

**SUMMERLEAZE LTD: NEW DENHAM QUARRY, DENHAM, BUCKS
UB9 4EH**

**PROPOSED NORTHERN EXTENSION FOR THE EXTRACTION OF SAND
AND GRAVEL RESERVES AND RESTORATION TO AGRICULTURE
USING QUARRY OVERBURDEN AND INERT FILL MATERIAL AND
RETENTION OF EXISTING PROCESSING PLANT SITE AND CONCRETE
BATCHING PLANT.**

PLANNING STATEMENT

1. INTRODUCTION

Planning permission for the extraction of sand and gravel and the erection of a concrete batching plant at New Denham was granted to Summerleaze Ltd by Buckinghamshire County Council in March 2007 (Ref SBD/8201/06). Two extensions have subsequently been permitted:

- (i) The variation of planning conditions to work excluded areas within the permitted site (Ref 11/01460) granted on 9 September 2013.
- (ii) The extension into the Field Cottage buffer area (Ref CM/32/14) granted on 10 June 2014

The development commenced in 2008, including the construction of a new access roundabout from the A412 and the establishment of the plant site and concrete batching plant. Mineral extraction commenced towards the end of 2008 and New Denham Quarry is now the principal source of high quality sand and gravel in south Buckinghamshire.

Working and restoration to amenity lakes and woodland is taking place progressively. Extraction is presently continuing in Phase 4. Phases 2A and 3 have been restored as lakes. The remaining permitted reserves, excluding the plant site area, are sufficient for a further 2½ years at current extraction rates. The northern extension is required to enable mineral extraction to continue for an additional 6 years.

The proposed northern extension is located to the north of Footpath 25 (between Southlands Manor and New Denham) and bounded by the A412 (Denham Road) and A4020 (Oxford Road). It is proposed to restore the site to agricultural use following infilling with inert materials. The quarry plant site, including the concrete batching plant, would remain in its present location with sand and gravel being transported by ground conveyor.

The northern extension site is not within a 'Preferred Area' for sand and gravel extraction in the current Minerals and Waste Local Plan (2004 – 2016) Adopted in June 2006 and now out of date. This Plan identified the existing quarry site which has since been permitted and worked. Further extensions would be considered in a subsequent review of the Minerals Plan, but this was delayed.

The County Council adopted a Minerals and Waste Core Strategy in 2012. This provides the general minerals policies, but does not allocate additional sites. These

are to be included in the forthcoming Minerals Local Plan, but this has been seriously delayed. The northern extension site has been put forward for inclusion in the Plan. Summerleaze Ltd has a reasonable expectation that the northern extension would be allocated for mineral extraction in due course since it is an extension to an existing well sited quarry and has been ranked top in a comparative assessment of potential sites.

Hillingdon Outdoor Activity Centre Proposal (HOAC)

A separate planning application has been submitted by others to relocate the Hillingdon Outdoor Activity Centre (HOAC) from near Harefield. This is necessary because HOAC is on the proposed route of HS2. In this Statement this is called the HOAC Scheme. It involves the amendment to the approved quarry restoration scheme and includes a small extension to the quarry immediately west of New Denham. If this development is granted the additional area would be worked as an additional phase within the current extraction programme. The site contains sufficient sand and gravel reserves for up to 1 ½ years.

Environmental Impact Assessment (EIA)

A request for a Screening and Scoping Opinion was submitted to Bucks County Council on 8th October 2015 to determine whether the proposals would be subject to Environmental Impact Assessment (EIA). The Councils response dated 6 April 2016 confirmed that EIA would be necessary and indicates the scope of the Environmental Statement. A number of points of detail were clarified with the County Council and an EIA has been prepared to accompany the planning application to deal with the topics included in the Scoping Opinion (included in the Environmental Statement). The Environmental Statement is submitted as a separate self-contained document.

Pre-Application Consultation

A pre-application site meeting with County Council Officers was held on 19 January 2016 to view the site. The planning officers were aware that the site had been nominated for inclusion in the Minerals Local Plan and have raised no particular issues at this stage

The proposed northern extension has also been considered by the Quarry Site Liaison Committee which meets regularly to discuss current issues at the quarry. The proposal was considered at a meeting held on 5th April convened specifically to discuss the proposal. The members of the Committee raised no specific issues.

The pre-application discussions also involved the County Archaeologist since the Denham operations are of archaeological interest and significant investigations have been undertaken in the presently permitted areas. Discussions with the County Ecologist and Environmental Health Officer (South Bucks DC) have also taken place to clarify their requirements.

2. THE PLANNING APPLICATION

The planning application comprises:

Application Form for Minerals Development

Planning Statement

The following Drawings:

Location of Site	M12.162(g).D.032	1:50,000 @ A3
Site Location Plan	M12.162(g).D.033	1:5,000 @ A3
Current Situation	M12.162(g).D.001	1:5,000 @ A3
Block Phasing Plan	M12.162(g).D.002	1:5,000 @ A3
Phase 1 Working Scheme	M12.162(g).D.015	1:4,000 @ A3
Phase 2 Working/Restoration	M12.162(g).D.016	1:4,000 @ A3
Phase 3 Working/Restoration	M12.162(g).D.017	1:4,000 @ A3
Phase 4 Working/Restoration	M12.162(g).D.018	1:4,000 @ A3
Phase 5 Working/Restoration	M12.162(g).D.019	1:4,000 @ A3
Phase 6 Completion Infilling	M12.162(g).D.019	1:4,000 @ A3
Concept Restoration Scheme	M12.162(g).D.005	1:5,000 @ A3

The following permitted drawings relating to the retention of the Plant Site

Plant Site Layout	DEN/500B	1:1000 @ A3
Plant Site Elevations	DEN/501A	1:200 @ A1
Concrete Batching Plant	2513/01A	1:500 @ A3
Concrete Plant Overlay	2513/02B	1:500 @ A3
Weighbridge Office	SB/150/1	1:100 @ A3
Mess/Canteen	SB/150/2	1:100 @ A3
Workshop	SB/150/3	1:1/200 @ A3
Access Roundabout	1250/12	1:1000 @ A3

The single A1 drawing has been printed at A3 for inclusion in the hard copies of the submission.

