



## Report to Strategic Planning Committee

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<b>Application Number:</b>	CM/0003/23
<b>Proposal:</b>	Mineral extraction with low level restoration to lakes, woodland and grassland, as an eastern extension to New Denham Quarry.
<b>Site Location:</b>	New Denham Quarry Denham Road Denham Buckinghamshire UB9 4EH
<b>Applicant:</b>	Summerleaze Ltd
<b>Case Officer:</b>	James Suter
<b>Ward(s) affected:</b>	Denham
<b>Parish-Town Council:</b>	Denham Parish Council
<b>Date valid application received:</b>	8th March 2023
<b>Statutory determination date:</b>	7th June 2023
<b>Recommendation</b>	Subject to the submission of an updated composite restoration scheme drawing for New Denham Quarry it is recommended that the application ref: CM/0003/23 is APPROVED subject to the imposition of planning conditions broadly in accordance with the details set out in this report, suitable planning obligations securing use of EURO 6 compliant vehicles and the implementation of a Bird Hazard Management Plan.

## **1.0 Summary & Recommendation/ Reason for Planning Committee Consideration**

- 1.1 The application seeks permission for the extraction of sand and gravel with low level restoration to lakes, woodland and grassland, as an eastern extension to New Denham Quarry.
- 1.2 The key issues for determining this proposal include the principle of the development, impacts upon landscape, impacts upon amenity and impacts upon the Green Belt.
- 1.3 Members of the Strategic Sites Committee are advised that whilst Buckinghamshire Council has an interest in the land the Council (BC) are the Local Planning Authority with responsibility for regulating the development of land. Members will be aware of the need to consider planning applications under the legislative framework, (including but not exclusively Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and The Town and Country Planning (Environmental Impact Assessment) Regulations 2017) in coming to a decision on the proposals, and to only determine the proposals on the basis of the relevant planning issues.
- 1.4 Subject to the submission of an updated composite restoration scheme drawing for New Denham Quarry it is recommended that the application ref: CM/0003/23 is APPROVED subject to the imposition of planning conditions broadly in accordance with the details set out in this report, suitable planning obligations securing use of EURO 6 compliant vehicles and the implementation of a Bird Hazard Management Plan.

## **2.0 Description of Site**

- 2.1 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 (see Appendix B).
- 2.2 The planning application comprises an area of circa 17ha including a new extraction area covering approximately 5ha including buffers. The rest of the application site comprises the existing processing plant, stocking area, conveyor and access.
- 2.3 The additional land for mineral working lies east of the main quarry and processing area and is bordered to the east by Knighton-Way Lane, to the north by footpath DEN/25/1 and to the south by an electrical substation.
- 2.4 The nearest dwellings to the site are those on Knighton-Way Lane which lie approximately 10m from the nearest site boundary and 50m from the extraction boundary. Field Cottage lies approximately 125m south of the extension area. Southlands Manor lies 60m west of the existing quarry processing area (450m west of the extension area). Brickfield Cottage lies approximately 50m north of the site.

- 2.5 Proximal listed buildings include Southlands Manor and Barn to North East of Southlands Manor (Grade II). Uxbridge Lock conservation area lies approximately 450m east of the site.
- 2.6 The site is located within an aerodrome bird-strike safeguarding zone for Heathrow Airport and a safeguarding zone for RAF Northolt.
- 2.7 There are three Local Nature Reserves (LNR) and three Sites of Special Scientific Interest (SSSI) within 2km of the site. These are Frays Valley LNR , Denham County Park LNR, Denham Quarry Park LNR, Fray's Farm Meadows SSSI, Denham Lock Wood SSSI and Kingcup Meadows and Oldhouse Wood SSSI.
- 2.8 There are two designated Air Quality Management Areas (AQMA) for NO<sub>2</sub> within close proximity to the site. AQMA 1 comprises a section of the M25, M40, M4 and AQMA 2 which runs south of the site and includes Iver Heath.
- 2.9 New Denham lies northeast of the proposed extension area.
- 2.10 The proposal area is within Flood Zone 1 which has the lowest risk of flooding. The Rusholt Brook runs north-west to south-east between the processing plant area and the eastern extension area. The site lies within the flood zone for the maximum extent of flooding from reservoirs when there is also flooding from rivers.
- 2.11 Pylons / electricity lines run across the site from south-west to northeast.
- 2.12 The nearest trees subject to a Tree Protection Order are approximately 500m from the site.
- 2.13 At the time of writing, the northern extension (permitted under application ref: CM/23/16) is still being worked and the processing area and access still in use. At present these are required to be removed and the area restored by 31<sup>st</sup> December 2026.

### **3.0 Description of Proposed Development**

- 3.1 The proposal comprises an area of circa 17ha including 3.85ha of additional extraction area. It is proposed circa 290,000 tonnes of sand and gravel would be 'wet-worked' extracted with the site subsequently restored to a lake, tussocky grassland, species rich meadow, hedgerows and broad-leaved woodland.
- 3.2 It is proposed the site would be worked following the extraction within the northern extension area permitted under application ref: CM/23/16 and would be supported by the existing infrastructure including the processing area, site offices, stockpiling areas, weighbridge, staff buildings and concrete batching plant.
- 3.3 The as dug mineral from the proposal area would be transported via conveyor to the existing processing plant where sands and gravels will be washed and screened ready for sale off site.

- 3.4 It is proposed that the site would be accessed via the existing quarry access onto the A412 roundabout.
- 3.5 At present the northern extension permission allowed for extraction of phase 5 (which underlies the processing area, site office, stockpiling areas, weighbridge, staff buildings and concrete batching plant) to be carried out following completion of extraction works within the northern extension area. All plant and machinery are required to be removed and the land required to be restored no later than 31<sup>st</sup> December 2026 under the extant permissions.
- 3.6 The application would in effect add an additional area to be extracted and restored prior to the working of the processing area (phase 5).
- 3.7 The site would be worked as one phase from south to north and would be worked 'wet' with no artificial lowering of groundwater level proposed. Stripped soils would be placed around the perimeter of the site for storage prior to use in restoration. These would comprise bunds approximately 3m high on the eastern boundary, and 2m high on the northern boundary.
- 3.8 Rolling restoration is proposed to be completed within 6 months of final extraction.
- 3.9 The site would be restored to a 'lower-level' design utilising site derived materials with no import of material for restoration purposes. The proposed lake would have a maximum depth of 4m.
- 3.10 It is estimated that the works within the extension area would be carried out within circa 24 months in total. It is estimated that to complete the restoration within the existing plant area would take a further 24 months to complete.
- 3.11 HGV movements are proposed to be within the existing limit for the quarry of 296 HGV movements per day (148 in and 148 out).
- 3.12 Due to proximity to residences the proposed extension area is proposed to have reduced hours of operation in comparison to the existing quarry. It is proposed to operate from 8am to 6pm Monday to Friday with no operations other than those for essential maintenance on Saturdays, Sundays and Public / Bank Holidays.

#### 4.0 Relevant Planning History

- 4.1 The planning history for the quarry is summarised in the below table.

Reference	Development	Decision	Decision Date
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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	PER	March 2007
10/01665/CC	Proposed use of land for recycling and recovery of construction, demolition and excavation materials and soils including minor amendment of approved quarry phasing scheme	PER	22 December 2010
11/01460/CM	Proposed 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	PER	9 September 2013
CM/32/14	Extension into Field Cottage buffer area for the extraction of sand and gravel reserves and restoration to land using quarry overburden and recovery materials	PER	10 June 2014

	(to be referred to as 'Phase 4C')		
CM/22/16	Extension of existing sand gravel extraction and restoration for relocation of Hillingdon Outdoor Activities Centre (HOAC)	PER	14 March 2007
CM/23/16	Northern Extension to existing sand and gravel extraction	PER	31 March 2017
CM/0004/21	Variation of conditions 1, 5 and 73 attached to planning consent 11/01460/CM to vary the quarry restoration scheme at New Denham Quarry.	PCO	
NMA/0015/22	Non-Material Amendment to planning permission ref: CM/23/16 to vary Working and Restoration schemes at New Denham Quarry, Denham Road, Denham, Buckinghamshire, UB9 4EH	NMAP	24 November 2022

4.2 The development has been screened under the Environmental Impact Assessment Regulations and the local planning authority has concluded that an environmental impact assessment will not be required in this case.

## 5.0 Policy Considerations and Evaluation

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.

5.2 The development plan for this area comprises of:

- Buckinghamshire Minerals and Waste Local Plan 2016-2036 (BMWLP)
- South Bucks District Local Plan (SBDLP) 1999
- The Denham Neighbourhood Plan (adopted January 2022)
- South Bucks District Core Strategy (SBCS) 2011.

5.3 Documents that need to be considered in determining this development:

- National Planning Policy Framework (NPPF)
- National Planning Policy for Waste (NPPW)
- Chiltern and South Bucks Local Plan 2036

5.4 The following policies are considered to be relevant to this development:

### **Buckinghamshire Minerals and Waste Local Plan (2016-2036)**

- *Policy 1: Safeguarding Mineral Resources*
- *Policy 2: Spatial Strategy for Minerals Development*
- *Policy 3: Sand and Gravel Provision*
- *Policy 4: Allocated Sites for Sand and Gravel Provision*
- *Policy 5: Development Principles for Mineral Extraction*
- *Policy 16: Managing Impacts upon Amenity and Natural Resources*
- *Policy 17: Sustainable Transport*
- *Policy 18: Natural Environment*
- *Policy 19: Historic Environment*
- *Policy 20: Landscape Character*
- *Policy 21: Green Belt*
- *Policy 23: Design and Climate Change*
- *Policy 25: Delivering High Quality Restoration and Aftercare*
- *Policy 28: Implementation*
- *Policy 26: Safeguarding of Minerals Development and Waste Management*

### **South Bucks District Local Plan (SBDLP)**

- *Policy GB1 - Green Belt;*
- *Policy EP3 - The Use, Design and Layout of Development;*
- *Policy EP4 - Landscaping;*
- *Policy TR5 - Accesses, Highway Works and Traffic Generation;*
- *Policy TR7 - Parking Provision*
- *Policy EP17 - Aerodrome / Air Traffic Safeguarding*
- *Policy TR10 - Heavy Goods Vehicles.*

### **South Bucks Core Strategy (SBCS)**

- *Core Policy 5 - Open Space, Sport and Recreation (CP5)*
- *Core Policy 6 - Local Infrastructure Needs (CP6)*
- *Core Policy 7 - Accessibility and Transport (CP7)*
- *Core Policy 8 – Built and Historic Environment*
- *Core Policy 9 - Natural Environment*
- *Core Policy 13 – Environmental and Resource Management (CP13)*

### **Denham Neighbourhood Plan (DNP)**

5.5 Section 38 B of the Planning and Compulsory Purchase Act 2004 makes clear that a Neighbourhood Plan may not include provision about development that is excluded development. The definition of 'excluded development' is the same as that given under section 61K of the Town and Country Planning Act 1990 (as amended). Thus, there is no jurisdiction to make policies within a Neighbourhood Plan which relate to the winning and working of minerals. It is therefore considered that the Denham Neighbourhood Plan 2021 (DNP) policies do not form part of the development plan for the purpose of considering this application.

