by way of appropriate conditions. These include a condition relating to the adequate maintenance of the footpath, which would ensure access along the footpath is not inhibited.
217. Aviation Safeguarding: As detailed above, consideration has been given to the possible impact on bird strike in relation to London Heathrow and RAF Northolt. The restoration scheme has been amended from that originally proposed so that it does not include any water bodies and the Bird Management Plan for the existing quarry will continue to be implemented. Accordingly, there will be no assessed adverse effects on aviation safety and Heathrow Airport has confirmed that it has no safeguarding objections to the proposal. It can therefore be considered to be acceptable in terms of the Buckinghamshire Minerals and Waste Local Plan (MWLP) Policy 34 - Aviation safeguarding Areas.

CONCLUSION (including recommendation)

218. I consider that the information submitted is appropriate and sufficient to demonstrate that the proposal is in accordance with the development plan and with national planning policy. I agree with the applicant that that the consented landbank of sand and gravel reserves in Buckinghamshire has now come down to a level where, although the current landbank exceeds the minimum 7 year landbank which the NPPF advises, the County Council does need to consent additional reserves to ensure maintenance of an adequate supply of aggregates in the County. The proposal would provide this and would do so in a preferred location as an extension to an existing site in accordance with Policy CS5, thereby avoiding the need to open up new green field mineral extraction sites.
219. Accordingly, it can be considered to be sustainable development and consequently also in accordance with the Buckinghamshire Minerals and Waste Core Strategy Policy CS/LP1 and the National Planning Policy Framework, Paragraph 14 and NPPW, Paragraph 1.

220. The proposal will also contribute to conserving biodiversity, and it is therefore recommended that this application is granted subject to the conditions as outlined in Appendix A.

BACKGROUND PAPERS

Application Ref. CM/23/16 including Volume 1 Planning Application and Volume 2 Environmental Statement and Non-Technical Summary prepared by Stephen Bowley Planning Consultancy, June 2016;

Buckinghamshire Minerals and Waste Local Plan (MWLP) (2006);

Buckinghamshire Minerals and Waste Core Strategy (MWCS) (2012);

Emerging Buckinghamshire Minerals and Waste Local Plan;

South Bucks District Local Plan (SBDLP) (1999);

South Bucks Core Strategy (SBCD) (2011);

National Planning Policy Framework (NPPF) (March 2012);

National Planning Policy for Waste (2014);

Planning Practice Guidance (PPG) on:

- Air Quality;
- Environmental Impact Assessment;
- Flood Risk and Coastal Change;
- Minerals;
- Natural Environment.
- Noise;
- Open space, sports and recreation facilities, public rights of way and local green space;

Consultation responses dated 4th July 2016 to 14th November 2016

Appendix A

Commencement

Commencement

1. The development hereby permitted shall commence no later than three years from the date of this planning permission. No later than seven days before the date of commencement, written notification of the date of commencement shall be notified to the County Planning Authority.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990.

General

2. The development hereby permitted shall not be carried out otherwise than in complete accordance with the details submitted with the application dated 28 June 2016 (and the Environmental Statement dated June 2016) and the following drawings and supporting details and documents:

- M12.162(g).D.032 – Location of site
- M12.162(g).D.033 – Site Location Plan
- M12.162(g).D.001 – Current Situation
- M12.162(g).D.002 – Block Phasing
- M12.162(g).D.015 – Phase 1 Working Scheme
- M12.162(g).D.016 – Phase 2 Working & Restoration
- M12.162(g).D.017 – Phase 3 Working & Restoration
- M12.162(g).D.018 – Phase 4 Working & Restoration
- M12.162(g).D.019 – Phase 5 Working and Restoration
- M12.162(g).D.034 – Phase 6 Completion of Infilling
- M12.162(g).D.005 – Concept Restoration to Agriculture (Infill with Inert Recovery Materials).
- DEN/500 Rev A – Site Plan of Proposed New Plant
- DEN/501 Rev A – Elevations of Proposed New Plant
- 2513/01 Rev A – Proposed Ready Mix Concrete Plant
- 2513/02 Rev B – Proposed Ready Mix Plant Overlay (Proposed on Consented)
- SB/150/1 – Details of Outbuildings – Weighbridge Office
- SB/150/2 – Details of Outbuildings – Canteen
- SB/150/3 – Details of Outbuildings – Workshop
- 1250/12 – Agreed Layout of 4-arm roundabout on A412

Reason: To define the development which has been permitted and so to control the operations (Buckinghamshire Minerals and Waste Local Plan Policies 28 and 36).

Time Limit

3. Final restoration shall be completed and all plant, machinery and equipment, other than that required for ongoing management and maintenance, shall be removed from the land no later than 31 December 2026.

Reason: To control the period of operations within the timescale which has been judged by the County Planning Authority to be acceptable (Buckinghamshire Minerals and Waste Local Plan Policies 28 and 36).

Decision Notice for Inspection

4. A copy of the decision notice, the plans and documents as hereby approved shall be kept at the site office and be available for inspection by employees and agents of the site operators and the County Planning Authority at any time during working hours.