The following drawing is submitted showing an amendment to the above phasing in the event that the HOAC development progresses since the working of the two areas will overlap for operational reasons:

Block Phasing	M12.162(g).D.006	1:6000 @ A3
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Please note that Phases 5A/B, 6, 7 & 8 in the above drawing mirror Phases 1-4 of the Denham North scheme. Therefore Phases 2-4 of the northern extension application would follow extraction of Phase 5 (North) shown on the combined working scheme.

Tree Survey

The tree survey is included in the planning application as and also in the CD version of the Environmental Statement.

The following assessments are included in the Environmental Statement:

- ES Planning Statement including Alternatives
- Landscape and Visual Impact
- Hydrogeology, Hydrology, Drainage and Flood Risk
- Ecology
- Archaeology and Historic Environment
- Noise
- Air Quality
- Soils
- Highways and Traffic

Site Description

New Denham Quarry is located to the north west of Uxbridge and west of the River Colne with access from the A412 Denham – Iver Heath/Slough Road. It is south of the A40/M40 and east of the M25. The nearest settlement is New Denham.

The additional land for mineral working lies to the north of Footpath 25 (between New Denham and Southlands Manor) and bounded by the A412 (Denham Road) and A4020 (Oxford Road). The extension site has an area of approximately 28Ha and is mainly in agricultural use as a horse livery and grass crop, but contains a block of woodland known locally as ‘The Clump’. The land forms part of the Bucks County Council’s smallholding estate and is occupied by tenant farmers based at Ivy House Farm and New House Farm. These tenancies will cease upon the grant of a minerals lease to Summerlease Ltd, although it is assumed that Ivy House farmhouse will remain in residential use. The County Council will retain ownership of the land during and after mineral extraction and restoration.

The nearest residential properties are:

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

The main built up area of New Denham including Knighton Way Lane lies to the east and is separated by 150-200 metres of agricultural land. Nearby Commercial properties in Oxford Road are Smiths Garden Centre and KFC.

The land affected by the northern extension is generally flat but lies outside of the flood plain (Zones 2 & 3). It is crossed by the Rusholt Brook which flows intermittently. The site contains a rectangular block of woodland (the Clump) and a number of hedgerows within and on the perimeter of the site. An electricity line crosses the site from the Electricity Substation to the south of the quarry. Two pylons are located within the extraction area and the line crosses the Clump.

Footpath 25 is located on the southern boundary of the extraction area, but no rights of way are directly affected by extraction. Footpath 25 is presently crossed by the quarry access road where a controlled crossing is provided (footpath users press a button to close the gates). An additional road crossing will be required to access the

northern extension and similar provision will be made. The ground conveyor will pass beneath the path.

In terms of planning policy the site lies within the Metropolitan Green Belt (where mineral working is acceptable in principle) but is otherwise unaffected by broad brush planning constraints such as landscape designations. The site is not directly affected by ecological designations, although there are a number in the surrounding area that are considered in the Ecological Assessment.

The Proposed Development

The application site has an area of 40.5Ha comprising:

Additional Extraction Area	24.3 Ha
Buffer Zones/Margins	3.8 Ha
Existing Plant Site and Associated Lagoons	8.4 Ha
Existing Site Access	4.0 Ha

A minerals assessment has been carried out including a borehole survey (included in the Environmental statement hydrology report). It is estimated that the Northern Extension contains 1.6 million tonnes of sand and gravel for sale. The sand and gravel would be extracted at a forecast rate of 250 – 300,000 tonnes per annum over a period of 5 – 6 years. Extraction would follow on from the completion of extraction within the presently consented area (excluding reserves remaining under the plant site). It is anticipated that these permitted reserves will be worked out during 2018. Extraction is therefore expected to commence in 2018 and continue until 2024. A further two years is required to complete infilling and restoration.

In the event that the HOAC Scheme proceeds the life of the site would be extended by approximately 1 ½ years

Working Scheme

The site would be worked in four phases as indicated on the Block Phasing Plan and individual Phasing Plans. The phasing drawings include a detailed description of the operations in each phase and there is no need to duplicate that information here. The main points are:

- (i) Extraction would commence in Phase 1 to the west of the Rusholt Brook and then continue into Phases 2 – 4 east of the Rusholt Brook in a clockwise direction. Rusholt Brook will be retained on its present alignment within an undisturbed corridor. The final area to be worked will be the plant site which has permission for sand and gravel extraction under the existing consents.
- (ii) To protect the amenities of residential properties including Ivy House Farm, Brickfield Cottage and along Oxford Road buffer zones have been provided together with soil bunds. The bunds have a minimum height of 3-5 metres and will be seeded with grass. These measures are based on the recommendations of noise and amenity assessments.