## **6.0 Principle of Development**

Policy 1: Safeguarding Mineral Resources

Policy 2: Spatial Strategy for Minerals Development

Policy 3: Sand and Gravel Provision

Policy 4: Allocated Sites for Sand and Gravel Provision

Policy 5: Development Principles for Mineral Extraction



Policy 11: Waste Management Capacity Needs

Policy 12: Disposal to Landfill

Policy 13: Spatial Strategy for Waste Management

Policy 14: Development Principles for Waste Management Facilities

Policy 16: Managing Impacts on Amenity and Natural Resources

Policy 25: Delivering High Quality Restoration and Aftercare

- 6.1 Policy 1 of the BMWLP looks to safeguard mineral resources from being sterilised by non-mineral development and establishes Mineral Safeguarding Areas (MSAs) within the county. This policy mirrors paragraph 210 of the NPPF. This application is within the county's MSAs but explicitly seeks to extract the safeguarded mineral underlying the site. As such it is considered the proposal is fully in accordance with the policy.
- 6.2 Policy 2 of the BMWLP sets out the spatial strategy for minerals development in Buckinghamshire. With relevance to this application, the policy seeks to focus sand and gravel extraction primarily in the Thames and Colne Valleys but with a secondary focus in the Great Ouse Valley east of Buckingham. The site is located within the Colne Valley.
- 6.3 Policy 3 of the BMWLP states provision will be made over the plan period for the extraction of 0.81 mtpa of sand and gravel from the Colne and Thames Valleys (primary focus area). The policy adds that the maintenance of a landbank for sand and gravel equivalent to at least 7 years supply will be sought to ensure a steady and adequate supply. The policy states provision will come from sites with planning permission, extensions to existing sites and from new sites in line with the spatial strategy for mineral extraction. The policy concludes stating that within the Thames and Colne Valleys this provision may be phased to manage supply levels over the plan period and avoid cumulative adverse impacts.
- 6.4 The Local Aggregates Assessment (LAA) for the year of 2021 is the council's most recently published LAA at this time. This assessment found that the county has a landbank of 5.2 years as of 31st December 2021 and a provision rate of 1.12Mt pa.
- 6.5 Since 31st December 2021 no new sand and gravel extraction permissions have been granted. However, notably application ref: CM/0049/21 (Land At Sutton Court Farm North Park Langley SL3 8AU) has been to committee and was given a recommendation of approval subject to a s106 agreement being signed and appropriate conditions being attached. That scheme would provide circa 1Mt of sand and gravel to the landbank. Similarly, the extraction of approximately 173,000 tonnes of sand and gravel under application ref: CM/0036/21 (Land Adjacent To M25, Between Junctions 15 & 16, Iver Heath) Buckinghamshire has been given a recommendation for approval from committee subject to stipulations being met.

- 6.6 Regardless of the above additions to the landbank the county is unable to evidence a seven-year supply as required by policy. The proposal would yield 290,000 tonnes of sand and gravel and contribute to the landbank.
- 6.7 The NPPG identifies that where a landbank is below the minimum level this may be seen as a strong indicator of urgent need (Paragraph: 084 Reference ID: 27-084-20140306).
- 6.8 Policy 4 of the BMWLP sets out the allocated sites for sand and gravel provision within the county over the plan period. The site is primarily located within site M3. However, the application site boundary and the extraction limit proposed differ slightly from the area allocated as site M3 under the plan.
- 6.9 Responding to queries the applicant noted that both site M3 and the proposal area are an eastern extension to Denham Quarry, of similar location and size both in area and yield. The applicant notes that the allocated area did not propose any working below the powerline traversing the site, but these operations would now be acceptable with safe working practices adopted. Another difference between the allocated site boundary and proposal site is that the allocated site sought to work further south toward Field Cottage. This was proposed to redirect the Rusholt Brook to the west but instead the brook has been retained on its alignment across the north and east side of Field Cottage and therefore the extraction boundary has been amended to avoid disruption to the brook.
- 6.10 Policy 5 of the BMWLP sets out that proposals for the extraction of minerals from unallocated sites must demonstrate that the development:
- a) is in general compliance with the spatial strategy for minerals development and where relating to sand and gravel; and
  - b) is required to maintain a steady and adequate supply of minerals in accordance with the adopted MWLP provision rates and/or the maintenance of a landbank with reference made to the findings of the prevailing Local Aggregate Assessment (LLA); and
  - c) and is required to provide materials of a specification that cannot reasonably or would not otherwise be met from committed or allocated reserves.
- 6.11 The proposal would meet parts a) and b) of the policy but not part c). Whilst this conflict is noted the proposal site as described above largely overlaps with the previously allocated area. It is prudent to ensure that as much resource is possible is extracted from allocations. Whilst extraction beyond the eastern boundary of the allocation raises the above potential conflict with policy, subject to not causing unacceptable impacts this would ensure that mineral underlying this area is not rendered impractical / unfeasible to extract in the future. This would be fully in accordance with policy aims to avoid unnecessary sterilisation of safeguarded mineral resources.

6.12 In view of the above, it is considered that the proposal aligns with the spatial strategy for mineral development. With regards to need the proposal would provide a contribution towards the landbank which is a matter of substantial significance that should, in accordance with paragraph 211 of the NPPF, be given great weight.

#### Restoration

6.13 Policy 25 of the BMWLP similarly requires minerals development of a temporary nature must include a restoration scheme that will result in the site being progressively restored to an acceptable condition and stable landform as soon as is practicable and provide for high quality aftercare arrangements including ongoing management and monitoring where necessary.

6.14 The policy adds that the after-use of a site will be determined in relation to the land-use context and surrounding environmental character and should take into account landowner interests and the requirements of the local community. Schemes should include objectives that will contribute towards: biodiversity gains, enhancement of the local environment and amenity, climate change mitigation and adaptation, benefits for the local community and economy (as appropriate).

6.15 The policy then notes that where relevant, the restoration of the site must accord with a number of requirements:

- Sites that are to be restored to the previous land-use must include a secondary after-use that includes environmental enhancement. Where a site is located within best and most versatile agricultural land, the land should be restored to a condition where the long-term potential of the land is safeguarded and soil resources are conserved, however this does not preclude the requirement for incorporating a secondary after-use.
- Where specific and favourable conditions occur and when adjacent to identified habitat or designated asset(s), precedence must be given to environmental enhancement objectives, the creation of Biodiversity Action Plan habitat, ecological networks, promotion of geodiversity and enhancement of the historic environment.
- Sites located within river corridors should address flood risk management and support River Basin Management Plan actions.
- Sites located within or adjacent to the Colne Valley Regional Park or the Green Belt should seek to enhance the characteristics and qualities for which the area was designated giving consideration to the provision of green infrastructure and opportunities for access and recreation.

6.16 As detailed in section 3 of this report, the site is proposed to be restored to a lake, tussocky grassland, species rich meadow, hedgerows and broad-leaved woodland. This is indicated to result in a biodiversity gain of 109.43% for hedgerows and 76.71% for other habitats. This would also provide opportunities for carbon sequestration.

- 6.17 The restoration scheme is considered to respect and complement the character of the local environment and the rest of the restoration for the wider New Denham Quarry.
- 6.18 With regards to climate change mitigation there would be some carbon sequestration through the proposed planting. With regards to climate change adaptation, the scheme has considered flood risk management and the approach has not been the subject of objection from either the LLFA or Environment Agency.
- 6.19 The site is located within the Green Belt and the Colne Valley Regional Park. Fuller consideration of the Colne Valley Regional Park and Green Belt is set out in their respective sections and within the Landscape and visual impact section of this report. Public access around this area of the overall New Denham Quarry is not proposed but there are other proximal routes through the rest of the quarry.
- 6.20 With respect to the 'best and most versatile land', this definition applies to land graded 1, 2 or 3a on the Agricultural Land Classification. Of the extension area the proposal to restore to a lake, grassland and broad-leaved woodland would result in the loss of 0.4ha of grade 2 land and 4.2ha of grade 3a land. The Agricultural Impact Assessment submitted in support of the application identified that the permanent loss of less than 5ha of agricultural land would be a minor adverse effect.
- 6.21 As the proposal would lead to the loss of approximately 4.6ha of best and most versatile agricultural land, it represents a conflict with the requirements of policy 25. Natural England are only required to be consulted on applications where there would be a loss of 20 ha or more of best and most versatile agricultural land and not in accordance with the development plan.
- 6.22 Overall, it is considered that the restoration scheme is well designed and would be in keeping with the restoration of the wider mineral extraction site which includes a variety of afteruses including water bodies but not intended for intensive agricultural use. Whilst it would result in the loss of an area of best and most versatile agricultural land the proposal meets the other policy requirements and the aims of the policy taken as a whole.

## **7.0 Green Belt**

Policy 21: Green Belt

Policy GB1 - Green Belt

- 7.1 The application site lies entirely within the Green Belt. The NPPF highlights that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open with the essential characteristics of the Green Belt being their openness and permanence.
- 7.2 The purposes of the Green Belt are defined by paragraph 138 of the NPPF:
- a) to check the unrestricted sprawl of large built-up areas;

- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns;
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 7.3 Paragraph 147 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. However, as per paragraph 150 of the NPPF, mineral extraction is not inappropriate in the Green Belt provided it preserves openness and does not conflict with the purpose of the designation. This is reflected by policy 21 of the BMWLP.
- 7.4 Policy 21 of the BMWLP states “Other than those required for the winning of mineral, elements of development considered integral to extractive operations include those associated with access and restoration. Other forms of development, including on-site processing, will be supported where compliant with relevant MWLP policies and national policy.”
- 7.5 Policy GB1 of the SBDLP makes similar provision to policy 21 of the BMWLP stating permission for mineral working and subsequent restoration of the land, in accordance with the Buckinghamshire Replacement Minerals Local Plan (the local plan at the time of which the SBDLP was adopted), would only be forthcoming where:
- i. the proposal would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and would be in accordance with EP3 (Use, Design and Layout of Development); and
  - ii. the scale, height, layout, siting, form, design and materials of any new building would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and the proposal would be in accordance with Policy EP3; and
  - iii. proposals for extensions to existing buildings would harmonise with the scale, height, form and design of the original building; and
  - iv. the proposal would comply with all other relevant policies in this Plan.
- 7.6 In summary, the relevant elements of policy GB1 to this application require the proposal to not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general, require the proposal to accord with policy EP3 of the SBDLP and require the proposal to accord with all other relevant policies of the SBDLP.
- 7.7 To assess impacts of a proposal on openness courts have identified a number of matters which may need to be taken into account in making this assessment.

7.8 The Supreme Court in R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3 provided the following general analysis of openness:

‘The concept of “openness” in Paragraph 90 of the NPPF [the previous version] seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: “to prevent urban sprawl by keeping land permanently open ...”. Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As Planning Policy Guidance (PPG) 2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development. Paragraph 90 shows that some forms of development, including mineral extraction, may in principle be appropriate, and compatible with the concept of openness. A large quarry may not be visually attractive while it lasts, but the minerals can only be extracted where they are found, and the impact is temporary and subject to restoration. Further, as a barrier to urban sprawl a quarry may be regarded in Green Belt policy terms as no less effective than a stretch of agricultural land’ (Paragraph 22)

7.9 The PPG (Paragraph: 001 Reference ID: 64-001-20190722) also advises generally that:

‘Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.’

7.10 It is an accepted planning principle that minerals can only be worked where they are found, and that mineral working is a temporary use of land. Paragraph 150 of the NPPF and policy 21 of the BMWLP taken together further recognise that some operational development associated with mineral extraction can be appropriate within the Green Belt without harming openness and compromising the objectives of the designation.

