Report to Surrey County

Abbreviations Used in this Report

AA Appropriate Assessment

AGLV Area of Great Landscape Value AMR Annual Monitoring Report

AONB Area of Outstanding Natural Beauty

ARDPD Aggregates Recycling DPD BAP Biodiversity Action Plan CC Surrey County Council

CD Core Document CS Core Strategy

DPD Development Plan Document

EA Environment Agency
ES Environmental Statement

GOSE Government Office for the South East

HA Highway Authority HGV Heavy Goods Vehicle

HRA Habitats Regulations Assessment

IC Inspector's Change LPA Local Planning Authority

mt/mtpa Million tonnes/million tonnes per annum

MPA Mineral Planning Authority
MPG Minerals Planning Guidance
MPS Minerals Planning Statement

MWDS Minerals and Waste Development Scheme

NE Natural England

#/para paragraph

PADPD Primary Aggregates DPD

PALAR Primary Aggregates Land Assessment Report

PC Proposed Change

PCPA Planning and Compulsory Purchase Act 2004

PMZ Potential Mineral Zone
PPS Planning Policy Statement

RS Regional Strategy

RSPB Royal Society for the Protection of Birds

SA Sustainability Appraisal
SAC Special Area of Conservation

SEA Strategic Environmental Assessment

SEP South East Plan

SEERAWP South East England Regional Aggregate Working Party

SMC Suggested Minor Change SMP Surrey Minerals Plan

SNCI Site of Nature Conservation Importance

SOS Secretary of State
SPA Special Protection Area

SPD Supplementary Planning Document
SSCS Surrey Sustainable Community Strategy

SSSI Site of Special Scientific Interest

TA Transport Assessment

Non-Technical Summary

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

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

Textual changes to reflect the publication in March 2010 of the Secretary of State's Proposed Changes to Policy M3 of the South East Plan.

Changes to the tables and numbers in the text to clarify the resource position in the light of the publication of the Secretary of State's Proposed Changes and the reduced sub-regional apportionment for Surrey.

Replacement of the monitoring framework to be consistent with the Core Strategy.

Textual changes to be consistent with the Core Strategy.

Inclusion of a new appendix to show the relationship between saved

compliance with legal requirements, particularly in relation to the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). They are addressed fully in the report on th

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

Separate requirements for concreting aggregate and soft sand

19. In line with MPS1 Annex 1 #4.5, the Proposed Changes' policy M3 confirms that MPAs should make separate landbank provision for soft sand and for concreting aggregate where possible and appropriate. In Surrey concreting

Reserves

- 21. Permitted reserves provide the plan's baseline. The evidence on reserves is taken from the Council's Annual Monitoring Reports (AMRs) [CD28, CD47-49]. Recent upward adjustments in the AMRs have added over 2mt to reserves, not all of which has been accounted for by new permissions or re-assessments of reserves. However a similar pattern of upward adjustment of reserve figures has been identified by other counties in the South East [CD404-405]. The information on reserves is collated from individual returns. The returns are confidential but the CC confirmed that it clarifies with the operator any reserve estimates that are unexpected. The CC has prepared Annual Monitoring Reports for the past 24 years, the last 4 reports as required by Government policy and regulation. No other method of setting the baseline has been shown to be more reliable. The AMR 2008/09 is the best information currently available and the CC is justified in using its figures on reserves as the baseline for the plan.
- 22. In calculating provision to be made in the plan, the permitted reserves of soft sand have been discounted by 2.28mt because production at Moorhouse Sandpit will continue after 2026. A number argued at the hearings that all its reserves should be included as contributing to supply during the plan period, there being no restriction by condition on output. However that assumes willingness on the part of the owner and operator to step up the current level of production, the physical means to do that and a market demand for the product from that site. Evidence from the CC was that permission was to 2030, the reserve was seen by the owner as long term, the site was worked as part of the operation of a large country estate and there is a close alternative source of sand at Westerham, Kent. In accord with #70 of the Practice Guide

justification for the selection of the

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

Landbanks

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

33. Taken as a whole the conclusion on the first issue is that, subject to my

appropriate standard of development.