- (iii) Topsoil and subsoil will first be stripped and either stored temporarily in screening bunds on the site perimeter as indicated on the plans or directly placed to restore worked land. In addition to protecting Ivy House Farm and Brickfield Cottage bunds are located alongside the A4020 and part of the A412 for amenity reasons. A low bund will also be provided along the northern side of footpath 25 where there is presently no hedgerow to screen views into the quarry site
- (iv) Sand and gravel would be extracted under water by an excavator and stockpiled before being loaded into a feed hopper by a loading shovel and onto a ground conveyor linking and transported to, the existing plant site. No dewatering of the mineral will take place. The line of the conveyor is shown on the plans. The main conveyor line will cross Footpath 25 at level and a shallow bridge will be constructed over the conveyor enabling pedestrians and horses to cross safely. For Phase 1 the conveyor will also need to cross Rusholt Brook. The conveyor network will be extended as extraction progresses.
- (v) Silt lagoons will be formed in the southern part of Phase 1, with silt being pumped from the plant site. This will enable the existing silt lagoons to be restored.
- (vi) Infilling with inert material will follow extraction as quickly as practicable to ensure the progressive restoration of the site. The land will be restored to existing ground levels subject to minor adjustments to improve drainage. Infilling will be by tipper lorries and dumper trucks using the haul routes shown on the plans. An additional haul road crossing of Footpath 25 will be required and a controlled crossing is proposed the same as the existing road crossing.
- (vii) The land will be restored for agricultural use, and will incorporate a replacement woodland together with a number of hedgerows. The final area to be restored will be the plant site.

Working Scheme including HOAC

The separate proposal to relocate the Hillingdon Outdoor Activity Centre (HOAC) to New Denham Quarry involves the extraction of sand and gravel to the south west of Knighton Way Lane, New Denham. In practice this area will be regarded as an additional phase of mineral extraction. It contains an estimated reserve of 380,000 tonnes of sand and gravel which would extend the life of the quarry by approximately 1½ years.

For operational reasons the land would be worked in parallel with Phase 1 of the proposed northern extension. A plan has been included in the application showing how this would work. Both areas are shown as Phase 5, with Phases 5A (south) and 5A (north) being worked at the same time, and similarly for Phase 5B north and south. This is particularly to provide fill capacity in the northern extension for surplus material from the HOAC Scheme. Once extraction of Phase 5B south has been completed extraction would be restricted to the northern extension progressing in accordance with the phasing proposals for that area.

Landscaping

The site is predominantly agricultural land used for grazing and grass crop in association with the Ivy House Farm livery. The site also contains a rectangular blocks of woodland (the Clump) towards the centre with a gap where crossed by the overhead electricity line. Part of the woodland will be retained on the eastern boundary, but the remainder would be lost by working. The restoration proposals include the replacement of the woodland. Trees along the route of the Rusholt Brook will be retained in an undisturbed corridor. A number of other trees within the site will be lost, but these are relatively few in number. The trees and hedgerows along the boundary of the A412 and A4020 will be retained, maintained and strengthened by additional planting as necessary. A tree survey has been carried out to identify trees to be lost and retained (enclosed with planning application and also in electronic version of the Environmental Statement)

Restoration

It is proposed to restore the land for agricultural use at existing ground levels, subject to minor adjustment of levels to enhance drainage. Infilling with imported inert material and quarry waste (as at the existing quarry) will take place progressively following sand and gravel extraction as shown on the Phasing Plans. Upon completion of filling of each phase topsoil and subsoil will be replaced, either from storage bunds or by direct placement from future extraction areas. Replaced soils will be ripped as necessary to break up any compaction and provide drainage and prepared for cultivation using agricultural machinery. Soils will only be handled in appropriate weather conditions.

Extensive planting is proposed as part of the restoration scheme including the replacement of the woodland block and hedgerows. The plant site will be the final phase to be worked, and restored in accordance with the approved restoration scheme for the quarry. The access via the roundabout onto the A412 is to be retained for the afteruse of the site.

Soil Handling

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

Aftercare

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

Plant Site and Concrete Batching Plant

Under the current planning permissions the minerals processing plant and concrete batching plant are required to be removed by 2021. These will be required beyond

this date in connection with the proposed northern extension. The plant site and concrete plant are therefore included in the planning application. The drawings approved as part of the current planning permissions are therefore included in this submission.

Lighting

Low level security and safety lighting is installed on existing plant and buildings. The plant site is not floodlit. Working and restoration is limited to daylight hours for safety reasons.

Plant and Machinery

The mobile plant and machinery typically used at the quarry comprises:

- Excavator
- Loading Shovels
- Dump Trucks
- Dozers (for filling)

Operational Hours

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

- 7.00am to 6.00pm Mondays to Fridays
- 7.00am to 1.00pm Saturdays
- 1.00pm to 6.00pm Saturdays for maintenance only

No operations are carried out on Sundays or Public Holidays

Access and Traffic

The existing quarry access via a roundabout onto the A412 will be used without any modifications. The working of the northern extension will not in itself alter the existing number or pattern of HGV movements to and from the site since the annual rate of extraction will not be directly affected. The level of activity will fluctuate on a daily basis depending on the demand for aggregates and for inert filling.

Planning conditions attached to the current minerals planning permissions limit the HGV movements to a maximum of 296 per day (148 in and 148 out). The daily numbers of HGV movements have generally been well within the permitted limits. The normal average level of daily HGV movements is estimated to be 174 movements per weekday.

Employment

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

Overall Period of Development

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

In the event that the HOAC Scheme is approved this will add an estimated 18 months to the overall working and restoration period. In this scenario it is proposed to extend the life of the quarry until 31 December 2028.

3. PLANNING POLICY

Land at New Denham has been identified for possible sand and gravel extraction in Minerals Plans dating from the late 1970's. The northern area subject to the present application was identified for working in the Draft Minerals Plan in 1990, but was not carried forward into the adopted Plan in 1995 when the existing working area was allocated. This was because lower quality agricultural land was available elsewhere at that time. However it was recognised that the northern area could come into consideration in future mineral plans depending on landbank requirements. It is proposed to restore the land back to agriculture.