#### Green Belt Context

7.11 An assessment of Buckinghamshire’s Green Belt was commissioned in 2015 by the former County and District Local Authorities. The Green Belt assessment’s aim was to evaluate and assess the suitability of land designated in the Green Belt and identify

additional land for Green Belt Designation and was used as an aid in the preparation of the since withdrawn Chiltern and South Bucks Local Plan 2036.

7.12 The assessment (known as the stage 1 Green Belt Assessment) identified land parcels across the District and scored them against their performance against the purposes of the Green Belt. The application site falls within land parcel 79.

7.13 Land Parcel 79 in the stage 1 Green Belt Assessment is assessed as a medium performing land parcel in the Green Belt, against Green Belt Purposes. The land parcel performs moderately against Purpose a, to check the unrestricted sprawl of large built-up areas, Purpose b, to prevent neighbouring towns from merging (Iver Heath, New Denham and Uxbridge). The land parcel maintains a largely rural open character, scoring moderately against Purpose c, to assist in safeguarding the countryside against encroachment. The land parcel does not meet Purpose d, to preserve the setting and special character of historic towns.

#### Spatial Impacts

7.14 The proposed development would be carried out on an area of circa 17ha. The proposal includes the utilisation of existing processing and stocking area, concrete plant, site offices, weighbridge and staff facilities at New Denham Quarry. The proposal would include the erection of soil bunds, stockpiling of and extraction of mineral and operation of relevant machinery.

#### Visual Impacts

7.15 The extension area comprises of visually open and undeveloped agricultural land due west of residences along Knighton-Way Lane which form part of the settlement of New Denham.

7.16 The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) which is a tool used to identify and assess the nature and significance of the effects of a proposed development upon the landscape and upon views and visual amenity. Whilst landscape impacts will be further assessed within this report, the LVIA identifies a number of key visual receptors or viewpoints. It is from these viewpoints where impacts in loss of openness within the Green Belt may be experienced.

7.17 Key visual receptors where visual effects as a result of the proposed development would occur, as adjudged by the LVIA, are as follows:

- Users of the rights of way DEN/25/1 and DEN/23/1
- Residential properties along Knighton-Way Lane

#### Degree of Activity

7.18 Over the course of the development there would be the associated vehicle and heavy goods vehicle movements.

#### Duration of Development / Remediability

- 7.19 The impacts of the proposal are temporary in nature. The extension area is projected to be worked over the course of approximately 24 months. The restoration scheme proposed would lead to the lake, tussocky grassland, species rich meadow, hedgerows and broad-leaved woodland being created following completion of extraction operations. This would be a condition which is fully in accordance with the aims of Green Belt policy.

Purposes

- 7.20 Turning to the purposes of the Green Belt, the proposed development would not hinder the objectives of preventing unrestricted urban sprawl, preventing neighbouring towns merging into one another or preserving the setting and character of historic towns. It is not considered that the development is of a type or scale to conflict with the purpose of safeguarding the countryside from encroachment.

Summary

- 7.21 The development put forward under this application is directly related to and/or integral to mineral extraction which is not inappropriate within the Green Belt as set out in both local and national policy subject to the development not harming openness and compromising the objectives of the designation. It is the case that under this application there would be no permanent harm to openness or any encroachment on the Green Belt.
- 7.22 Whilst there may be impacts for the duration of the development it is not considered they would harm the openness of the Green Belt and therefore the development does not conflict with local policies GB1 of the SBDLP and Policy 21 of the BMWLP.

## **8.0 Transport matters and parking**

CP7 - Accessibility and Transport

TR5 - Accesses, Highway Works and Traffic Generation

TR7 - Parking Provision

Policy TR10 - Heavy Goods Vehicles

Policy 17: Sustainable Transport

- 8.1 Policy 17 of the BMWLP requires minerals and waste development to provide a Transport Statement or Assessment. This policy identifies areas to be included within a statement or assessment for mineral development including a travel plan (where applicable). Topics include: likely traffic flows and throughput per day, identification of market base, capacity of highway network to accommodate movements generated, identifications of any improvements deemed necessary to minimise impacts, identification of potentially adverse impacts arising from transport of minerals on the community and environment and mitigation measures, and emission control and reduction measures.



- 8.2 The application is not supported by a Transport Statement in this case. The proposal area would utilise the same access approved for the existing quarry and would be restricted to the same vehicle movement limit.
- 8.3 Core Policy 7 of the SBCS seeks to improve accessibility to services and ensure a safe and sustainable transport network by supporting the rebalancing of the transport system in favour of more sustainable modes of transport, including by encouraging safe and attractive improvements to pedestrian and cyclist routes and facilities.
- 8.4 Policy TR5 of the SBDLP addresses the effect of development on safety, congestion and the environment. The policy requires development: is in accordance with the standards of the Highways Authority, would not cause the operational capacity of the highway to be exceeded nor exacerbate the situation on a highway where the capacity is already exceeded and that traffic movements or the provision of transport infrastructure would not have an adverse effect on the amenities of nearby properties on the use, quality or character of the locality in general, including rural lanes.
- 8.5 The policy also states that where off-site improvements to the highway are required to serve a development, permission will not be granted unless the applicant enters into a planning obligation to secure the implementation of those works.
- 8.6 Policy TR7 sets the parking requirements for development. No specific provision is made for mineral extraction developments. In this case the proposal would utilise existing provision which has been demonstrated to be sufficient to facilitate the excavation of other phases of the overall New Denham Quarry.
- 8.7 Policy TR10 of the SBDLP states that development likely to generate HGV movements will only be permitted where it would not adversely affect the character or amenities of nearby properties or the locality in general, for example through noise, vibration, disturbance or visual intrusion in line with Policy EP3 of the SBDLP. It adds that in the case of a proposal likely to generate a significant number of heavy goods vehicle trips permission will only be granted where the access would not be onto a residential road, rural lane or other road which is not suitable in principle for such traffic, and that vehicles would be able to conveniently access the strategic highway network without using such roads.
- 8.8 Paragraph 111 of the NPPF states that: "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Paragraph 113 states that "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."
- 8.9 The Highway Authority were consulted on the proposal and subject to a condition requiring submission of a revised site layout indicating turning areas and parking

areas for the extension area and a daily HGV movement limit of 296 movements per day being secured hold no objection.

- 8.10 Overall, officers consider that the proposal would not result in any unacceptable impacts in relation to transport matters and parking. The proposal is considered to meet the requirements of above policy subject to conditions.

## 9.0 Amenity of existing and future residents

Policy 16: Managing Impacts on Amenity and Natural Resources

Policy EP3 - The Use, Design and Layout of Development

Policy TR10 – Heavy Goods Vehicles

CP13 Environmental and Resource Management

- 9.1 Policy 16 of the BMWLP seeks to manage impact upon amenity and natural resources. The policy requires minerals and waste development to demonstrate the development is environmentally feasible, secures a good standard of amenity and would not give rise to unacceptable adverse impacts on a number of matters including Human Health and wellbeing and amenity to communities, Air Emissions (including dust), noise, vibration, cumulative impacts, light and visual impacts and/or intrusion.
- 9.2 Policy EP3 of the SBDLP makes similar provision to protect the amenities of neighbouring properties and the locality in general.
- 9.3 Policy TR10 of the SBDLP states that development likely to generate HGV movements will only be permitted where it would not adversely affect the character or amenities of nearby properties or the locality in general, for example through noise, vibration, disturbance or visual intrusion in line with Policy EP3 of the SBDLP. It adds that in the case of a proposal likely to generate a significant number of heavy goods vehicle trips permission will only be granted where the access would not be onto a residential road, rural lane or other road which is not suitable in principle for such traffic, and that vehicles would be able to conveniently access the strategic highway network without using such roads.
- 9.4 Amongst other matters policy CP13 of the SBCS sets out development shall protect water quality and encourage remediation of contaminated land and seek improvements in air quality (particularly in AQMA areas).

### Noise

- 9.5 With regards to noise, in support of the application a noise assessment was carried out. The assessment identifies noise sources and their respective levels and calculates noise levels at identified noise sensitive receptors.
- 9.6 The NPPG sets out guidance for noise levels from routine mineral operations, paragraph 021 (Ref: 27-021-20140306) reads as follows:

*Mineral planning authorities should aim to establish a noise limit, through a planning condition, at the noise-sensitive property that does not exceed the background noise level (LA90,1h) by more than 10dB(A) during normal working hours (0700-1900).*

*Where it will be difficult not to exceed the background level by more than 10dB(A) without imposing unreasonable burdens on the mineral operator, the limit set should be as near that level as practicable. In any event, the total noise from the operations should not exceed 55dB(A) LAeq, 1h (free field).*

9.7 The noise levels from routine operations predicted at the receptors is below the level set by guidance.

9.8 The NPPG sets out guidance for noisy short-term mineral operations (i.e. soil-stripping, soil / bund movement), paragraph 021 (Ref: 27-021-20140306) reads as follows:

*Increased temporary daytime noise limits of up to 70dB(A) LAeq 1h (free field) for periods of up to 8 weeks in a year at specified noise-sensitive properties should be considered to facilitate essential site preparation and restoration work and construction of baffle mounds where it is clear that this will bring longer-term environmental benefits to the site or its environs.*

9.9 Again the predictions of the noise assessment identify noise levels below the above guidance level.

9.10 The assessment also acknowledges the noise impacts upon users of the footpath adjacent to the site and the cumulative impacts of infilling occurring in the northern extension area at the same time as extraction within proposed the eastern extension area. Again impacts are not predicted to exceed limits set by guidance.

9.11 The council's environmental health officer was consulted on the proposal and subject to conditions setting the hours of operation and conditioning noise levels at noise sensitive properties in line with aforementioned guidance holds no objection.

9.12 Officers consider that whilst there would be noise impacts upon the nearest noise sensitive receptors for the duration of the development, these impacts would be acceptable in line with policy and guidance subject to appropriate conditions being attached setting noise limits.

#### Air Quality / Dust

9.13 In support of the application a dust and air quality assessment was submitted. As the proposal would be subject to the same overall daily limit previously set for the quarry emissions associated with road traffic were scoped out of the assessment. The assessment identified potential dust sources, sensitive receptors and took into account meteorological data.

9.14 The assessment identified that receptors along Knighton-Way Lane are anticipated to receive the highest magnitude of effects. During soil stripping, storage and reinstatement impacts upon the receptors most effected are anticipated to be

moderate adverse. For the other operations comprised within the proposal and assessed the impacts are noted to be slight adverse. The assessment concludes that provided that the suggested dust mitigation and monitoring measures are formally adopted, there would be at most moderately adverse impacts as a result of the proposed development at all nearby receptors.

- 9.15 The council's environmental health officer was consulted upon the proposal and subject to a condition securing a dust management plan securing mitigation measures and monitoring holds no objection.
- 9.16 Officers consider that whilst there would be dust/air quality impacts upon the nearest receptors for the duration of the development. These impacts would be acceptable in line with policy and guidance subject to conditions securing appropriate mitigation measures.

#### Summary

- 9.17 Overall, whilst there would be impacts upon amenity arising from noise impacts and dust / air quality impacts, these would be temporary and not to unacceptable levels subject to operations being carried out in accordance with secured mitigation measures.