Reason: To ensure that all staff are aware of the relevant conditions and that an orderly programme of operations is carried out in such a way that the adverse effects on the local community are kept to a minimum and that the complete restoration of the land to a beneficial use is achieved (Buckinghamshire Minerals and Waste Local Plan Polices 28 and 36).

Working Programme and Phasing

5. Working and restoration shall be carried out in 6 main phases as shown on Phasing and Restoration Plans and described in the other documents approved under Condition No. 2

Reason: To ensure that the site is worked and restored in an orderly manner (Buckinghamshire Minerals and Waste Local Plan Polices 36).

6. Between 20 January and 20 February in each calendar year during the period of the operations hereby authorised, a plan of not less than 1:2500 scale shall be submitted to the County Planning Authority showing:
 - a) The progress of soil stripping and soil storage;
 - b) Extent and depth of excavation;
 - c) Extent and levels of infill;
 - d) Progress with soil replacement and areas that have been restored at a date within 14 days prior to the submission of the plan.

Reason: To assist the County Planning Authority in monitoring the progress of the development and identify at an early stage any problem with meeting the date required by Condition No. 3 for the completion of restoration Buckinghamshire Minerals and Waste Local Plan Policy 31).

7. Prior to the extraction of mineral hereby permitted the method by which the operator will keep a record of the tonnage of mineral leaving the site, the tonnage of waste being imported to the site; and the number of daily HGV movements, including details of the ongoing use of the Automatic Traffic Count System previously installed on the access road under Planning Permission Ref. SBD/8201/06 which shall be maintained in accordance with the previously approved details for the duration of the development unless otherwise agreed in writing by the County Planning Authority. The records kept pursuant to the approved scheme shall then be made available to the County Planning Authority no later than one week after any request to view them has been made.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development and to monitor traffic levels associated with the site and to protect the amenities of the local area (Buckinghamshire Minerals and Waste Local Plan Polices 28 and 30).

8. No mineral processing plant or buildings shall be located other than in the Plant Site and Stocking Area (Phase 5) shown on Drawing No. M12.162(g).D.002 unless otherwise agreed in writing with the County Planning Authority.

Reason: To ensure that mineral processing and stockpiling is not carried out other than in the designated areas, in the interest of local amenity and flood protection (Buckinghamshire Minerals and Waste Local Plan Polices 28 and 33).

9. Stockpiles of processed or unprocessed mineral within the site shall not exceed 8 metres in height and boundary bunds shall not exceed 5 metres in height unless otherwise agreed in writing by the County Planning Authority.

Reason: In the interests of local amenity and flood protection (Buckinghamshire Minerals and Waste Local Plan Polices 28 and 33).

Restriction of Permitted Development Rights

10. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 or any subsequent revisions, modifications, revocation or re-enactment, no buildings, plant or machinery, structures or erections required for the winning, working, treatment, preparation for sale, consumption or utilisation of minerals under this consent shall be erected on the site without the prior written approval of the County Planning Authority.

Reason: There is an exceptional need here to secure control over additional plant and machinery, in the interests of local amenity in visual terms and bearing in mind the degree of discretion allowed by the GPDO 2015 (Buckinghamshire Minerals and Waste Local Plan Polices 28).

Hours of Operation

11. No operations authorised by this consent shall be carried out other than between the following hours:

7:00am to 6.00pm Mondays to Fridays

7.00am to 1.00pm Saturdays

1.00pm to 6.00pm Saturdays for maintenance only

No operations other than for essential maintenance, shall be carried out on Sundays or Public Holidays, unless otherwise agreed in writing by the County Planning Authority.

Reason: In the interests of local amenity (Buckinghamshire Minerals and Waste Local Plan Polices 28).

12. The site access road shall be gated at both ends. The gate on the access road nearest the A412 shall not be opened more than one hour prior to the approved operational hours of the site as stated in Condition No. 11, to allow for vehicles to pull off the A412. The second security gate, nearest the operational area of the site shall not be opened outside the hours as stated in Condition No. 11. No use of the access road for any purpose, other than for essential maintenance, shall be made on Sundays or Public Holidays.

Reason: In the interests of local amenity (Buckinghamshire Minerals and Waste Local Plan Polices 28).

Nature Conservation

13. No tree felling or similar works shall be carried out other than outside the bird nesting season, which runs from the end of March to September. Alternatively, if works cannot be appropriately scheduled, vegetation must be inspected beforehand by a suitably experienced ecologist. Clearance must only be undertaken if the ecologist has confirmed the absence of nesting birds.

Reason: To protect the ecological interest of the site (Buckinghamshire Minerals and Waste Local Plan Policy 25).

Access and Vehicles

14. Parking, manoeuvring, loading and unloading of all site operatives', visitors, construction, waste and mineral vehicles shall be carried out in accordance with a vehicle access and management plan for each phase to be submitted and approved in writing by the County Planning Authority prior to the commencement of each phase. The plan shall include details of the proposed access road extension, including a swept path analysis showing how the largest vehicles would use the access turning into and out of the access road extension, and HGV turning areas within each phase. The scheme for each phase shall be laid out prior to the extraction of mineral and that area shall not thereafter be used for any other purpose unless otherwise agreed in writing by the County Planning Authority.