The proposed northern extraction area is not presently within a Preferred Area for sand and gravel extraction in the adopted Minerals and Waste Local Plan (June 2006). However this is now out of date and the replacement plan identifying new Preferred Areas has been delayed. The site has been nominated for inclusion in the forthcoming Minerals Sites Plan, and has been acknowledged as a potential site for mineral extraction for some 40 years. The present quarry was identified in the Adopted Plan some 10 years ago and the company has a reasonable expectation that the proposed northern extension would be included in the new Plan to enable a continuation of working. However Summerleaze Ltd needs to bring forward an application in advance of the emerging Minerals Sites Plan to ensure the continuing operation of the quarry.

Buckinghamshire County Council adopted a Minerals and Waste Core Strategy in 2012. This establishes the broad policies for mineral working and sets out the criteria for new sites pending the adoption of the new Minerals Sites Plan. It is also necessary to consider national minerals policy. The planning policies for South Bucks District Council have been reviewed, but add nothing new.

In this section we consider:

- (i) Buckinghamshire Minerals and Waste Core Strategy (Adopted November 2012).
- (ii) Buckinghamshire Minerals and Waste Local Plan (June 2006)
- (iii) The emerging Minerals Sites Plan

- (iv) The National Planning Policy Framework (NPPF) March 2012 and associated Guidance (NPPG)

Buckinghamshire Minerals and Waste Core Strategy (Adopted November 2012)

Policy CS1 Minerals Safeguarding: Identifies an extensive area of South Buckinghamshire (including the Denham area) where minerals will be safeguarded from sterilization by other development.

Comment: This policy recognises the economic significance of the sand and gravel resources in this area.

Policy CS4 Landbank: The policy states that:

‘Adequate and steady provision will be made to maintain a landbank of sand and gravel equivalent to at least 7 years worth of supply over the period to 2026, based on the prevalent agreed local annual supply for Buckinghamshire.’

Comment: This policy needs to be considered together with the policy and guidance in the National Planning Policy Framework (NPPF) Planning Practice Guidance (NPPG) and Local Aggregate Assessment (LAA following section). We would note at this stage that the 7 year supply is a minimum, not a maximum, and the overall objective is to maintain adequate supply. This can be achieved by extending and maximising resources at existing operations.

Policy CS5 Preferred Areas: This policy sets out the strategy for Preferred Areas and criteria for planning applications. Sites will be identified in the Minerals Local Plan (progress uncertain, but adoption in late 2018 according to Bucks CC website). The following considerations are listed for the site selection process:

- (a) Priority to be given to extension sites where environmentally acceptable.
- (b) Good access.
- (c) Impact on water resources.
- (d) Outside of Chilterns AONB.
- (e) Impact on amenity.
- (f) Impact on nationally designated ‘environmental assets.’
- (g) Cumulative impacts within the area.

Comment: The priority given for quarry extensions gives strong policy support for the proposal. As noted above the proposed northern quarry extension has been nominated for inclusion in the forthcoming Minerals Sites Plan. The site meets all of the above considerations and there is a reasonable expectation that it will be included. The Core Strategy does not contain a policy for mineral working outside of Preferred Area. However, the possibility of planning applications coming forward prior to the adoption of the Minerals Plan is recognised (para 4.35). In this instance proposals

will be tested against the ‘saved’ policies in the Minerals & Waste Local Plan (see below), and with the considerations listed in Policy CS5 above.

The approach of the Core Strategy is therefore to treat any applications for mineral working outside of Preferred Areas on their merits. The previous extension at Field Cottage was allowed within this policy framework.

Policy CS15 Landfill: Provides for inert landfill where new mineral extraction takes place.

Comment: As proposed.

Policy CS19 Local Environmental Assets: Seeks the protection of ecological sites, landscape, heritage assets including archaeology, water resources and the Colne Valley Park.

Comment: Detailed consideration has been given to the impact on water resources, ecology and archaeology and the proposals are satisfactory. Trees will be lost, but compensatory planting is proposed within the restoration scheme

Policy CS20 Green Belt: States that proposals for mineral extraction will be permitted in principle, subject to compliance with other policies.

Comment: There is no objection to the proposal on Green Belt grounds.

Policy CS22 Design & Climate Change: Concerns greenhouse gas emissions, minimising haulage distances, reducing flood risk and enhancing landscape and biodiversity.

Comment: By maintaining minerals supply to the established local markets minimises haulage distances. A flood risk assessment has been carried out, and landscape/biodiversity improvements are proposed.

Policy CS23 Environmental Enhancement: Seeks environmental enhancements as appropriate and the retention of existing public or permissive paths.’

Comment: The site will be restored to its existing agricultural use with replacement hedgerow, tree and woodland planting. There is no direct impact on rights of way or permissive paths. The overall quarry restoration scheme facilitates provision for additional footpaths and recreational use.

Buckinghamshire Minerals and Waste Local Plan (June 2006)

The majority of the policies in the MWLP are either not ‘saved’ or are replaced by policies in the Core Strategy. The relevant remaining operational policies appear to be:

Policy 7 Traffic: Encourages use of rail or canal transport.

Comment: Canal transport via the Grand Union Canal to the south east of the quarry was considered at the time Denham Quarry was originally planned. However

this was not feasible due to the need to cross the River Colne, lack of wharfage and ownership issues.

Policy 28 Amenity: Seeks to protect the amenity of local residents having regard to the level of disturbance from noise, dust, fumes, gases, odour, illumination, litter, birds or pests.