## **10.0 Landscape and visual Impact**

Policy 16: Managing Impacts upon Amenity and Natural Resources

Policy 20: Landscape Character

Policy 24: Environmental Enhancement

Policy EP3 - The Use, Design and Layout of Development

Policy EP4 - Landscaping

Core Policy 9 - Natural Environment (CP9)

- 10.1 Policy CP9 of the SBCS states that development that would harm landscape character will not be permitted, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided.
- 10.2 Policy EP3 of the SBDLP states that development will only be permitted where its scale, layout, siting, height, design, external materials and use are compatible with the character and amenities of the site itself, adjoining development and the locality in general.
- 10.3 Policy 16 of the BMWLP seeks to manage impact upon amenity and natural resources. The policy requires minerals and waste development to demonstrate the development would not give rise to unacceptable adverse impacts relating to visual impacts and/or intrusion.

- 10.4 Policy 20 of the BMWLP states that proposals for minerals and waste development should protect and enhance valued landscape in a manner commensurate with their status recognising their importance and contribution to wider networks.
- 10.5 Policy 24 of the BMWLP states proposals for new minerals and waste development must incorporate measures to enhance Buckinghamshire's environmental assets and green infrastructure networks, including the positive integration of the site with the wider landscape taking into account the Colne Valley Regional Park and other designations.
- 10.6 Policy 16 of the BMWLP seeks to ensure waste development does not give rise to unacceptable impacts including visual impacts and intrusion.
- 10.7 Policy EP4 of the SBDLP requires development to incorporate appropriate hard and soft landscaping into any proposal, take account of, and retain, existing planting and landscape features, which are or may become important elements in the character and appearance of the site and wider area, where appropriate provide for additional planting of native species and provide for the maintenance of existing and proposed planting.

#### Landscape Character

- 10.8 In terms of landscape designations, the site is not located in a protected landscape (i.e. within a National Park or Area of Outstanding Natural Beauty (AONB)). The site is located within the National Character Area (NCA) area NCA 115 Thames Valley. This NCA covers an extensive area, predominately to the western edge of greater London. The key characteristics of NC115 are as follows:
- Pockets of tranquillity within woodland and open spaces of a variety of habitats within a densely populated area.
  - Natural character of the area is overtaken by urban influences: a dense network of roads (including the M25 corridor), Heathrow Airport, railway lines, golf course, pylons, reservoirs, extensive mineral extraction and numerous flooded gravel pits
  - Area has an urban character, and there are very few villages of more traditional character, although almost half of the area is in Green Belt land
  - The area is important for recreation, both for residents and visitors.
- 10.9 In addition to the above, the South Bucks District Landscape Character Assessment (2011) identifies a series of landscape character areas (LCAs) across the South Bucks area. The site lies within LCA26.3 Colne Valley Floodplain. The key characteristics of the Colne Valley Floodplain include:
- Transport corridors cut through the landscape including the M25 and M40, which have a strong visual and audible influence. Screening earthworks are associated with these places. Two railway lines also cross the area.

- The area lies within the Colne Valley Regional Park and a well-established network of public rights of way exist with intermittent long across the Colne Valley – with these views often interrupted by roads.
  - Roads and pylons fragment an otherwise simple landscape, and generate a discordant and busy character. Away from these areas pockets of tranquillity remain associated with water and woodland.
- 10.10 Sensitivities identified for the Colne Valley Floodplain include occasional long views across lakes from Hillingdon District, hedgerow boundaries, flat landscapes accentuating the visual sensitivity of the landscape and public rights of way accesses.
- 10.11 The Colne Valley Regional Park (CVRP) have produced a landscape character document entitled Colne Valley Landscape Character Assessment (2017) (CVLCA). The site lies within ‘Denham Valley Floor’ Landscape Character Area which covers the areas between Denham Green and Uxbridge Moor Substation.
- 10.12 The Key Characteristics of ‘Denham Valley Floor’ LCA relevant to the Site are as follows:
- “Open valley floor with little topographic variation;
  - Alluvium and loamy/clayey floodplain as overlay London Clay mudstone geology;
  - Rough grazing and pasture is dominant, interspersed with arable fields and paddocks;
  - Geometric 18th and 20th century field patterns enclosed by low hedges;
  - Tree cover is limited to field boundaries and small ancient woodland;
  - Settlement comprises Denham Green (where it extends onto the floodplain), Denham village and New Denham;
  - Linear development along the major roads including A4020, A142 and A40 coupled with signage and lighting give this area an urban fringe character; and
  - Significant visual and audible disruption/fragmentation to the landscape from major infrastructure associated with M40 Junction 1, and pylons

#### LVIA

- 10.13 As highlighted previously the applicant has submitted a Landscape and Visual Impact Assessment (LVIA) which has been included as part of the ES. The landscape chapter in the ES includes an assessment of the main landscape and visual impact issues. A character assessment of the site itself was carried out as part of this assessment. The following is a summary of the conclusions of the LVIA. The term ‘significant’ is not used as this may be confused with the identification of ‘Significant’ effects under the EIA Regulations. The term Important is used where overall effects upon a receptor are identified are at a level greater than Moderate.
- 10.14 A total of seven viewpoints were selected to represent views from public viewpoints. The LVIA assessed impacts upon these along with Public Rights of Way, Public

Transport Routes and Dwellings / Private Residential Receptors. The assessment also evaluated effects upon landscape elements within the site and the character of the site and wider area.

- 10.15 The assessment has identified landscape features within the eastern area of the Site as: agricultural land, grazed grassland, native hedgerows, trees, Rusholt Brook and PROWs. During the operational phase, there would be a Medium to Low Magnitude resulting in a Moderate to Minor adverse effect upon the landscape elements that is Not Important. Following restoration and maturation of the planting, there would be Moderate beneficial effects upon the landscape elements.
- 10.16 With regards to local character areas, during the operational phase, there would be a Medium Magnitude of effect due to the extraction phase which would be undertaken in 1 phase over a period of 12-18 months, resulting in a Moderate to Minor adverse effect upon the landscape character that is Not Important. Following restoration and maturation of the planting, there would be a Moderate beneficial effect upon landscape character.
- 10.17 With regards to effects upon wider landscape, the LVIA notes for the adjacent character area of 'Colne Valley: A412 to Iver LCA' during the operational phase, there would be a Very Low Magnitude upon a Medium Sensitivity landscape resulting in a Minor effect that is Not Important. This reduces to a Neutral effect following restoration and establishment of the new planting.
- 10.18 The LVIA notes that areas from where it is predicted that the proposed development would be potentially visible are very localised due to the predominantly low-lying topography of the landform, the intervening planting, the planted screening bunds within the Site and along the site access road.
- 10.19 The site as a whole (including existing access road and processing site) would be particularly visible from along public footpath DEN/25/1 and the site access road to the north and public footpath DEN/23/1 to the east. For the extension area only, it indicates that the greatest theoretical visibility would be limited to the immediate vicinity of the eastern area, including beyond the northern boundary (public footpath DEN/25/1) and beyond the eastern boundary (public footpath DEN/23/1).
- 10.20 For users of the public footpaths, those using DEN/25/1 immediately north of the eastern area and DEN/23/1 to the east of the site would experience temporary, short-term, partially mitigated Moderate adverse effects during the operational phase that would be a Not Important effect. This effect is due to the partially mitigated views being experienced in close proximity when walking along footpath DEN/25/1. The other public footpaths further afield and the stretch of Denham Road/A412 which the ZTV identifies as having potential views of the Site, would experience temporary, Minor adverse to Neutral effects that are Not Important upon the visual amenity during the operational phase. Following restoration, the visual effects experienced from the public footpaths would be generally range from Moderate beneficial to Neutral effects. The Moderate beneficial effects relate to

users of the public footpaths that are in close proximity to the Proposed Development.

- 10.21 Direct, close range views are experienced from the residential properties along Knighton-way Lane (DEN/23/1). Close range, partly oblique and partly filtered views are experienced from the residential properties on the western extent of Newtown Road. Close range, direct to partly oblique and filtered views are experienced from Brickfield Farm and Field Cottage. The residents of the properties on Knighton-way Lane (DEN/23/1) overlooking the Site would experience temporary, short-term, partially mitigated, Major to Moderate adverse effects during the operational phase, taking into account the screening bunds to minimise effects upon visual amenity. For other properties within close range of the Proposed Development, residents would experience Moderate adverse effects while Southlands Manor would experience Neutral effects. Beyond the 250m close range distance, residents of properties identified as having visibility of the proposal would experience temporary, short-term, Moderate adverse to Neutral effects. Residents of the properties within close proximity of the Proposed Development would experience Moderate beneficial effects following restoration. The residents of the properties further afield would experience Minor beneficial to Neutral effects following restoration.
- 10.22 The potential cumulative effect upon landscape character would be a Moderate to Minor adverse overall effect that is Not Important. This takes into account the extended combined presence of the excavation and movement of vehicles within the Site and the New Denham Northern Extension quarry. Following restoration and establishment of planting, there would be a Low beneficial effect upon landscape character.
- 10.23 There is potential for cumulative visual effects of the Proposed Development and the existing operational quarries from publicly accessible locations due to the scale and extent of the operations. The Magnitude of cumulative effects would be Medium adverse resulting in overall effect of Moderate which is Not Important. Following restoration and maturation of planting, there would be a Moderate beneficial effect upon visual amenity.
- 10.24 In summary, the LVIA assessed that the Proposed Development could be accommodated in the landscape with relatively modest and localised adverse landscape and visual effects during the operational phase. Mitigation measures such as the proposed bunding would minimise the impact upon landscape character, individual landscape elements and upon visual amenity.
- 10.25 The council's landscape advisor was consulted on the proposal and did not contest the findings of the LVIA. The officer advised that conditions securing detailed landscape planting schemes, boundary treatments and maintenance were necessary.
- 10.26 Officers concur with the above assessment and consider that whilst there would be temporary impacts upon landscape, the permanent restoration of the site would be in keeping with the locality. Overall, it is considered that the proposal is in



accordance with the requirements of policies 16, 20 and 24 of the BMWLP, policies EP3 and EP4 of the SBDLP and policy CP9 of the SBCS.

## 11.0 Ecology

CP9 Natural Environment

Policy 18: Natural Environment

Policy 24: Environmental Enhancement

- 11.1 Policy 18 of the BMWLP seeks to conserve and enhance natural assets and resources, including protected and notable species. A hierarchy of designated sites and level of protection afforded to them is contained within Policy 18. Undesignated natural environment assets should be conserved and enhanced with proposals causing harm only being granted where these impacts can be reduced to an acceptable level. The policy also states development should provide net gains in biodiversity and proposals should include an assessment of the natural environment assets.
- 11.2 Policy 24 of the BMWLP states proposals for new minerals and waste development must incorporate measures to enhance Buckinghamshire's environmental assets and green infrastructure networks, including: opportunities for biodiversity net gain.
- 11.3 Policy CP9 of the SBCS states that the landscape characteristics and biodiversity resources within the area will be conserved by: not permitting development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided. The policy also seeks conservation and net gain in biodiversity resources, maintaining existing ecological corridors, conserving and enhancing landscapes and improving the rural-urban fringe by supporting initiatives in the Colne Valley Park Action Plan.
- 11.4 The application is supported by an Ecological Assessment which includes a Biodiversity Net Gain assessment. The assessment identifies the site is located within the Colne Valley Biodiversity Opportunity Area. The extension area is made up of grazed pasture with hedgerows, trees and some unmanaged grassland. The Rusholt Brook runs through the site to the west but outside of the proposed extraction area.
- 11.5 The assessment also examined the potential for impacts upon protected species, flora and fauna.
- 11.6 The proposed restoration is estimated to result in a 76.71% increase in habitat units and 109.43% for hedgerows which naturally exceeds the 10% net gain that is sought after.
- 11.7 Natural England were consulted on the proposal and considers that the proposed development will not have significant adverse impacts on statutory designated sites (*Kingcup Meadows and Oldhouse Wood SSSI*). They thus have no objection.