Reason: To enable vehicles to draw off, park, load, unload and turn clear of the highway and thereby minimise danger, obstruction and inconvenience to users of the adjoining highway (Buckinghamshire Minerals and Waste Local Plan Policies 28 and 30).

15. The maximum total number of Heavy Goods Vehicle movements in and out of the site shall not exceed 296 (148 in, 148 out) per day.

Reason: In the interests of highway safety and the amenities of the local area (Buckinghamshire Minerals and Waste Local Plan Policies 28 and 30).

16. The vehicle wheel and body cleaning facilities previously approved under Planning Permission Ref. SBD/8201/06 be maintained to the approved specification and utilised thereafter by all heavy goods vehicles involved in the transport, handling or deposit of waste or mineral prior to those heavy goods vehicles exiting the site.

Reason: In the interests of highway safety and the amenities of the local area (Buckinghamshire Minerals and Waste Local Plan Policies 28 and 30).

17. The site access road between the cleaning facilities and the public highway shall be constructed of a hard-bound surface, at all times be maintained clean and free of mud and debris and be swept with a mechanical sweeper, with water suppression if necessary, to ensure that the access road is clean and doesn't cause a dust nuisance. Any problems, which form in the access road, shall be filled within 24 hours.

Reason: In the interests of highway safety and the amenities of the local area (Buckinghamshire Minerals and Waste Local Plan Policies 28 and 30).

Pollution Prevention and Control

18. No wastes other than naturally occurring excavated materials, construction and demolition, and builders' waste of a non-putrescible nature shall be imported to and deposited at the site.

Reason: The importation of waste materials outside these categories would raise environmental and amenity issues which would require consideration afresh (Buckinghamshire Minerals and Waste Local Plan Policies 28, 31 and 33).

19. Any oil storage tanks shall either be sited on impervious bases and surrounded by oil tight bund walls which shall be capable of containing 110% of the tanks' volume and shall enclose all fill and drain pipes or be prevented from causing pollution in accordance with other details to be submitted to and approved in writing by the County Planning Authority.

Reason: To ensure that groundwater and surface water bodies are not polluted (Buckinghamshire Minerals and Waste Local Plan Policy 33).

20. No solid matter shall be stored within 10 metres of the banks of any watercourse,

Reason: To prevent solid matter from entering any watercourse and causing pollution and to safeguard the integrity of the watercourse. (Buckinghamshire Minerals and Waste Local Plan Policy 33).

Noise

21. No part of the development shall be commenced until a scheme for the monitoring and mitigation of noise, which shall identify the nearest noise sensitive properties, has been submitted to the approval of the County Planning Authority. The development shall not thereafter be carried out other than in compliance with the approved noise monitoring and mitigation details for the duration of the development.

Reason: To protect occupants of nearby residential premises from loss of amenity from noise disturbance. (Buckinghamshire Minerals and Waste Local Plan Policy 28).

- 22.(a) Except for the temporary operations outlined in paragraph (b) below, the equivalent continuous noise level at the nearest residential properties, due to operations on the site, shall not exceed 55dB LAeq, 1 hour, free field at the nearest sensitive properties to be shown on a plan to be submitted to and approved in writing by the County Planning Authority prior to the commencement of the development (as part of the scheme for the monitoring and mitigation of noise).

(b) For temporary operations, such as soils and overburden removal, bund construction and removal, the equivalent continuous noise level at the nearest residential properties, due to operations on the site, shall not exceed 70dB LAeq, 1 hour, free field) at the nearest noise sensitive properties. Temporary operations which exceed the normal day-to-day noise limit of 55dB LAeq, 1 hour, free field shall be limited to a total of eight weeks in any twelve-month period for any individual dwelling. All works for which this noise limit and time constraint will not be met shall be subject to prior written approval by the County Planning Authority.

Reason: To protect occupants of nearby residential premises from loss of amenity from noise disturbance. (Buckinghamshire Minerals and Waste Local Plan Policy 28) and Policy EP3 of the South Bucks District Local Plan).

23. All plant and machinery used at the site shall be properly silenced and maintained in accordance with the manufacturer's specification.

Reason: To protect occupants of nearby residential premises from loss of amenity from noise disturbance. (Buckinghamshire Minerals and Waste Local Plan Policy 28).

Air Quality

24. No part of the development shall be commenced until a scheme for the monitoring and mitigation of dust has been submitted to the approval of the County Planning Authority. The scheme shall include:

- a) Details of adequate protection against wind-whipping at conveyors and any transfer point;
- b) Details of enclosure of all transfer points to minimise the generation of airbourne dust;
- c) Details of keeping conveyor return belts clean and means of collecting materials removed by this cleaning process;
- d) Details of water suppression for use on all material processing facilities.

The development shall not thereafter be carried out other than in accordance with the approved dust, fibre and particulate monitoring and mitigation details for the duration of the development.

Reason: To protect occupants of nearby residential premises from loss of amenity from dust particles. (Buckinghamshire Minerals and Waste Local Plan Policies 28 and 30 and South Bucks District Local Plan Policy EP3).