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

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

40. The northern segment of the area is the preferred location for the processing plant which would be retained for the duration of working on areas D and E. Regard would have to be had to Green Belt policy and the plant area would have to be carefully designed and sited away from Manorcroft School. As for all other mineral sites, permission will not be granted unless it can be demonstrated that the scheme would not harm the living conditions of those living nearbynorthes -1..9(e2s of tho)-5(-1.2186 Tc0.syprop)-5.4(1 a p)hr btiontho-1.r

properly controlled and mitigated to within acceptable limits and such that

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

- capable of being satisfactorily addressed through good site design, planning conditions and, if necessary, obligations. Inclusion of this site is both justified and effective and accordingly meets the tests of soundness.
- 50. Hamm Court Farm, Weybridge (**preferred area C**) lies downstream and is within the ownership of a local mineral operator, Henry Streeter (Sand and Ballast) Ltd. It was excluded by the Local Plan Inspector in 1983 and listed in the 1993 Minerals Local Plan [CD30] as a Category 2 site (sites where there is a very strong presumption against working). However the continuing pressure to find workable resources in NW Surrey, and serious environmental constraints ruling out other sites, has led to it being looked at again and identified as a preferred area in the PADPD. The burden of objection related to potential impacts in terms of noise, dust, traffic, loss of biodiversity, harm to heritage assets, visual disturbance and disruption to local residents, the implications for flood risk and surface water drainage and uncertainty about the estimated yield as well as the iisfactoeWam1.21l3cl-i/rlool MI, We-5.-t((uractoeWsk and surface water drainage and uncertainty about the estimated yield as well as the iisfactoeWam1.21l3cl-i/rlool MI, We-5.-t((uractoeWsk and surface water drainage and uncertainty about the estimated yield as well as the iisfactoeWam1.21l3cl-i/rlool MI, We-5.-t((uractoeWsk and surface water drainage and uncertainty about the estimated yield as well as the iisfactoeWam1.21l3cl-i/rlool MI, We-5.-t((uractoeWsk and surface water drainage and uncertainty about the estimated yield as well as the iisfactoeWam1.21l3cl-i/rlool MI, we-5.-t((uractoeWsk and surface water drainage and uncertainty about the estimated yield as well as the iisfactoeWam1.21l3cl-i/rlool MI, we-5.-t((uractoeWsk and surface water drainage and uncertainty about the estimated yield as well as the iisfactoeWam1.21l3cl-i/rlool MI, we-5.-t((uractoeWsk and yellow)).

Surrey County

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

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

Policy MA3 - preferred areas for soft sand

- 60. There are two preferred areas in the plan for soft sand. Both were the subject of numerous representations in objection to their inclusion in the plan. Whilst identification in the DPD has clearly been unpopular locally, as noted at the hearings, the fact that a site may be unpopular does not of itself make it unsound in terms of the tests set out in PPS12.
- 61. Objections to **preferred area P**, Mercers Farm, covered the site's deliverability and likely yield, the impact of heavy mineral traffic using the

63. Hydrology is a key development requirement. The site is within a major

Surrey County Council Primary Aggregates DPD, Inspector's Report May 2011

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

Surrey County

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

79. A preferred area is one of known resources where planning permission might reasonably be anticipated subject to the usual tests of environmental acceptability. There are known resources here which would be sterilised if they are not worked before infilling is completed on the main part of the