- 11.8 The council's ecologist was consulted upon the proposal and considered that the proposals are considered unlikely to result in any significant adverse ecological impacts, and that the restoration proposals will enhance the ecological value of the site in this strategically significant area.
- 11.9 The ecologist advised that they hold no objection subject to consultation of the council's newt officer, the inclusion of a planning condition requiring an ecological management plan.
- 11.10 The council's newt officer was consulted upon the proposal and noted that as the site has poor connectivity to suitable ponds they are satisfied that if the proposal is approved it would be unlikely to cause an impact on great crested newts or their habitat. The officer recommends an informative.
- 11.11 Overall, it is considered that the proposal conserves and enhances the natural environment in accordance with above referenced policy also delivering a sizeable biodiversity net gain.

## **12.0 Green networks and infrastructure**

Policy 24: Environmental Enhancement

CP5 Open Space, Sport and Recreation

CP6 Local Infrastructure Needs

- 12.1 Policy 24 of the BMWLP states proposals for new minerals and waste development must incorporate measures to enhance Buckinghamshire's environmental assets and green infrastructure networks, including (where appropriate) achieving consistency with the Buckinghamshire Green Infrastructure Strategy. The policy also seeks the retention of existing ROW or where this is not possible their diversion or replacement to an equal or greater standard in terms of recreational, social and economic value to site users and local communities, including linking with wider transport and strategic rights of way networks. In addition, consideration should be given to the opportunity for providing new routes, taking into account the potential value to site users and to local communities. Proposals will be required to be consistent with the Buckinghamshire Rights of Way Improvement Plan.
- 12.2 Policy CP6 of the SBCS states that existing physical, social and Green Infrastructure will be protected (unless it is clear that it is no longer needed, or alternative appropriate provision is made elsewhere).
- 12.3 The proposal would not require the diversion or closure of any public rights of way.
- 12.4 The council's Rights of Way Team were consulted and note that the extension would prolong the inconvenience pedestrians experience negotiating the gates along DEN/25/1 but recognise this is relatively small.

- 12.5 There is a wider strategy of public access across New Denham Quarry with bridleway, footpath and permissive paths to be delivered across the site. Whilst the proposal does not add to this provision it is considered that it protects the existing infrastructure and meets above policy objectives.

### **13.0 Colne Valley Regional Park**

Policy 18: Natural Environment

Policy 24: Environmental Enhancement

Policy 25: Delivering High Quality Restoration and Aftercare

CP9 Natural Environment

- 13.1 The CVRP is guided by six objectives pertaining to: landscape, countryside, biodiversity, recreation, rural economy and community participation.
- 13.2 The CVRP was established in 1965 by a number of Local Authorities including predecessors of Buckinghamshire Council to enhance and protect this area of Green Belt.
- 13.3 Policy 18 of the BMWLP states development should provide net gains in biodiversity and enhance strategic ecological networks, particularly within the Colne Valley Regional Park.
- 13.4 Policy 24 of the BMWLP states proposals for new minerals and waste development must incorporate measures to enhance Buckinghamshire's environmental assets and green infrastructure networks, including: the positive integration of the site with the wider landscape taking into account the Colne Valley Regional Park and other designations.
- 13.5 Policy 25 of the BMWLP states restoration of a site must, when within the Colne Valley Regional Park, seek to enhance the characteristics and qualities for which the area was designated giving consideration to the provision of green infrastructure and opportunities for access and recreation.
- 13.6 Policy CP9 of the SBCS states that landscape characteristics and biodiversity resources will be conserved and enhanced by, among other things, improving the rural/urban fringe by supporting and implementing initiatives in the Colne Valley Park Action Plan.
- 13.7 It is considered the restoration scheme would be fully in accordance with the objectives and aims of the Colne Valley Regional Park. There would be temporary harm to the Colne Valley Regional Park through the disturbance generated from carrying out of the proposal.
- 13.8 Overall, it is considered appropriate consideration has been given to the provision of green infrastructure, enhancement of biodiversity and ecological networks and the proposals would integrate well into the Colne Valley Regional Park.

## 14.0 Flooding and drainage

CP13 - Environmental and Resource Management

Policy 16: Managing Impacts on Amenity and Natural Resources

- 14.1 Policy CP 13 of the SBCS dictates that vulnerable development should be directed away from areas at risk of flooding wherever possible and that all new development should incorporate Sustainable Drainage Systems (SuDs) where feasible.
- 14.2 Policy 16 of the BMWLP, amongst other things, seeks to secure that development will not give rise to unacceptable impacts on a number of matters including quality and quantity of water resources, Source Protection Zones and flood risk.
- 14.3 Paragraph 162 of the NPPF states that the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. It states that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.
- 14.4 Paragraph 167 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The paragraph adds that development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) and with a number of requirements met including:
- within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
  - the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
  - it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
  - any residual risk can be safely managed.
- 14.5 The Chiltern and South Bucks District Council SFRA identifies the site to be within Flood Zone 1.
- 14.6 The application is supported by a Water Environment Impact Appraisal which includes a Flood Risk Assessment. The document identifies the entirety of the site falls within Flood Zone 1 for fluvial flooding. With regards to surface water there is noted to be a small up-gradient catchment but the site is not situated along any major potential surface flow pathways. The document also assesses the risk from flood defence breach, groundwater, artificial drainage systems and infrastructure failure but does not identify risks for these.

- 14.7 The development would incorporate sustainable drainage systems, is flood resistant in nature and the most vulnerable development is located away from areas of flood risk.
- 14.8 With regards to the restoration landform, the FRA identifies that the landform will fall towards the proposed area of open water. Given the permeable nature of the restoration soils (i.e. the natural soils that are currently on site) runoff will be minimal with runoff draining towards the lake. This open water will be in continuity with groundwater. Given the high permeability of the underlying gravels the lake does not and will not require a surface outfall. All storm runoff will infiltrate to ground and there is no potential for increased surface runoff from the site. The assessment finds the proposal would not be subject to undue levels of flood risk and will not result in any short or long-term adverse impacts on flooding locally.
- 14.9 Following the completion of the Flood Risk Assessment (FRA) it has transpired that mapping from the Environment Agency has been updated. The site is now identified to be partially within flood zone for the maximum extent of flooding from reservoirs when there is also flooding from rivers. At the time of writing, the applicant is preparing an update to the assessment to address this matter. Officers will update on this at the committee meeting.

#### Sequential Test

- 14.10 Part of the site has already been sequentially tested as part of the allocations within the Buckinghamshire Minerals and Waste Local Plan. However, there is a portion of the site lying outside the allocation. Due to the surface water risks and the situation of the site within the reservoir flood zone (when rivers flood also) it is considered appropriate to apply the sequential test.
- 14.11 The purpose of the sequential test, as explained by Paragraph 162 of the NPPF, is to steer new development to areas of lowest flood risk. These mean that *“development should not be allocated or permitted approved if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding”*.
- 14.12 It is therefore appropriate to consider whether there are reasonably available sites appropriate for mineral extraction of sand and gravel at lower risk of flooding.
- 14.13 It should also be recognised, as set out in the PPG, that mineral deposits have to be worked where they are found and thus there is little scope for relocation (and sand and gravel extraction is defined as ‘water-compatible development’ in National Planning Policy Framework Annex 3, acknowledging that these deposits are often in flood risk areas).
- 14.14 In this case as described above, the majority of the site has been allocated for extraction and therefore would not need to be subject to a sequential test. The area which is outside of the allocation however does warrant application of the test. In terms of whether there are any other appropriate sites there are multiple sites allocated for mineral extraction within the county with many potential unallocated

sites. Thus, there would likely be sites of comparable or slightly lower flood risk. However, in this case there is no alternative site as the matter relates to extraction beyond an allocated boundary utilising an existing plant / processing area rather than a new site entirely. As stated previously it is prudent to ensure that as much resource as possible is extracted from and associated with allocations ensuring that mineral underlying this area is not rendered impractical / unfeasible to extract in the future.

- 14.15 It is therefore considered that as there are no other appropriate sites the application passes the sequential test.
- 14.16 The exception test does not apply as sand and gravel working is classified as 'water compatible' development in Annex 3 to the NPPF. NPPG Table 2 (Paragraph: 079 Reference ID: 7-079-20220825) confirms that the exception test referred to by paragraph 163 of the NPPF is therefore not required.

#### Summary

- 14.17 The Lead Local Flood Authority were consulted on the proposal and has no objection subject to the proposal being carried out in accordance with the submitted Flood Risk Assessment.
- 14.18 The Environment Agency were consulted on the proposal and have no objection to the proposal provided the development proceeds in accordance with the submitted details.
- 14.19 Subject to an updated flood risk assessment evidencing that the site would be safe in the event of flood and does not increase flood risk elsewhere, it is considered that the proposal would not result in unacceptable flood risks and utilises sustainable drainage systems in accordance with policy detailed above.

## **15.0 Historic Environment**

### CP8 Built and Historic Environment

#### Policy 19: Historic Environment

- 15.1 Policy 19 of the BMWLP requires proposals to conserve heritage assets in a manner appropriate to their significance.
- 15.2 Policy CP8 of the SBCS makes similar provision and sets out that the protection of the area's historic environment is of paramount importance. This policy is not entirely consistent with the language of the NPPF set out in paragraphs 199 and 202 as they apply in this instance, how this harm should be quantified, and the balancing of harm against public benefits, and can only be afforded limited weight.
- 15.3 No designated heritage assets are located within the site.
- 15.4 The nearest listed historical assets are Southlands Manor and its barn which lie approximately 170m to the west of the site boundary (processing area) and are both Grade 2 listed buildings.

- 15.5 Paragraph 195 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by the proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 15.6 Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The same paragraph states that this great weight should be applied irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 15.7 Paragraph 202 of the NPPF goes on to state that "where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".
- 15.8 Paragraph 205 of the NPPF states "Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."
- 15.9 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision makers in considering whether to grant planning permission for development which affects a listed building, or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 15.10 The application is supported by a Heritage Statement.
- 15.11 Historic England were consulted upon the application and noted that they did not need to be consulted for the application, making no comment.

#### Built Heritage

- 15.12 The council's heritage officer was consulted on the proposal and noted that whilst there are a number of listed buildings around the periphery of the extended site, it would not have an impact on these designated heritage assets. They therefore hold no objection to the proposals.

#### Archaeology

- 15.13 The council's archaeology team was consulted on the proposal and reviewed the heritage statement. The council's archaeologist concluded that the application site includes or has the potential to include heritage assets of archaeological interest of

potentially national significance. The archaeologist concurs with the recommendation of the Heritage Statement that a geoarchaeological deposit model is produced and that areas of high potential are defined by detailed test pitting. The information from this should enable potentially nationally significant archaeological assets to be preserved in situ.