Comment: The proposed extraction and restoration involves entirely inert materials and raises no concerns re odour, litter or pests etc. The quarry has operated for several years with no significant concerns regarding noise and dust. Noise and dust assessments have been carried out for the present proposal and the quarry extension will comply with normal operating standards and planning conditions. The site will not be illuminated apart from low level security lighting in the plant site area.

Policy 29 Buffer Zones: Requires provision of adequate buffer zones. Indicative buffer zones and broad guidance are included in Supplementary Planning Guidance (June 2006)

Comment: Buffer zones and screen bunding have been incorporated into the working scheme to protect the amenities of local residents, based on the noise assessment and taking into account visual impact.

Policy 31 Restoration and Aftercare: Requires restoration to an appropriate use and aftercare schemes for minerals sites. Notes the issue of bird strike near aerodromes.

Comment: An appropriate agricultural restoration scheme is submitted and a 5 year aftercare programme will be undertaken as for the existing quarry. The site will be restored to land and the proposal therefore does not raise any bird strike concerns. There is no current restoration guidance for the site, but the proposal to infill and restore to original ground levels is consistent with previous guidance prepared by Bucks County Council in connection with the Replacement Minerals Plan (Evidence submitted to Replacement Minerals Plan Inquiry 1991).

Policy 34 Aviation Safeguarding: Requires consultation with relevant airport safeguarding authorities within safeguarded areas.

Comment: The site lies within the safeguarding areas for London Heathrow and RAF Northolt. Both are familiar with the quarry and have been involved in the agreement of the present Bird Management Plan for the site. They have been consulted by Bucks CC at the EIA Screening/Scoping stage and will be consulted on the planning application. The site is to be restored to agriculture and therefore does not raise any significant long term airport safeguarding issues.

The Emerging Minerals and Waste Local Plan

It had been hoped that the emerging Minerals and Waste Local Plan, which will identify additional Preferred Areas for sand and gravel extraction, would have been further advanced at this time since the existing Minerals Plan it will replace, adopted in 2006, is significantly out of date. At the time of writing no Draft Plan has been published and the adoption of the Plan is scheduled for October/November 2018 in the current Development Plan Scheme. This application has therefore of necessity been prepared in the absence of any up to date plan identifying preferred areas.

At the public inquiry into the Adopted Minerals and Waste Local Plan in April 2005 Bucks County Council acknowledged that further work would be required to identify future sites for mineral working, and that this should be done in a Minerals DPD at the earliest opportunity. Accordingly the County Council assessed a number of areas for acceptability for new Preferred Areas, including the proposed Denham North site, and these were published in their 'Preferred Options Consultation' in September 2007. The relevant extracts of this report are included at **Appendix 1**.

The northern extension to New Denham Quarry (which at that time had been permitted, but not commenced) was coded ASP1, meaning an Area Subject to Phasing. These were areas required to ensure provision until the end of the Plan Period in 2021. It was envisaged that the working of this area would follow on from the working of the existing quarry site allocated in the 2006 Plan.

The Preferred Options Consultation included a comparative assessment of potential minerals sites in Table 4. It can be seen that New Denham (northern extension) is ranked second in the list of 11 sites. It should be noted that the assessment was carried out by independent planning consultants (Jacobs) in December 2006.

In the event work on the Minerals DPD was abandoned. However the assessment of potential sites carried out in 2006/7 is part of the evidence base for the emerging plan since no new assessment has been published. No significant new sites have emerged and the basis of assessment will not have materially changed. The assessment is therefore a material consideration which must carry weight in the determination of this planning application. It should be noted that the top ranked site, Berry Hill Farm, Taplow has since been granted planning permission, meaning that Denham is now the top ranked site. Other sites on the list have also been permitted without being formally allocated in any Minerals Plan in order to meet ongoing demand.

The application has been nominated for inclusion in the emerging Minerals Local Plan and assessed against other potential sites. An independent assessment has ranked the site second out of 11 sites. The top site has since been permitted. The company therefore has a reasonable expectation that the site would be allocated in the new Plan, and would have been already if the Plan had not been delayed.

The National Planning Policy Framework (NPPF) March 2012

Minerals are considered in Part 13:

Para 142 stresses the importance of maintaining a sufficient supply of minerals to provide for the Country's needs.

Para 144 also states the great weight of the benefits of mineral extraction, including the economy.

Para 145 states that mineral planning authorities should plan for a steady and adequate supply of aggregates by preparing Local Aggregates Assessment (LAA) based on a rolling average of 10 years sales data and other relevant local information.

Authorities should also maintain a landbank of at least 7 years for sand and gravel whilst ensuring that the capacity of operations to supply a wide range of materials is

not compromised. Longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets and productive capacity of existing plants. Large landbanks bound up in very few sites should not be allowed to stifle competition.

Para 112 concerns agricultural land. Local Planning Authorities should take into account the economic and other benefits of the best and most versatile land. Where significant development of agricultural land is considered necessary, local authorities should seek to use areas of poorer quality land in preference to that of high quality.

Planning Practice Guidance Framework (NPPG)

The NPPG expands upon the NPPF. Of particular relevance to this application are the following:

Quarry Extensions (Para 010): These must be considered on their individual merits, but taking into account economic considerations – ie continuation of extracting resource, retaining jobs, and being able to utilise existing plant and infrastructure.

Landbanks: The NPPG contains detailed advice on the use of aggregate landbanks and play an important role in the preparation of minerals plans and in determining planning applications. In this case due to the lack of any up to date Minerals Local Plan we are primarily concerned with the guidance concerning planning applications (para 084):

There is no maximum landbank level and each application must be considered on its own merits regardless of the length of landbank. However, where a landbank is below the minimum level this may be seen as a strong indicator of urgent need.