25. No part of the development shall be commenced until a scheme of PM10 monitoring and mitigation has been submitted to and approved in writing by the County Planning Authority. The scheme shall accommodate (1) the construction and site preparation phase of the development, and (2) the operational period of the site including extraction and infilling. It shall:

- a) Identify the nearest sensitive properties and the potential PM10 impacts on sensitive receptors;
- b) List the 'significant long term dusty activities;
- c) Detail the monitoring regime to be implemented during period of significant long term dusty activities;
- d) Incorporate the principles of Best Available Techniques (BAT) for assessment and control of activities to lead to an increase in PM10 emissions;
- e) Include a regular review off the monitoring undertaken and the potential PM10 implications of future activities.

The development shall not thereafter be carried out other than in accordance with the approved PM10 monitoring and mitigation details for the duration of the development, unless otherwise agreed in writing by the County Planning Authority.

Reason: To protect occupants of nearby residential premises from loss of amenity and to prevent deterioration of air quality (Buckinghamshire Minerals and Waste Local Plan Policy 28 and South Bucks District Local Plan Policy EP3).

Lighting

26. No additional illumination shall be erected or otherwise provided on the site without the prior written approval of the County Planning Authority.

Reason: To ensure that there is no problem of light spill beyond the boundaries on the site (Buckinghamshire Minerals and Waste Local Plan Policy 28).

Surface Water Drainage

27. No part of the development shall be commenced until a surface water drainage scheme for the site, based on sustainable drainage principles has been submitted to and approved in writing by the County Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- Discharge Rates;
- Discharge Volumes;
- Detailed; drainage layout with pipe numbers, gradients and pipe sizes (where applicable) and storage volumes of all SuDS features;
- Construction details for all SuDS features;
- Sustainable drainage features where possible, such as infiltration trenches and infiltration basins;
- Phasing;
- Investigation of the suitability of including drainage ditches as opposed to field drains. Justification must be provided if drainage ditches are ruled out. If suitable details of cross-sections and long-sections of the drainage ditches with consideration given to the use of two staged channels should be provided;
- Network file containing calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site; and
- Details of overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to adjacent or downstream sites.

Reason: To ensure that a sustainable drainage strategy has been agreed prior to construction in order to ensure that there is a satisfactory solution to managing flood risk and to comply with the Buckinghamshire Minerals and Waste Local Plan Policy 28 and 33.

28. No part of the development shall be commenced until a “whole-life” maintenance plan for the site has been submitted to and approved in writing by the County Planning Authority. The plan should set out how and when to maintain the full drainage system (e.g. a maintenance schedule for each drainage/SuDS component) following construction, with details of who is to be responsible for carrying out the maintenance. The plan shall subsequently be implemented in accordance with the approved details.

Reason: To ensure that maintenance of the surface water drainage scheme and to comply with the Buckinghamshire Minerals and Waste Local Plan Policy 28 and 33.

Soil Stripping and Storage

29. Prior to the commencement of working in any new phase of the development, a scheme setting out the method of:

- a) Soil stripping, handling, storage and replacement
- b) The machinery to be used in a)
- c) The location of internal haul routes

Shall be submitted to and approved in writing by the County Planning Authority. The scheme shall also include details for the marking out of each phase with posts prior to the commencement of working. The approved details shall be implemented thereafter for the duration of the development.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

30. Soils and upper subsoils will be replaced in the correct sequence and to at least the original depths on those areas to be restored to land. Soils graded 2 and 3A, as identified on plan no RWA/01 Appendix D attached to Section 8: Soil and Agricultural Land Quality Assessment June 2016 shall be used in the restoration of the grassland and woodland areas and less good soils used only for infill, unless otherwise agreed in writing by the County Planning Authority.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

31. No topsoil or subsoil shall be removed from the site without prior written approval from the County Planning Authority.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

32. When being moved both to storage locations and to final surface position, topsoil and subsoil shall be transported and not bladed.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

33. Soil stripping or movement of soil shall not be undertaken between October and March, inclusive, unless otherwise agreed in writing by the County Planning Authority. During this period, soil shall not be moved other than when the soil is in a dry and friable condition.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

34. At least three working days' notice shall be given to the County Planning Authority of the planned commencement of soil movement operations including soil stripping, regrading or spreading of topsoil or subsoils (or subsoil substitute material). Soil movement operations shall not be carried out if the County Planning Authority advises the operator that soil conditions are not suitable.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

35. All topsoil shall be stripped and stored separately from subsoil. Topsoil shall be stripped from areas where mounds of subsoil are to be stored.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

36. All stored topsoil, subsoil over or underburden (soil substitute material) mounds shall be constructed with the minimum compaction necessary to ensure stability. The storage mounds shall be shaped to avoid the collection of water in surface undulations.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

37. No storage mounds shall be traversed by heavy vehicles or machinery except where necessary for purposes of mound construction or maintenance.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

38. Topsoil storage mounds shall not exceed 3 metres in height. Subsoil mounds shall not exceed 5 metres in height. Subsoil substitute mounds shall not exceed five metres in height and overburden bunds shall not exceed 7 metres in height, unless otherwise agreed in writing with the County Planning Authority.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

39. All storage mounds that remain in situ for more than six months, or over the winter period, shall be grass-seeded. Weed control and other maintenance measures provided for in the landscaping scheme required subject to Condition No. 43 shall be carried out for the duration of restoration material storage. The seed mixture and application rates shall be agreed in writing with the County Planning Authority no less than one month before the completion of the construction of the first storage bund.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and to protect the

amenities of the area (Buckinghamshire Minerals and Waste Local Plan Policy 28 and 31).