- against CS policy MC11 as an extension to an existing site that would otherwise be sterilised.
- 83. Vicarage Farm, Trumps Farm and Eashing Farm were all identified as PMZs and have been subject to SA/SEA [CD80] and public consultation. **Eashing Farm** was identified as a preferred area in the 2006 Preferred Options but excluded from the PADPD in order to safeguard land within the Area of Great Landscape Value (AGLV) in advance of the AONB review (a matter addressed in the CS report). There is sustained public objection to the site and there is no longer any operator interest, thus raising a question over deliverability. At the hearing, the local community sought the inclusion in the plan of additional reasons why the site was unsuitable which were not accepted by the Council. As none go to the soundness of the plan, no change is recommended.
- 84. **Vicarage Farm**, to the north of Halliford Road, has no suitable direct access and would be worked with preferred area L. The site is visibly very exposed to nearby residential properties and was included as a Category 2 site (not to be worked) in the 1993 Minerals Local Plan. It could only be brought forward after extensive advance planting for working towards the end of the plan period as an extension to Watersplash Farm and issues around the transfer of the extracted material and final restoration remain unresolved. If Vicarage Farm is not allocated in the PADPD, around 0.75mt of sand and gravel would

Legal Requirements

88. My examination of the compliance of the PADPD with the legal requirements is

Overall Conclusion and Recommendation

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

Mary O'Rourke

Inspector

This report is accompanied by:

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

Appendix B (separate document) Council's Minor Changes

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

Appendix A – Council's Changes that go to soundness

Preface

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

Contents page

PA/PC/2	New	Add new Appendix - Relationship between 'saved'
	Appendix 2	policies of the Surrey Minerals Local Plan 1993 and
		the Surrey Minerals Plan Primary Aggregates DPD

3. Vision and objectives

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

5. Regional guidance on primary aggregates

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

6. The provision of primary aggregates in Surrey

PA/PC/5 Para 6.2 Amend paragraph as shown and insert additional sentences

'6.2 'The guideline for Surrey set proposed by the Panel report on the Partial Review of the South East Plan is 1.32 1.27 mtpa amounting to a total of 21.12 20.32 mt for the period 2010-2026. This can be regarded as the minimum to plan for, as it should be incre959 ecretary of State in March 2010. Subsequent

Appendix A – Council's Changes that go to soundness PA/PC/13 Para 6.3 Replace '23.74' with '22.94'

PA/PC/13	Para 6.3	Replace '23.74' with '22.94'		
PA/PC/14	Table in	Amend as shown below		
	Para 6.5			
			LOW	HIGH
			(Based on	(Based on
			regional figure	current RSS
			proposed by	apportionment
			Partial Review)	of 2.62mtpa
			apportionment	
			in "Proposed	
			Changes"	
			(March 2010))	
		Potential	23.7 <u>22.9</u> mt	44.5mt
		guideline		
		Permitted	8.0mt	8.0mt
		reserve		
		Resources	15.7 <u>14.9</u> mt	36.5mt
		required		

PA/PC/6 Table in Para 6.8

Appendix A – Council's Changes that go to soundness work undertaken for the plan indicates that available resources for concreting aggregate are becoming increasingly difficult to identify. The likely outcome is that identified potential reserves of concreting aggregate will be almost fully exploited before 2026 even under the low scenarios given above. The potential resource identified in Table 3 of 13.05mt compares with the estimated requirement of 13.25mt in Table 2. Additional resources occur within Preferred Area E and a modest change in production at this site could cover this gap. PA/PC/10 New Para Insert new paragraph 6.12 '6.12 Comparison of Tables 2 and 4 indicates that there should be a potential surplus of soft sand resources available to meet requirements in the plan period. However, the likely exhaustion of permitted

Appendix A – Council's Changes that go to soundness

Table <u>5</u>: Monitoring framework for primary aggregates policies

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

Appendix A – Council's Changes that go to soundness

APPENDIX 2 Relationship between 'saved' policies

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

1. Introduction

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

4. National Policy on Primary Aggregates

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

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

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

7. Preferred areas for sand and gravel extraction

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

8. Implementation and monitoring

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

Page 2 of 5

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

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

Appendix 1

PA/SMC/26 Preferred areas A, C, D, E, F, G, H, I, J, K, L, P and O

Key development requirements – Hydrology amend last clause to read:

'; attention is drawn to the guidance in Section 8 of the SFRA and the PPS25 practice guide and applicants will be expected to draw on this guidance in preparing the project level flood risk

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

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

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

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

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

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

Inspector

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