There are a number of reasons why an application for aggregate minerals development is brought forward in an area where there exists an adequate landbank. These could include:

- Significant future increases in demand that can be forecast with reasonable certainty;
- The location of the consented reserves is inappropriately located relative to the main market areas;
- The nature, type and qualities of the aggregate such as its suitability for a particular use within a distinct separate market; and
- Known constraints on the availability of consented reserves that might limit output over the plan period.

Comment on NPPF/NPPG:

There are three significant points to be drawn from the NPPF and NPPG:

1. The overall objective is to maintain a steady and adequate supply of aggregates. In our view this can best be achieved by extending existing quarries where this is possible.

2. Applications for extensions need to be considered on their merits, but economic considerations including the retention of jobs, and utilising existing plant, highway access and infrastructure need to be taken into account.
3. There should be a flexible approach to the use and application of landbanks and each application should be considered on its own merits. The question of landbanks is considered in more detail in the next Section.

Policy Conclusions

Because of the delay in preparing the Minerals Local Plan no new Preferred Areas have been identified since the Minerals and Waste Local Plan, prepared in the early 2000's was adopted in 2006. The Core Strategy (2012) recognises this position and states that any applications outside of Preferred Areas should be considered on their merits. The Core Strategy gives strong policy support for the extension of existing quarries as in this case. On its merits the proposal complies with the site selection criteria and environmental policies in the Development Plan.

Extensions to Denham Quarry, including the application site, have been nominated for inclusion in the future Minerals Plan. The site complies with the considerations for selecting Preferred Areas listed in the Core Strategy, particularly since it is an extension to an existing quarry, and there is a reasonable extension it would be included within a Preferred Area in due course.

The question of need and landbanks is considered in the following section.

4. PLANNING CONSIDERATIONS

The proposal is for an extension to the existing New Denham quarry that has operated successfully for several years without raising any significant planning issues. The quarry operates under a number of schemes, for example dealing with noise and dust management, approved under the existing planning permissions. These schemes will be continued. The existing site infrastructure, including the access, plant site and offices will be retained together with the concrete batching plant.

The main planning issues are considered to be

- Need (including landbank assessment)
- Restoration materials availability
- Landscape and Visual Impact
- Ecology
- Local Amenity (noise, dust and visual)
- Effect on Footpaths
- Surface and Groundwater (including Flood Risk)
- Archaeology

The Environmental Statement includes assessments of landscape, ecology, soils, noise, dust, water issues and archaeology prepared by the specialist consultant team.

Traffic is not considered to be a main issue and is considered briefly under ‘other issues’ together with soils, Green Belt policy and trees.

Need

The most up to date published information on aggregates supply in Buckinghamshire is contained in the Local Aggregates Assessment 2015 (LAA). This contains information on permitted reserves up to 31 December 2014. Bucks CC has been unable to provide a more up to date information. At that time, for sand and gravel:

Permitted reserves	10.07 million tonnes (mt)
10 year average sales	0.85 mt
Supply (landbank)	11.8 years

The above figures include recent permissions for new quarries at George Green, near Slough, and Denham Park Farm, east of the M25 near Denham. They also include the permission for the most recent extension to New Denham Quarry (the Field Cottage extension) granted in June 2014. The permitted and operational Springfield Farm site (Beaconsfield) has large reserves but a production limit and is a poorer quality glacial sand deposit that serves different markets to river valley sand and gravel.

We are unaware of any significant permissions for sand and gravel extraction being granted in Buckinghamshire since that date. There are none indicated in the papers of the Development Control Committee since September 2014, and none known through our local knowledge. Updated information has been requested from the County Council but is not available.

We are aware that an application has been submitted to extract sand and gravel at Slade Farm, Hedgerley (August 2015). This is for the extraction of 1.25mt of sand and gravel. It is not comparable to the proposed Denham Quarry extensions since it is for a new stand alone quarry and for lower quality aggregates.

On the assumption that no further permissions have been granted the present landbank will be approximately 8.8 million tonnes on the basis that approximately 1.27 million tonnes will have been extracted since 31 December 2014. Applying the latest published 10 year average sales average of 0.85mt the landbank is presently 10.35 years. However if the annual apportionment figure in the Adopted Minerals and Waste Core Strategy 2012 is used (1.05 million tonnes) the landbank is reduced to 8.4 years. This provides a better indication of future demand since the 10 year average is over influenced by the economic downturn since 2008. Quarries at East Burnham and Denham Park Farm shown as inactive in the LAA have since opened, thereby increasing production. In the past 2-3 years there has been a general increase in construction activity. It is also evident that there are a number of significant infrastructure projects in the pipeline in the area, including HS2, Western Rail Access to Heathrow and the M4 Smart Motorway Scheme that are likely to increase local demand. Whilst the landbank is above the minimum requirement of 7 years, it is not excessively so.

It is explained in the NPPF (National Planning Policy Framework 2012) that landbanks are an indicator of the security of aggregates supply. Other considerations are the need for a steady and adequate supply of aggregates taking into account local considerations such as the productive capacity of existing sites and distribution of

permitted reserves. It is evident in the Local Aggregates Assessment 2015 that New Denham Quarry is one of only two long term active quarries in Buckinghamshire at the end of 2014. Denham Park Farm quarry has since opened, but is a different material and serves a different market area. A substantial proportion of the permitted reserves are also tied up at the other large operational site (Springfield Farm) which has a production limit.