Restoration

40. Each phase to be restored to woodland shall be capped and covered with a minimum depth of one metre of suitable material which shall include a minimum depth of 700mm of subsoil or other approved substitute material and then a 300mm of topsoil.

Reason: To ensure the satisfactory restoration of the site (Buckinghamshire Minerals and Waste Local Plan Policy 31)

41. Before the fill material in any phase is within one metre of the final pre-settlement levels, profile markers shall be erected in that phase to show final levels of fill material, capping material, subsoil and topsoil respectively.

Reason: To ensure the satisfactory restoration of the site (Buckinghamshire Minerals and Waste Local Plan Policy 31).

42. The following operations shall be carried out over the filled areas to be restored prior to the placement of topsoil:

- i) All depressions and hollows shall be filled with subsoils or approved subsoil substitute material to achieve even gradients;
- ii) Subsoil or approved subsoil substitute material shall be ripped or deeply cultivated in dry conditions to break up any compaction, using equipment and to depths and centres to be agreed in writing with the County Planning Authority prior to the commencement of ripping;
- iii) The top 1000mm shall be free of large solid objects (of a size greater than 150mm in any direction) and voids left by the removal of obstructions shall be backfilled with subsoil.

Reason: To ensure the satisfactory restoration of the site (Buckinghamshire Minerals and Waste Local Plan Policy 31).

Landscaping

43. No phase shall commence until a detailed landscaping scheme (including the details set out on approved drawing M12.162(g).D.005 - Concept Restoration to Agriculture (Infill with inert Recovery Materials) has been submitted to and approved in writing by the County Planning Authority. The scheme shall include the following details for that phase:

- i) Details of existing planting to be retained; including location and proposed protection measures;
- ii) Details of size and species of trees and shrubs to be planted;
- iii) Location of planting of new trees and shrubs;
- iv) Protection zones between all retained vegetation and proposed excavations and stockpiles;
- v) A fully detailed planting proposal and specification using locally occurring indigenous species, stating the species, size at time of planting, planting spacing/densities, total plant numbers and planting protection/fencing. Hedgerow trees should be included within hedgerows. Areas of grass seeding outside of the agricultural fields should be covered by the proposal and specification. Plants should be of local provenance;

- vi) Protection measures to be provided to new planting;
- vii) Location and details of fencing;
- viii) Five year programme of maintenance of existing and proposed new planting, including that any trees or shrubs which are damaged, become diseased or die during the development permitted by this consent or during the aftercare period, shall be replaced in the following planting season in accordance with the details submitted in the landscaping protection and maintenance scheme.
- ix) Programme for implementation including phasing to show progressive landscaping restoration proposals.

The scheme shall then be implemented in accordance with the approved programme of implementation.

Reason: To ensure the satisfactory restoration of the site in the interests of local amenity (Buckinghamshire Minerals and waste Local Plan Policies 28 and 31).

44. Prior to the commencement of the development hereby permitted a detailed arboricultural method statement (AMS) for the entire site and for each phase shall be submitted to and approved in writing by the County Planning Authority. It shall make provision for regular arboricultural supervision to be carried out throughout the works to ensure the protective measures are adhered to and regular reports shall be submitted to the County Planning Authority to confirm the effectiveness of all agreed tree protection measures and that they are being correctly observed by the applicant.

Reason: To ensure the satisfactory restoration of the site (Buckinghamshire Minerals and waste Local Plan Policy 31).

Aftercare

45. Within three months of the date of the final replacement of topsoil on any phase to be restored in whole or in part to amenity use (and subsequent to the period of interim restoration), an aftercare scheme for a period of five years for that area shall be submitted to and approved in writing by the County Planning Authority. The scheme shall include the annual aftercare programme which shall be carried out in the first year of the aftercare period. Each year within four weeks of the annual site meeting required by Condition No. 46 (ix), a revised annual aftercare programme shall be submitted to the County Planning Authority showing the aftercare measures which shall be carried out in the following year. Following approval in writing of the annual aftercare programme by the County Planning Authority the annual aftercare programme shall be implemented for the following 12 months.