- 15.14 The council's archaeologist holds no objection to the proposal, notes that if planning permission is granted that it is likely to harm a heritage asset's significance but recommends that a condition is secured to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 205.
- 15.15 The harm to this as a non-designated heritage asset (not of equivalent significance to a scheduled monument), will be considered in the planning balance.

#### Summary

- 15.16 It is considered that the proposal would not result in any impacts upon built heritage and listed assets proximal to the site. It is considered that the proposal conserves these in a manner appropriate to their significance in accordance with policy 19 of the BMWLP and CP8 of the SBCS.
- 15.17 The proposal would result in some harm to archaeology which will be weighed in the planning balance of this report in accordance with paragraph 203 of the NPPF.

## **16.0 Aerodrome Safeguarding**

Policy EP17 – Aerodrome / Air Traffic Safeguarding

Policy 23: Design and Climate Change

- 16.1 Policy EP17 of the SBDLP states the council will not permit development which would interfere with the safe operation of an aerodrome or with the movement of air traffic over the District.
- 16.2 Policy 23 of the BMWLP also requires minerals and waste development incorporates safety measures and takes into account aviation safety.
- 16.3 The local planning authority are also required to follow the protocol set out in the Planning Circular 01/03: Safeguarding Aerodromes.
- 16.4 London Heathrow was consulted on the proposal and, subject to the existing Bird Hazard Management Plan being carried over to the extension area, and the planting of tall emergent vegetation in the lake, hold no safeguarding concerns.
- 16.5 The Ministry of Defence (RAF Northolt) was consulted on the proposal and request a condition securing a Bird Hazard Management Plan for the extension area. Subject to this being secured they hold no objection to the proposal.
- 16.6 Denham Aerodrome was consulted on the proposal but did not return comments.



- 16.7 Subject to the implementation of a Bird Hazard Management Plan it is considered the proposal would take into account aviation safety appropriately and meet abovementioned policy.

## **17.0 Climate Change**

Policy 23: Design and Climate Change

Policy 25: Delivering High Quality Restoration and Aftercare

- 17.1 With regards to climate change policy 23 of the BMWLP sets out that minerals development should secure high quality design and minimise adverse impacts on and from climate change.
- 17.2 Policy 25 of the BMWLP states that restoration schemes should provide for climate change mitigation and adaptation.
- 17.3 With regards to minimising greenhouse gas emissions the applicant states measures to be employed on site include: turning off plant and equipment when not in use; using modern plant and equipment which is more energy efficient and utilising their Euro 6 lorries.
- 17.4 With regards to the restoration scheme, the planting provided would provide some carbon sequestration benefits. The scheme's flood risk allowing for impacts of climate change has also been assessed.
- 17.5 Overall, subject to conditions / obligations securing the above the proposal meets above policy. With regards to securing EURO 6 compliant vehicles, the obligation would relate only to vehicles within the applicant's control.

## **18.0 Raising the quality of place making and design**

Policy EP3 – The Use, Design and Layout of Development

CP8 – Built and Historic Environment

Policy 23: Design and Climate Change

- 18.1 Policy 23 of the BMWLP states that minerals development should secure high quality design and minimise adverse effects on and from climate change and to this end should reflect the character of the surrounding environment, incorporate safety and security measures, incorporate the principles of sustainable design and construction, apply SUDS, minimise greenhouse gas emissions including proofing for climate change and utilise appropriate native species in planting schemes. The policy recognises that minerals development may have a reduced capacity to address some of the above criteria however they should be addressed to the fullest extent possible.

- 18.2 Great weight will be given to outstanding or innovative designs which help raise the standard of design for mineral development.
- 18.3 Policy EP3 of the SBDLP states that development will only be permitted where its scale, layout, siting, height, design, external materials and use are compatible with the character and amenities of the site itself, adjoining development and the locality in general. Poor designs which are out of scale or character with their surroundings will not be permitted. The policy states that the layout should not be dominated by large areas set aside for parking, servicing or access, and where extensive space is required for such activities, it should be subdivided by landscaping. It further states that the layout of new development should, where possible, create attractive groupings of buildings and spaces between buildings.
- 18.4 SBCS Policy 8 states that all new development must be of a high standard of design and make a positive contribution to the character of the surrounding area. It states that new development should be designed to help tackle the causes of, and be resilient to the effects of, climate change.
- 18.5 As has been set out in the above sections whilst the proposed development will result in impacts these can be minimised via adherence to planning conditions and best practice. The restoration of the site would be positive for the natural environment and the concept is in line with above policy.
- 18.6 It is considered the proposal meets the above listed policies.

## 19.0 Other Matters

### Policy 16: Managing Impacts on Amenity and Natural Resources

#### Subsidence

- 19.1 Some comments upon the application raise concerns over potential risks of subsidence to nearby properties. Policy 16 of the BMWLP sets out subsidence should be addressed in submissions.
- 19.2 In support of the application the applicant provided a slope stability & settlement study which examined the potential for settlement to impact properties along Knighton-way Lane. The study found that it is highly unlikely that the proposed development will pose any threat to properties and or other third-party assets.

#### Silicosis

- 19.3 Some comments upon the application raise concerns over potential risks of silicosis. The Health and Safety Executive note that workers exposed to fine dust containing quartz are at risk of developing a chronic and possibly severely disabling lung disease known as "silicosis". No cases of silicosis have been documented among members of the general public in Great Britain, indicating that environmental exposures to silica dust are not sufficiently high to cause this occupational disease.

### Composite Restoration Plan

- 19.4 Per the recommendation, an updated composite restoration plan is required prior to determination. The composite restoration plan would show how the restoration of the proposed extension area would interact with the previously approved / restored areas.

## **20.0 Weighing and balancing of issues / Overall Assessment**

- 20.1 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:
- a. Provision of the development plan insofar as they are material,
  - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
  - c. Any other material considerations
- 20.2 As set out above it is considered that the proposed development would accord with policies of the development plan and no material considerations dictate a decision should be made other than in accordance with the development plan.
- 20.3 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

## **21.0 Working with the applicant / agent**

- 21.1 In accordance with paragraph 38 of the NPPF (2021) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 21.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 21.3 In this instance the applicant / agent:
- the applicant/agent was updated of any issues after the initial site visit,
  - The applicant was provided the opportunity to submit amendments to the scheme/address issues.

- The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

## **22.0 Recommendation**

22.1 Subject to the submission of an updated composite restoration scheme drawing for New Denham Quarry it is recommended that the application ref: CM/0003/23 is APPROVED subject to the imposition of planning conditions broadly in accordance with the details set out in this report, suitable planning obligations securing use of EURO 6 compliant vehicles and the implementation of a Bird Hazard Management Plan.

### **Conditions:**

#### **General**

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 Local Planning Authority.

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

2. The development hereby permitted shall not be carried out otherwise than in complete accordance with the following drawings and supporting details and documents:

- Location Plan, Drawing Number; M12.162(n).D.001A Rev A dated 5<sup>th</sup> October 2022
- Sections, Drawing Number: M12/162(n).D.011 dated December 2022
- Extraction of the Processing Plant Area, Drawing Number: M12.162(n).D.012 Rev A dated 25<sup>th</sup> July 2023
- Extraction Design, Drawing Number: M12.162(n).D.002 Rev D dated 8<sup>th</sup> August 2023
- Extraction Design, Inset showing footpath location, Drawing Number: M12.162(n).D.016 dated August 2023
- Restoration, Drawing number; M12.162(n).D.003 Rev H dated 8<sup>th</sup> August 2023

- Site Plan of Proposed New Plant, Drawing Number: DEN/500 Rev B dated 24<sup>th</sup> January 2006
- Elevations of Proposed New Plant, Drawing Number: DEN/501 Rev A dated June 2003
- Proposed Ready Mix Concrete Plant, Drawing Number: 2513/01 Rev A dated June 2008
- Proposed Ready Mix Plant Overlay (Proposed on Consented), Drawing Number: 2513/02 Rev B dated June 2008
- Details of Outbuildings – Weighbridge Office, Drawing Number: SB/150/1
- Details of Outbuildings – Canteen, Drawing Number: SB/150/2
- Details of Outbuildings – Workshop, Drawing Number: SB/150/3
- Agreed Layout of 4-arm roundabout on A412, Drawing Number: 1250/12

Reason: To define the development permitted and to control the operations in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

#### **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 identified as 'Eastern Extension' upon Drawing No: M12.162(n).D.001A (Rev A, dated August 2021) no later than 24 months after the date of commencement.

Reason: To control the period of operations within the timescale which has been judged by the Local Planning Authority to be acceptable in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

4. 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 48 months after the date of commencement.

Reason: To control the period of operations within the timescale which has been judged by the Local Planning Authority to be acceptable in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

#### **Decision Notice for Inspection**

5. 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 Local 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 in accordance with policies 16 and 25 of the Buckinghamshire Minerals and Waste Local Plan.

### **Working Programme**

6. For the duration of the development, the operator shall 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, as recorded by the Automatic Traffic Count System installed on the access road approved pursuant to condition 8 attached to planning consent no. SBD/8201/06 by letter dated 14<sup>th</sup> April 2008. The Automatic Traffic Count System shall be maintained in accordance with the approved details for the duration of the development. The records kept pursuant to the approved scheme shall then be made available to the Local 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 in accordance with policies 16 and 17 of the Buckinghamshire Minerals and Waste Local Plan.

7. There shall be no dewatering of the site.

Reason: To define the development permitted and to control the operations in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

8. No mineral processing plant or buildings shall be located other than in the 'Existing Denham Quarry Plant Site shown on Drawing No: M12.162(n).D.001A (Rev A, dated August 2021.

Reason: To ensure that mineral processing and stockpiling is not carried out other than in the designated areas, in the interest of local amenity in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

### **Restriction of Permitted Development Rights**

9. Notwithstanding the provisions of the Town and County Planning (General Permitted Development) Order 2015 (as amended) 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 Local 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 and in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

### **Hours of Operation**

10. No operations authorised by this consent shall be carried out other than between the following hours:
- 7:00 am to 6:00 pm Mondays to Fridays
  - 7:00 am to 1:00 pm Saturdays
  - 1:00 pm to 6:00 pm Saturdays for maintenance only

No operations, other than for essential maintenance, shall be carried out on Sundays or Public Holidays.

Notwithstanding the above, within the area identified as 'Eastern Extension' upon Drawing No: M12.162(n).D.001A (Rev A, dated August 2021) no operations shall be carried out other than between the following hours:

0800 to 1800 Monday to Friday

No operations other than for essential maintenance on Saturdays, Sundays or on Public Holidays

Reason: In the interests of local amenity in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

### **Access and Vehicles**

11. Prior to commencement of the development a scheme for parking, manoeuvring and the loading and unloading of vehicles shall be submitted for approval by the Local Planning Authority, for written approval. The approved scheme shall thereafter be implemented and made available for use before the development hereby permitted is occupied and that the area to be used for parking, manoeuvring and the loading and unloading of vehicles shall not be used for any other purpose.

Reason: This pre commencement condition is required to enable vehicles to draw off, park, load/unload and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway.

12. In combination with planning consent refs: SBD/8201/06, 11/01460/CM, CM/23/16 and CM/32/14 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 in accordance with policy 17 of the Buckinghamshire Minerals and Waste Local Plan.

13. The vehicle wheel and body cleaning facilities submitted pursuant to condition 27 attached to planning consent no. SBD/8201/06 and approved in writing by letter dated 14th April 2008 shall 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 in accordance with policies 16 and 17 of the Buckinghamshire Minerals and Waste Local Plan.