The existing permitted reserves at New Denham Quarry are sufficient for approximately 2½ years. It is the principal source of high quality sand and gravel in south Buckinghamshire, and supplies the on-site concrete batching plant. There is a need to grant further extensions to New Denham Quarry to maintain production of sand and gravel, and concrete. The Northern Extension would provide reserves for a further 6 years. In the event that the HOAC Scheme progresses both extensions would secure a long term quarry life of approximately 10 years - a period of expected economic growth with major local infrastructure projects.

In the context of national planning policy and guidance:

- The proposed quarry extension will maintain a supply of aggregates to an established market from this site and therefore help maintain a steady and adequate supply of aggregates from south Buckinghamshire.
- There is a significant demand for aggregates in this area as a consequence of the general economic upturn in the last two years, and for major infrastructure projects in the pipeline. These are not reflected in the latest Local Aggregates assessment.
- The reserves are a high quality river valley deposit with a high proportion supplying the on-site concreting plant.
- An extension has significant economic and sustainability benefits through the retention of jobs and continuing use of existing plant and infrastructure.

The landbank is above the minimum level of 7 years, but there is no maximum landbank level and each application must be considered on its own merits. For the reasons given above, the application merits approval in order to maintain the supply of aggregates over the next 8 years. Additional permitted reserves are required to maintain production in the short term. There is a strong case on need grounds to permit the application.

Restoration Materials Availability

Policy CS15 of the Adopted Minerals and Waste Core Strategy provides for the filling of new extraction sites with inert material. The existing quarry is being restored as lakes, but includes significant areas of woodland and grassland (eg the Field Cottage extension area). The existing quarrying operations therefore involve the importation of significant quantities of inert fill.

The availability of inert fill reduced over recent years during the recession and as increasing volumes of construction and demolition waste have been recycled. However there is now a growing demand for facilities for excavation waste, typically clays and chalk that are not suitable for recycling. The quarry presently disposes of

approximately 100,000 tonnes of inert fill per year. There is a strong local demand for inert fill from development sites in south Buckinghamshire and West London. The quarry is very well located with direct access from the A412 close to the A40/M40 to receive imported fill materials. The company has identified that demand for inert landfills is currently increasing and predicts that demand will increase in future years, particularly if other receiving sites, including non-quarry sites, close.

Landscape

A full Landscape and Visual Impact Assessment (LVIA) has been carried out and is included in the Environmental Statement. The site does not lie within any protected landscape designation, but is subject to the South Bucks District Landscape Character Assessment. The site falls within the Colne Valley landscape character type. The main characteristics of this area are a flat wide floodplain with little height variation dominated by rough grazing and pasture interspersed with arable fields and paddocks. The tree cover is sparse. Gravel extraction has shaped the landscape with former gravel pits restored to lakes. Transport corridors including the M40 have a strong visual and audible influence. The impact on the landscape character is assessed as slight during the operational life of the quarry, and slightly beneficial following restoration.

The LVIA includes a detailed assessment of the visual impact of the proposals from residential properties, commercial properties, footpaths and roads in the proximity of the site. The quarry extension will have a visual impact within the area, but with mitigation in the form of screen bunding this can be reduced. The visual effect from the nearest properties in Knighton Way Lane, Brickfield Cottage and 99 Oxford Road is moderate. The site can be viewed from a footbridge over the A40/M40 roundabout at the northern end of the site. The effect from here is also considered moderate. The greatest visual effect is from Footpath 25 that crosses the application site between the proposed extension and the plant site. However the impact is transitory and can be mitigated by screen bunding. Otherwise the visual effects are assessed as having less impact – e.g. slight or neutral.

A number of mitigation measures are already either present or occur naturally. This includes natural mitigation such as existing woodland and hedgerows which in this flat Colne Valley landscape restricts views into the application site. In addition screening bunds and tree planting also helps to mitigate adverse effects.

Visual impact is also mitigated by the progressive working and restoration scheme which minimises the operational area at any time. It is also proposed to restore the land to its existing agricultural use including the replacement of the woodland and hedgerows.

The visual effects are limited to a relatively restricted area around the site. In overall terms it is concluded that the proposals can be integrated into the local landscape without causing significant detriment to the landscape character, quality and visual amenity of the immediate locality.

Ecology

A detailed ecological assessment has been carried out and is included in the Environmental Statement (ES). The site itself is not subject to any international,

national or local designations. There are three Sites of Special Scientific Interest (SSSI) and two Local Nature Reserves within 2 km of the site. These are considered in the ES and will not be adversely affected.

Consideration has been given to the possible impact on bird strike in relation to London Heathrow and RAF Northolt. The restoration scheme does not include any water bodies. Whilst water areas and silt ponds will be formed during working these will be temporary and operational. The Bird Management Plan for the existing quarry will continue. Accordingly there will be no adverse effect on aviation safety.

The site does not contain any nationally scarce plants or plants scarce in Buckinghamshire. The only habitat present is the dead wood within the woodland block (the Clump). Some of the woodland will be retained and will be a receptor for dead wood from felling. Quarry operations frequently provide temporary habitat for specialised species of invertebrates and colonisation by species currently present at other quarry sites may take place.

A number of species surveys have been carried out:

- No reptiles or amphibians are believed to breed on site.
- No specially protected bird species are considered to breed within the application area.
- No otters or water voles were found. The increase flow in Rusholt brook after restoration may encourage habitation by water voles.
- A badger sett within The Clump near the eastern boundary will be retained with an appropriate stand-off. The position regarding outlier setts will be reviewed in advance of working Phase 4 and a decision made whether to retain or relocate if they are still active.
- A single brown long-eared bat roost within a tree alongside Rusholt Brook and will be retained.

An additional invertebrate assessment is being undertaken at the request of Bucks CC with interest likely to be limited to the dead wood with The Clump.