Reason: To ensure the satisfactory restoration of the site (Buckinghamshire Minerals and waste Local Plan Policy 31)

46. The first annual aftercare programme, and subsequent annual revised programmes, shall provide for:

- i) The removal of any large stones from the surface;
- ii) The making up of any low spots with topsoil;
- iii) The provision of a drainage scheme if required to be constructed following the annual aftercare meeting. Further details of the type, depth and spacing of drains, ditches and outfalls shall be agreed in writing with the County Planning Authority, In subsequent years of the aftercare period measures to maintain and repair the drainage system shall be taken;

- iv) An analysis of the soil acidity and nutrient deficiency;
- v) The cropping, fertilisation and drainage measures to correct acidity and nutrient deficiency and to improve soil structure to achieve a good state of cultivation and fertility;
- vi) The provision of hedges, trees and fences agreed with the County Planning Authority to provide for the efficient framing of the land and appearance of the landscape. In subsequent years of the aftercare period, measures to maintain the hedgerows, trees and fences, and replace any dead or diseased trees or shrubs, shall be taken;
- vii) The maintenance and/or provision of such means of access to, and within, the site as agreed with the County Planning Authority to be necessary for the efficient farming of the land;
- viii) The provision of such field water supplies as agreed with the County Planning Authority to be necessary for the efficient farming of the land;
- ix) An annual site meeting which will be attended by representatives of the developer, and the County Planning Authority.

Reason: To ensure the satisfactory restoration of the site (Buckinghamshire Minerals and waste Local Plan Policy 31)

Pollution Prevention and Control

47. The development hereby permitted shall not be commenced until such time as a scheme for each of the following areas of concern has been submitted to, and approved in writing by, the County Planning Authority.

- the storage of materials;
- the storage of chemicals;
- the storage of oil;
- the storage of hazardous materials;
- the proposed method of working;
- the provision of road and wheel cleaning facilities;
- proposed scheme for monitoring of groundwater levels and groundwater quality as the existing boreholes are lost during extraction;
- measures taken to protect existing licensed groundwater supplies likely to be affected by the proposed works

Any such scheme shall be supported, where necessary, by detailed calculations; include a maintenance programme; and establish current and future ownership of the facilities to be provided. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or any details as may subsequently be agreed, in writing, by the County Planning Authority.

Reason: Protection of the water environment is a material planning consideration and development proposals, including mineral extraction, should ensure that new development does not harm the water environment or increase the potential for groundwater flooding.

48. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the County Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect groundwater from pollution.

49. The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul and surface water has been submitted to, and approved in writing by, the County Planning Authority. The scheme shall be implemented as approved.

Reason: To prevent the pollution of surface water.

Ecology

50. No development shall take place until a scheme for the provision and management of a 16 metre wide ecological buffer zone alongside the Rusholt Brook shall be submitted to and agreed in writing by the County Planning Authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The buffer zone scheme shall be free from built development including lighting and formal landscaping; and could form a vital part of green infrastructure provision. The schemes shall include: plans showing the extent and layout of the buffer zone; details of any proposed planting scheme (for example, native species); details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan; and details of any proposed footpaths, fencing, lighting etc.

Reason: Development that encroaches on watercourses has a potentially severe impact on their ecological value. Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected and to comply with the Buckinghamshire Minerals and Waste Core Strategy Policy SO10, Policy CS19 and Policy CS23.

51. No development shall take place until a Management Plan and Restoration Plan to ensure that the co-ordination of all phases of development and restoration does not lead to any loss of wildlife populations, sub-optimal conditions for wildlife and provides for net gain for biodiversity.

Reason: To ensure that the co-ordination of all phases of development and restoration to ensure a net gain for biodiversity and to comply with the Buckinghamshire Minerals and Waste Core Strategy Policy SO10, Policy CS19 and Policy CS23.

Archaeology

52. No development shall take place until the applicant, or their agents or successors in title, have undertaken archaeological evaluation in form of a geophysical survey and trial trenching in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the County Planning Authority. Where significant archaeological remains are confirmed these will be preserved in situ.

Reason: In order to ensure completion of the archaeological evaluation and safeguard archaeological remains discovered (Buckinghamshire Minerals and Waste Local Plan Policy 24)

53. No development shall take place until the applicant, or their agents or successors in title, have produced a Geoarchaeological Deposit Model to inform areas of high potential for Palaeolithic and Mesolithic/Neolithic sites in accordance with a written scheme of investigation which has been submitted by the applicant and approved by

the County Planning Authority. The high potential areas will be evaluated and where significant archaeological remains are confirmed these will be preserved in situ.

Reason: In order to ensure completion of the archaeological evaluation and safeguard archaeological remains discovered (Buckinghamshire Minerals and Waste Local Plan Policy 24)

54. Where significant archaeological remains are confirmed, no development shall take place until the applicant, or their agents or successors in title, have provided an appropriate methodology for their preservation in situ which has been submitted by the applicant and approved by the County Planning Authority.

Reason: In order to ensure completion of the archaeological evaluation and safeguard archaeological remains discovered (Buckinghamshire Minerals and Waste Local Plan Policy 24)

55. Where archaeological remains are recorded by evaluation and are not of sufficient significance to warrant preservation in situ but are worthy of recording no development shall take place until the applicant, or their agents or successors in title, have secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the County Planning Authority.

Reason: In order to ensure completion of the archaeological evaluation and safeguard archaeological remains discovered (Buckinghamshire Minerals and Waste Local Plan Policy 24)

Rights of Way

56. No part of the development shall commence until details have been submitted to and approved in writing by the County Planning Authority and implemented for the provision of warning signs which shall be erected and maintained at points where Public Footpath No 25 is crossed by the site access roads, to advise pedestrians and on-site vehicle drivers prior to the commencement of mineral extraction.