14. 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 potholes, 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 in accordance with policies 16 and 17 of the Buckinghamshire Minerals and Waste Local Plan.

15. No loaded heavy goods vehicle shall exit the site without being securely sheeted or otherwise covered.

Reason: In the interests of highway safety and the amenities of the local area in accordance with policies 16 and 17 of the Buckinghamshire Minerals and Waste Local Plan.

16. Vehicles using the access road to and from the site and internal haul roads shall not travel at more than 5 mph on unpaved ground and 10 mph on paved ground land signs shall be erected within the site to notify drivers.

Reason: To minimise danger to other users and particularly to users of footpath number 25, and to minimise dust created in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

### **Water Environment**

17. The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (ref. 401.00063.00071, July 2022, SLR).

Reason: To prevent flooding by ensuring the satisfactory disposal and storage of surface water from the site and to ensure that surface water is managed in a sustainable manner, in accordance with Paragraph 167 of the National Planning Policy Framework and policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

### **Lighting**

18. No additional illumination shall be erected or otherwise provided on the site without the prior written approval of the Local planning Authority.

Reason: To ensure that there is no problem of light spill beyond the boundaries of the site in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

## **Archaeology**

19. No development shall commence until a written scheme of investigation for a staged programme of archaeological mitigation has been approved by the planning authority. These mitigation works will include:

1. The production of a geological deposit model to further define areas of archaeological potential.
2. A staged programme of test-pitting to confirm the nature, location, extent and significance of any lithic scatters.
3. Appropriate mitigation measures in the form of preservation in situ, or archaeological excavation.

Where significant archaeological remains are confirmed and warrant preservation in situ, no development shall take place within these areas until an appropriate methodology for their preservation in situ which has been approved by the planning authority.

Where archaeological remains are recorded and are not of sufficient significance to warrant preservation in situ but are worthy of recording no development shall take place within these areas until a programme of archaeological work has been completed in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority.

Reason In the interest of the Historic Environment in accordance with policy 19 of the Buckinghamshire Minerals and Waste Local Plan.

## **Arboriculture**

20. Prior to the commencement of the development hereby permitted, a site specific Arboriculture Method Statement (AMS) taking into account guidance within British Standard 5837 :2012 to cover all aspects of tree protection/retention (including root protection areas and fencing) and a detailed tree protection plan shall be submitted to and approved in writing by the Local Planning Authority. The development hereby permitted shall thereafter be carried out in accordance with the approved Arboriculture Method Statement.

Reason: This pre commencement condition is required to maintain the amenity of the area and ensure retained trees, shrubs and hedges are not damaged during all phases of development to avoid any irreversible damage to retained trees pursuant to section 197 of the Town and Country Planning Act 1990 by ensuring the development accords with method statement and that the correct materials

and techniques are employed which conform to current British Standard 5837 specification guidance. Also, to accord with policy 18 of the Buckinghamshire Minerals and Waste Local Plan.

## **Ecology**

21. Prior to commencement of site clearance, including ground works and vegetation removal an Ecological Management Plan (EMP) shall be submitted to and approved in writing by the local planning authority. The content of the EMP shall include the following:

- a) Identification of ecological features to be protected, as per those identified in the approved Ecological Appraisal, Ward Associates, December 2022.
- b) An ecological constraints plan that shall illustrate the 10 m stand-off zone from Rusholt Brook and location of any protective fencing being used to protect ecological features, for example retained trees and habitat.
- c) Method statements for the protection of all relevant ecological features including but not limited to reptiles, birds and badgers.
- d) Aims and objectives of management which will (without limitation) include the provision of biodiversity net gain within the Site as calculated by the Biodiversity Metric submitted pursuant to the application (Habitat Units 76.71%, Hedgerow Units 109.43%).
- e) Appropriate management options for achieving aims and objectives.
- f) Prescriptions for management actions.
- g) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- h) Details of the body or organisation responsible for implementation of the plan.
- i) Ongoing monitoring and remedial measures. This shall include site visits on a regular basis (as appropriate) to ensure protection measures are proving effective. The site visits shall also include surveys to monitor badger activity at the site.

The plan shall be for no less than the duration of works and subsequent aftercare period. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the EMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: This pre commencement condition is required to ensure appropriate protection and enhancement of biodiversity, to make appropriate provision for natural habitat within the approved development and to provide a reliable process

for implementation and aftercare. To ensure legislative compliance with Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Protection of Badgers Act 1992 and to meet the requirements of Buckinghamshire Minerals and Waste Local Plan policy 18.

### **Soil Handling**

22. Prior to commencement of the development hereby permitted a scheme for stripping, handling and storage of soils shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall detail tests for ascertaining that ground and soil conditions are suitable for soil handling. The development shall be carried out in accordance with the approved details

Reason: This pre commencement condition is required 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 and in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

23. No topsoil or subsoil shall be removed from the site.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

24. At least three working days notice shall be given to the Local planning Authority of the planned commencement soil movement operations including soil stripping, re-grading or spreading of topsoil or subsoils (or subsoil substitute material). Soil movement operations shall not be carried out if the Local 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 in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

25. 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 in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

26. All stored topsoil, subsoil over or underburden (soil substitute material) mounds shall be constructed with the minimum of 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 in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

27. No storage mounds shall be traversed by heavy vehicles or machinery except where essential 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 in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

28. Stockpiles of processed or unprocessed mineral within the site shall not exceed 8 metres in height.

Stockpiles of processed or unprocessed mineral within the area identified as 'Eastern Extension' upon Drawing No: M12.162(n).D.001A (Rev A, dated August 2021) shall not exceed 5m in height above existing ground level.

Reason: In the interests of local amenity and flood protection in accordance with policies 16 and 20 of the Buckinghamshire Minerals and Waste Local Plan.

29. Soil storage bunds within the site shall not exceed 5 metres in height.

Soil storage bunds created in association with the extraction of sand and gravel from within the area identified as 'Eastern Extension' upon Drawing No: M12.162(n).D.001A (Rev A, dated August 2021) shall not exceed three metres in height.

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

accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan. To protect the amenities of the local area in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan

30. The topsoil, subsoil and subsoil substitute material storage mounds once constructed shall not be subsequently disturbed until required for restoration purposes.

Reason: To ensure by the careful handling and storage of soil resources the satisfactory restoration of the site to agriculture and woodland uses and in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

### **Pollution Prevention and Control**

31. a) Except for the temporary operations outlined in b), 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 including: Properties on Knighton-way Lane, Brickfield Cottage, Southlands Manor, Southlands Manor Lodge and Field Cottage.

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 (in accordance with National Planning Policy Paragraph: 021 Reference ID: 27-021-20140306) 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 Local planning Authority.

Reason: To protect the occupants of nearby residential premises from loss of amenity from noise disturbance in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

32. No development shall commence until a noise management plan has been submitted to the Minerals Planning Authority and approved in writing. This plan shall include details of:

- A programme of noise monitoring including provisions for the submission of noise monitoring data to the Minerals Planning Authority for inspection;
- mitigation measures

The approved plan shall be implemented in full.

Reason: To protect the occupants of nearby residential premises from loss of amenity from noise disturbance in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

33. No reversing beepers or other means of audible warning of reversing vehicles shall be fixed to, or used on, any vehicle operating on the site, other than those which use white noise.

Reason: To protect the occupants of nearby residential premises from loss of amenity from noise disturbance in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

34. No waste shall be imported to and deposited within the area identified as 'Eastern Extension' upon Drawing No: M12.162(n).D.001A (Rev A, dated August 2021).

Reason: The importation of waste materials would raise environmental and amenity issues which would require consideration afresh and in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

35. 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 Local planning Authority.

Reason: To ensure that groundwater and surface water bodies are not polluted in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

36. Prior to commencement of the development hereby permitted, a detailed scheme for the monitoring and mitigation of dust shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented thereafter for the duration of the development.

The detailed Dust Management Plan shall be reviewed and where appropriate modified when requested by the Mineral Planning Authority following a justified complaint. Any amended Dust Management Plan shall be submitted to the Mineral Planning Authority for approval in writing and any amended detailed Dust Management Plan which is approved shall be fully implemented.

Reason: This pre commencement condition is required to ensure air quality impacts from the proposal would not be unacceptable and in the interests of local amenity in accordance with policy 16 of the Buckinghamshire Minerals and Waste Local Plan.

### **Liaison Meeting**

37. No development shall commence until a scheme that sets out measures for liaison arrangements with the local community has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved scheme shall be implemented for the duration of the development hereby approved.

Reason: The condition is pre-commencement to enable representatives of the local community to have direct regular contact with the operator and council officers in accordance with policy 28 of the Buckinghamshire Minerals and Waste Local Plan.

### **Restoration and Aftercare**

38. Prior to the commencement of development, a detailed landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall be based upon Drawing Number: M12.162(n).D.003G, Restoration, (Rev G, dated 3rd May 2023), and shall include the following details:
- 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 shall 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 approved scheme shall then be implemented as required throughout the duration of the development.

Reason: This pre commencement condition is required to ensure satisfactory restoration of the site in accordance with policy 25 of the Buckinghamshire Minerals and Waste Local Plan.

39. Within 6 months of the commencement of the scheme, a detailed Aftercare Scheme for a period of five years to provide for amenity and nature conservation after uses shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include the annual aftercare programme to be carried out and provide for:

- a) The removal of any large stones from the surface;
- b) The making up of any low spots with topsoil;
- c) Management objectives for landuse / habitat / species
- d) Ground maintenance including weed control
- e) Water Management Operations
- f) An analysis of the soil acidity and nutrient deficiency;
- g) An annual site meeting which will be attended by representatives of the developer, and the Local Planning Authority.
- h) A detailed annual programme, including further details of the type, depth and spacing of drains, ditches and outfalls as may be required and measures to maintain and repair the drainage system and measures to maintain the hedgerows, trees and fences, and replace any dead or diseased trees or shrubs as may be required to be submitted to the Local

Planning Authority not later than two months prior to the annual Aftercare meeting.

The approved scheme shall be implemented thereafter.

Reason: To ensure the satisfactory restoration of the site in accordance with policy 25 of the Minerals and Waste Local Plan.

**Informatives:**

The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: deliberately capture, disturb, injure or kill great crested newts; damage or destroy a breeding or resting place; deliberately obstructing access to a resting or sheltering place. Planning consent for a development does not provide a defence against prosecution under these acts. Ponds, other water bodies and vegetation, such as grassland, scrub and woodland, and also brownfield sites, may support great crested newts. Where proposed activities might result in one or more of the above offences, it is possible to apply for a derogation licence from Natural England or opt into Buckinghamshire Council's District Licence. If a great crested newt is encountered during works, all works must cease until advice has been sought from Natural England, as failure to do so could result in prosecutable offences being committed.

## **APPENDIX A: Consultation Responses and Representations**

### Councillor Comments

**CLlr Guy Hollis** – This application has caused much consternation amongst residents who feel that the operation is too close to the border of the curtilage due to the allegation that noise and dust levels have been measured as mitigated from the side elevation of neighbouring properties and not the boundary of their gardens.

In addition, there is widespread knowledge of how, in the case of the site of green belt restoration in Hollybush Lane, the monitoring recommended by the Strategic Sites Committee appears to have not been done very often and that this council's lack of resource to do so is a material risk to the wellbeing of neighbouring residents. This should be a material planning consideration albeit somewhat vicarious.