Reason: In the interests of safety of users of public rights of way and permissive paths in compliance with Buckinghamshire Minerals and Waste Local Plan Policy 28).

57. No part of the development shall commence until a scheme has been submitted to and approved in writing by the County Planning Authority and implemented to fence alongside Footpath 25 Denham Parish with a view to removing unnecessary barriers and creating a corridor width of at least 4 metres where the footpath falls within the application boundary.

Reason: In order to encourage continued use of the Footpath 25 Denham Parish in light of the notable adverse significant level of effect on the footpath as a result of the development in compliance with Buckinghamshire Minerals and Waste Local Plan Policy 28.

58. No part of the development shall be commenced until the design details of the bridge to be constructed over the sand and gravel conveyor along Public Footpath 25 Denham Parish, which shall be of a suitable width to accommodate pushchairs and mobility scooters and compliant with Design Manual for Roads and Bridges, Vol. 2, Section 2 (special structures), Part 8, BD29/04, has been submitted to and approved in writing by the County Planning Authority. No works on the installation of the

conveyor shall commence until the approved bridge installation has been completed and is available to users of the Footpath 25 Denham Parish.

Reason: In order to minimise danger, obstruction and inconvenience to users of the public footpath and of the development in compliance with Buckinghamshire Minerals and Waste Local Plan Policy 28.

Tree Protection

59. Compliance checks to determine the effectiveness of the tree protection fencing shall be carried out at regular intervals throughout the duration of the works and details submitted to the County Planning Authority by 31 January each year for the duration of the works on site.

Reason: To ensure adequate protection of trees.

60. Appropriate signage shall be attached to the tree protection fencing prior to works commencing to deter entry to these areas, as stated in BS5837:2012. This signage shall not be removed without prior written consent from the County Planning Authority.

Reason: To ensure adequate protection of trees.

Informatives

Ecology

It is noted that the hedge H5 is still unprotected within the plan, along the western aspect of the section situated upon the site boundary (north of T4). It is recommended that this minor omission be included in the plans when handing over to contractors for the fence installation works.

Environmental Permit - Main Rivers

This development may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of the Rusholt Brook, designated a 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. This may include a 16 metre buffer for any main river for quarrying and extraction of minerals.

Ordinary Watercourses

Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, the prior consent of the Lead Local Flood Authority (Buckinghamshire County Council) is required for any proposed works or structures, in ordinary watercourses (non-main rivers). This is also required if you are discharging to an ordinary watercourse.

Environmental Permit - Controlled Waste

This development must comply with the Environmental Permitting (England and Wales) Regulations 2010 (as amended) and will require an Environmental Permit

issued by the Environment Agency. The applicant has indicated they anticipate this will continue to be regarded as a "Waste Recovery" operation, however subsequent to the recent Methley Quarry Case at the court of appeal, this is unlikely to be granted a recovery permit, therefore will be regarded as a Disposal operation and the application for the Environmental Permit will need to demonstrate the development will comply with the Landfill Directive and relevant sector guidance and will not pose a risk to the environment or human health. The applicant is advised to contact Rob Devonshire on 0203 025 9152 to discuss the issues likely to be raised.

Environmental Permit - Foul Drainage

The foul drainage (including grey water) and contaminated surface water associated with this development will require an Environmental Permit under the Environmental Permitting Regulations 2010, from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency on 08708 506 506 for further advice and to discuss the issues likely to be raised. You should be aware that the permit may not be granted. Additional 'Environmental Permitting Guidance' can be accessed via our main website (<http://www.environment-agency.gov.uk>).

Environmental Permit - Discharge of Treated Sewage Effluent

If you wish to discharge treated sewage effluent into a surface water or to ground you may require an Environmental Permit from us. This also applies to the discharge of grey water. In some cases you may be able to register an exemption. You should apply online at <http://www.environment-agency.gov.uk/business/topics/permitting> or contact us for an Environmental Permit application form and further details on 08708 506506. The granting of planning permission does not guarantee the granting of a permit under the Environmental Permitting Regulations 2010. A permit will be granted where the risk to the environment is acceptable. To qualify for a registered exemption the rate of sewage effluent discharge must be 2 cubic metres a day or less to ground or 5 cubic metres a day or less to watercourse. You must also be able to satisfy a number of specific criteria. A Standard Rules Permit is available for discharges of secondary treated sewage (to surface water only) of between 5 cubic metres a day and 20 cubic metres a day. Discharges of treated sewage greater than 2 cubic metres a day to ground and greater than 20 cubic metres a day to a surface water require a Bespoke Permit.

Advice to Applicant

Advice to Applicant About Piling

Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution. A piling risk assessment should be submitted with consideration of the EA guidance

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf>

Surface Water Flood Risk

The Town and Country Planning (Development Management Procedure) (England) Order changed on 15 April 2015. The statutory responsibility to provide comments on surface water drainage proposals for major applications has passed to the relevant Lead Local Flood Authority (LLFA) from this date. In this case the LLFA is Buckinghamshire County Council.

Oil Storage

Any facilities for the storage of oils, fuels or chemicals, shall be provided with secondary containment that is impermeable to the oil, fuel or chemical and water, for example a bund. The minimum volume of the secondary containment should be at least equivalent to the capacity of the tank plus 10%. If there is more than one tank in the secondary containment the capacity of the containment should be at least the capacity of the largest tank plus 10% or 25% of the total tank capacity, whichever is greatest. All fill points, vents, gauges and sight gauge must be located within the secondary containment. The secondary containment shall have no opening used to drain the system. Associated above ground pipework should be protected from accidental damage. Below ground pipework should have no mechanical joints, except at inspection hatches and either leak detection equipment installed or regular leak checks. All fill points and tank vent pipe outlets should be detailed to discharge downwards into the bund. This is a requirement of the Control of Pollution (Oil Storage) (England) Regulations 2001.

Licensed Abstractions

Section 3.1.4 of the Hydrogeological and Hydrological Assessment considers the impact of the proposed extension on any licensed abstractions within "the vicinity of the application" (Page 13, Section 3.1.4). The vicinity considered isn't identified, however, the furthest licensed abstraction highlighted is approximately 220m West of western boundary (28/39/28/0593/R01). There is an additional surface water licenced abstraction (28/39/28/0079) approximately 300m South West of the application site licensed to take water out of the Alder Bourne. The applicant should consider the risk of impact on this licence holder, instigating mitigation measures as necessary.

Unlicensed Abstractions

Within Section 3.1.4 of the Hydrogeological and Hydrological Assessment, the applicant has referred to potential impacts on licensed abstractions and the unlicensed abstraction currently occurring on site. However, no reference has been made to the possibility of additional unlicensed abstraction outside of the site. The Environment Agency does not hold information on unlicensed abstractions which could include domestic borehole supplies. The applicant can contact the local District Council for any records they may hold.

Water Requirement - Dust Management

The Environmental Statement mentions the "dampening of haulage routes" (Page 18, Section 5: Local Amenity) whilst the Dust Mitigation and Management Section (Section 8) of PA Vol 2.2.7 Air Quality Assessment document has multiple references to the use of water for dust management, suppression and wheel washing throughout the mineral extraction process (Page 22 - Section 8.1.1, Section 8.1.2; Page 23 - Section 8.1.5, Section 8.1.6). The proposed New Denham Quarry Northern Extension is situated within the River Colne catchment. The Environment Agency has published the licensing policies for managing abstractions in the Colne CAMS area. This document can be downloaded at:

<https://www.gov.uk/government/publications/colne-catchment-abstraction-licensing-strategy>.

The licensing strategy divides abstractions into consumptive and non-consumptive activities. Mineral washing is normally considered to be non-consumptive subject to

the actual process involved. Water used for dust suppression/management and concrete production is considered to be consumptive. The licensing strategy for the Colne catchment does not permit new consumptive abstractions proposals. All non-consumptive abstraction proposals are subject to a local assessment before a decision is made on any licensing proposal. The current licence held by Summerleaze Ltd (TH/039/0028/035) is for the purpose of non-consumptive mineral washing only and, as a result, water abstracted under this licence in its current version cannot be used for dust management. The applicant has not indicated the intended source of their additional water requirements. Our assumption is that this will be from mains water supply via the local water company. Where this is not the case, we would ask the applicant to contact us directly to discuss their licensing needs. The applicant is advised to contact Alastair Wilson (Environment Planning Specialist, Water Resources) on 0203 025 8953 or via email at alastair.wilson@environment-agency.gov.uk. The Hydrogeological and Hydrological Assessment indicates that the onsite concrete plant, operated by London Concrete, is supplied by an unlicensed abstraction from the Chalk aquifer, with the abstraction rate lower than 20m³/day (Page 13, Section 3.1.4). We would also like to highlight that the unlicensed 20m³/day volume is for activities undertaken by London Concrete on the whole site, irrespective of the number of unlicensed abstraction points. If the requirement for water exceeds 20m³/day then we would ask London Concrete to contact us directly to discuss their licensing requirements using the details above.

Overall Period of Development - Licence Implications

The Non-Technical Summary states that the northern extension would "extend the life of the mineral extraction until 2024", with the proposal to extend the life of the quarry until 31 December 2026 (Overall Period of Development, Page 8). The potential approval of the HOAC scheme would "add an estimated 18 months to the overall working and restoration period", proposing to "extend the life of the quarry until 31 December 2028" (Overall Period of Development, Page 8). We would like to highlight to the applicant that the current water abstraction licence associated with the site expires on 31 March 2026. If mineral extraction is intending to progress after this date, then the licence holder would need to renew their licence. Licence Holders are requested to apply for a renewal at least 3 months prior to the expiration date of their licence. Licence holders can apply to vary a licence at any time. Details and guidance of this process, and the policies the Environment Agency follows when determining renewals, along with local abstraction licence strategies, can be found online (available here: <https://www.gov.uk/topic/environmental-management/water>).