**CLlr Santokh Chhokar** – No comment received.

**CLlr Paul Bass** – No comment received.

**CLlr Jaspal Chhokar** - No comment received.

### Parish/Town Council Comments

**Denham Parish Council** – 8<sup>th</sup> November 2023

Denham Parish Council support the applicant but would like to ensure that the following conditions apply; There is approximately 60m distance between the extraction site and the houses. Will put in a bund 3m high to act as a sound barrier, ideally would like a 5m bund if possible. Residents would support this if it can be done. No imported materials to infill. Operating hours 8am to 4.30pm Monday - Friday. No working on Saturday and Sunday to protect residents amenity.

6<sup>th</sup> April 2023

The local residents are concerned about the level of noise and dust issues from the works being proposed at Knighton-way Lane. The planning statement 4.19 (page 7) refers that it is recommended that the dust management scheme is updated and one of the dust monitors is relocated to the eastern edge of the site to provide ongoing monitoring of dust levels throughout the development towards the nearest receptors in Knighton-way Lane. The noise assessment carried out by WBM Ltd; Acoustic Consultants confirm that the proposed development can be carried out within the existing approved noise limits for the site.

### Consultation Responses

**BC Archaeology** – Consider that the application site includes or has the potential to include heritage assets of archaeological interest of potentially national significance and concur that a geoarchaeological deposit model is produced and that areas of high potential are defined by

detailed test pitting. The information from should enable potentially nationally significant archaeological assets to be preserved in situ.

If planning permission is granted for this development, 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 205.

**BC Rights of Way** – Comments upon the extension prolonging the inconvenience pedestrians experience negotiating the gates along DEN/25/1 but notes this is relatively small.

**BC Ecology** – No objection subject to condition requiring an ecological management plan and an update to the Biodiversity Metric. This update was subsequently carried out.

**BC Ecology (Newts)** – As the site has poor connectivity to suitable ponds for great crested newts and many barriers to dispersal in the landscape including large busy roads, urban development and an active quarry site. I am satisfied that if this development was to be approved, it is unlikely to cause an impact on great crested newts and/or their habitats. A great crested newt informative has been provided.

**BC LLFA** – The LLFA has no objection to the proposed development and recommends that should planning permission be granted by the Local Planning Authority, the proposals are carried out in accordance with the approved Flood Risk Assessment.

**BC Highways** – No objection to the proposed development in Highway terms, subject to a condition limiting the number of vehicle movements to no more than 296 HGV movements per day (148 in, 148 out), and a condition requiring the submission of a revised site layout.

Note that the existing access would be retained, and no alterations are proposed to this access point. Drawing no. M12.162(N).D.002 shows the proposed layout for the sites restoration. I have concerns that no turning area or parking has been provided for vehicles. It is also required that these elements are included within the proposed layout.

Given however, that these outstanding issues relate to the internal layout of the application site, I am satisfied that they could be addressed by condition if you were minded.

**BC Landscape** – Accepts the conclusions of the LVIA and advises conditions securing detail of landscape proposals (planting species (which should be native) & specification, levels, boundary treatments) and to ensure establishment over five years and subsequent maintenance. These aspects are important as they will ensure the moderate beneficial effects predicted by the LVIA.

**BC Arboriculture** –

Recommends a Tree Protection Plan and Arboriculture Method Statement is secured by condition.

**BC Heritage** – Whilst there are a number of listed building around the periphery of the extended site, it is felt the proposal which I understand to include restoration after the extraction would not have an impact on these designated heritage assets. As such I have no heritage concerns regarding the proposal.

**BC Waste Management** – No comment received.

## **BC Environmental Health –**

### *Noise*

Recommends conditions setting the hours of operation and conditioning noise levels at noise sensitive properties.

### *Air Quality*

Recommends a condition requiring a dust management plan to be developed.

### *Contamination*

No comment.

**Crime Prevention Team** – No comment received.

**Environment Agency** – Have no objection to the proposal as currently submitted, providing the development proceeds in accordance with the submitted details. The application confirms that the additional mineral extraction will be undertaken in wet conditions, meaning it is not necessary to undertake any de-watering activities during mineral extraction. As a result, there will be no impact on the local water environment or water dependent features.

The application also contains sufficient detail to be satisfied that appropriate measures will be taken to safeguard and protect local watercourses through provision of sufficient buffers between the watercourses and the proposed works, plus the implementation of the proposed pollution prevention measures. It is essential that the proposed lake and watercourse(s) are kept separate as shown with the submitted plans. This is to ensure the integrity of the watercourse is retained as an independent water feature.

Finally, the application does not propose any waste related activity within the restoration scheme.

**Natural England** – No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutory designated sites (Kingcup Meadows and Oldhouse Wood SSSI) and has no objection.

**Denham Aerodrome** – No comment received.

**London Heathrow** – No safeguarding concerns subject to the Bird Hazard Management Plan being carried over to the new extension area and emergent planting being used on the waterbody.

**RAF Northolt / MOD** – There are no aerodrome height safeguarding objections with the proposals. Within this zone, the principal concern of the MOD is the creation of new habitats may attract and support populations of large and, or flocking birds close to an aerodrome.

Subject to the inclusion of a condition requiring the submission approval and implementation of a suitable bird hazard management plan there is no objection to the proposal.

**Historic England** – Do not consider that they need to be consulted.

**Health and Safety Executive** – This application does not fall within any HSE consultation zones. There is therefore no need to consult the HSE Land Use Planning (LUP) team on this planning application and the HSE LUP team has no comment to make.

**Campaign for Rural England Bucks** – No comment received.

**Ramblers Association** – No comment received.

**Thames Water** – No comments.

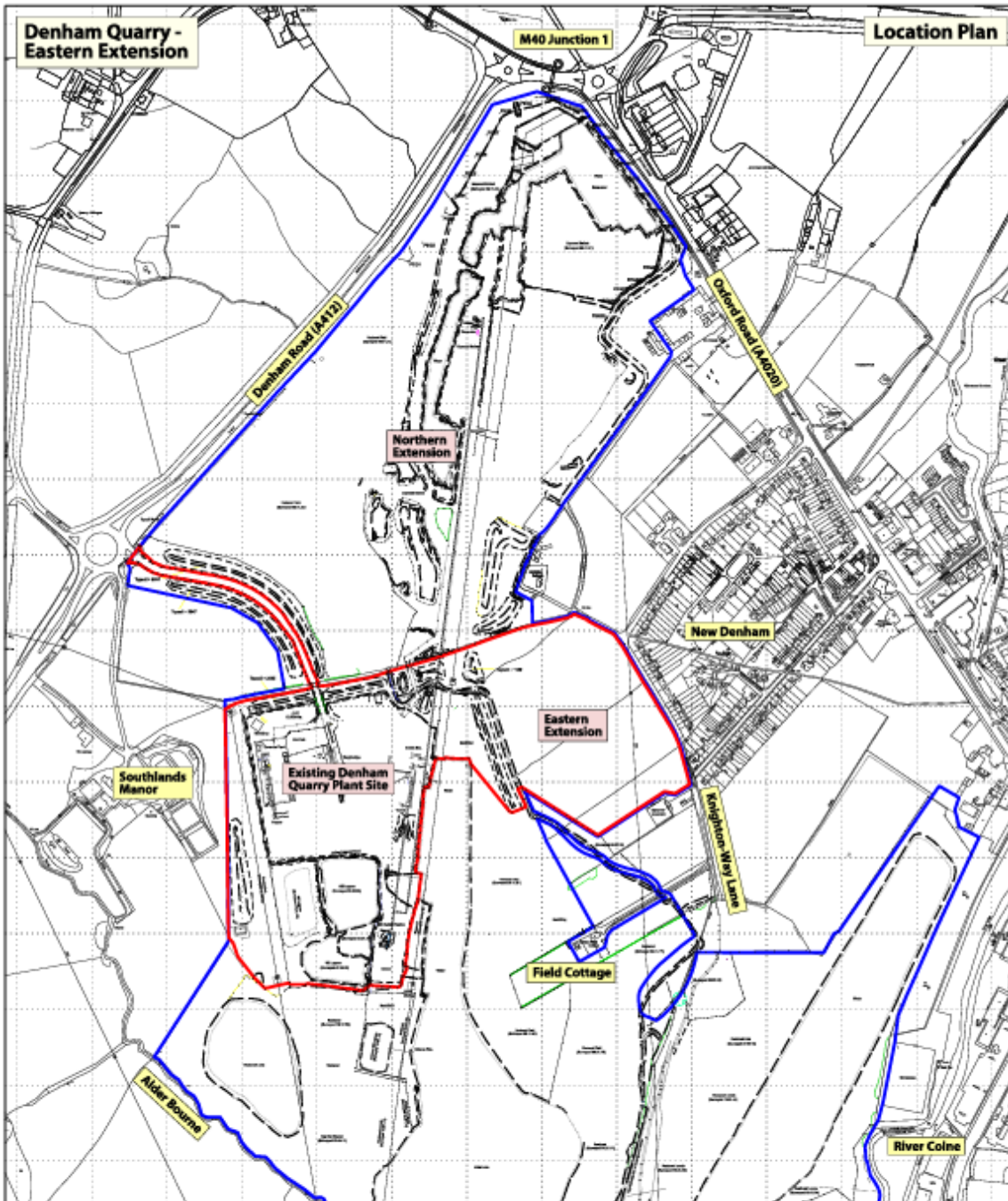
**Affinity Water** – Provide general guidance for construction, water quality, water efficiency and potential connections to water mains.

### Representations

No comments have been received supporting the proposal, no comments neither supporting nor objecting and 68 comments objecting to the proposal. In general, the comments raised the following matters:

- Cumulation of quarrying development at New Denham
- Noise
- Dust / Air pollution
- Human Health Impact
- Proximity of extraction to properties on Knighton-way Lane
- Concerns over quantity / quality of monitoring
- Traffic Impacts
- Impact upon Heritage Assets
- Screening Adequacy
- Delays to restoration
- Proximity of Working
- Landscape / Visual Impact
- Impacts upon flora and fauna
- Subsidence
- Silicosis
- Flood Risk
- Access to ROW on wider New Denham Quarry

# APPENDIX B: Site Location Plan



**Legend**

- Site boundary
- Land under control of the applicant

REV	AMD	NOTES	DATE
A	L.S.B.	Addition of land under control of the applicant & revised red line boundary	05.10.2022



THIS DRAWING MAY NOT BE USED WITHOUT CONSENT OF:  
 PLEYDELL SMITHYMAN LIMITED  
 20A THE WHARFAGE, IRONBRIDGE  
 SHROPSHIRE TF8 7NH  
 T. 01952 433211 F. 01952 433323  
 E. ps@pleydellsmithyman.co.uk  
 www.pleydellsmithyman.co.uk

<b>DRAWING STATUS</b>	
<b>PLANNING</b>	
PROJECT <b>DENHAM QUARRY - EASTERN EXTENSION</b>	
CLIENT <b>Summerleaze Ltd</b>	
TITLE <b>Location Plan</b>	
DATE <b>August 2021</b>	SCALE <b>1:5000 @A3</b>
DRAWN <b>LSB</b>	CHECKED <b>ML</b>
DRAW NO. <b>M12.162(n).D.001A</b>	



**Summerleaze**