The mineral extraction will involve the loss of existing grassland, woodland and hedgerows. However the restoration scheme provides for the restoration of the site to the same use including replacement woodland and trees etc. Ecological enhancements are included in the restoration details.

The quarry extension will not have any significant ecological effects. Overall the proposals upon restoration are likely to have a beneficial effect on the ecology of the area.

Local amenity (noise, dust and visual)

Any impact on local residents is principally due to the proximity of workings to housing, but also relates to the relationship of the site to local rights of way and any other public access. There are a number of commercial premises in the area including KFC and Smiths Garden Centre and the impact on these uses has also been considered.

Loss of amenity can be caused by noise, dust and visual impact. The main method of mitigating such loss of amenity is the provision of buffer zones between the workings and any nearby residential properties and other sensitive land uses. The design of the buffer zones follows the advice of the project noise consultants to ensure the predicted noise levels are acceptable and within the national noise guidelines. Impact on amenity is also minimised by restricting the operational hours to normal working hours (as described in the project description) and other operational measures.

Buffer zones have been incorporated into the scheme to protect the amenities of Brickfield Cottage and Ivy House Farm. The buffer zones incorporate screen bunding that also extends along the Oxford Road boundary (A4020) to protect the amenities of houses along the opposite site of this road. Additional bunding is also proposed along the eastern site boundary to strengthen the mitigation for the main built up area of New Denham which lies 150 - 200 metres to the east. The proposals include the retention of the minerals processing plant and concrete batching plant. The nearest property to this area is Southlands manor. The impact on Southlands Manor will not change.

A noise assessment has been carried out and is included in the Environmental Statement. The noise consultants have advised on the quarry since it opened and have considerable background information and knowledge of the site. The assessment has involved additional noise measurements at five representative locations – Southlands manor, Quarry Cottages, Moat Place, Ivy House Farm and Brickfield Cottage. Noise levels were generally controlled by road traffic noise, birdsong and local vehicle movements.

Site noise calculations have been undertaken for nine locations, taken to be representative of the nearest noise sensitive premises. The additional four locations are Southlands manor Lodge, Knighton Way lane, new House farm and The Bungalow. The suggested noise limits for these locations are:

55dB $L_{Aeq\ 1hr}$ for routine operations
70dB $L_{Aeq\ 1hr}$ for temporary operations such as soil stripping.

These limits are in with the requirements of National Planning Practice Guidance and are suggested as appropriate for inclusion in any planning conditions, as for the current quarry workings.

Regarding dust, the extraction of sand and gravel is 'wet' (ie without dewatering) and is removed for processing by conveyors. Therefore it is not an intrinsically dusty activity. The importation and placement of fill materials and the replacement of soils can generate dust, but simple practicable measures can be adopted to mitigate dust emission, such as avoiding very windy conditions and damping haulage routes.

Screen bunds proposed on the perimeter of the northern extension area principally for noise and visual mitigation will also mitigate dust. In addition trees and hedgerows around the site will be retained and vegetation within the site retained until required for extraction.

A dust assessment was undertaken as part of the Environmental Statement at the time the planning application for the quarry was submitted in January 2006. Planning permission was subsequently granted in March 2007 subject to planning conditions

requiring, inter alia, the submission of schemes for the monitoring and mitigation of dust. These were submitted and subsequently approved. Since the quarry commenced working during 2008 there have been no significant complaints or issues raised concerning dust. The approved mitigation scheme will be applied to the extension area.

A new air quality and dust assessment has been undertaken in relation to the northern quarry extension and is included in the Environmental Statement. The scope of the assessment has been agreed with the Environmental Health Officer (South Bucks District Council) and focusses on dust. The prevailing wind direction is towards the north east towards Oxford Road. The assessment considers the possible impact of dust on properties around the site including residential properties in Oxford Road and Knighton Way Lane, and local businesses. The dust impact during normal quarrying operations is assessed to be medium – low at a small number of locations when working is at its closest point. The dust impact will be greater during temporary operations including soil stripping and bund construction, but is for a relatively short period of time.

An assessment of PM₁₀ (very small particles) has also been undertaken. Since the site is near to the M40 corridor which is an Air Quality Management Area (AQMA). The present background PM₁₀ levels are about 50% of the National Air Quality Objective level and the proposed quarry extension would have no material impact on these levels.

The proposed extension would be subject to the existing Dust Management Plan for the quarry which sets out the detailed measures to manage and mitigate dust (included in the Environmental Statement dust report). Dust will continue to be monitored and a new monitoring point will be established on the boundary of the northern extension area.

Existing views into the site are principally mitigated by the provision of landscape bunds. These have been positioned on the boundary of the extraction area with an intervening buffer area of open ground to the nearest residential properties. The heights of the bunds has also been generally limited to three metres to minimise their visual impact. The bunds will also be seeded with grass.

In conclusion, the proposals will have no adverse impact on the amenities of local residents given the mitigation measures proposed, and regulation through planning conditions.

Footpaths

The only right of way affected is Footpath 25 that lies along the southern boundary of the extension area between it and the quarry plant site. The view over the extension are partially restricted by a hedgerow, but is open to the east of Rusholt Brook. A low bund is proposed to restrict views from this section of path. Views of the plant site will not change. The footpath is crossed by the quarry haul road by a gated crossing point and this arrangement will not change. An additional haul road crossing and a conveyor crossing are proposed, but these will not significantly impede users of the path. In addition to the visual impact there is also potential impact due to noise and dust. Users of the path should therefore be to be aware of the quarry operations, but any impact is considered to be slight as walkers pass through the quarry site.

Surface and Groundwater including Flood Risk Assessment

A detailed hydrogeological and hydrological assessment has been carried out including a Flood Risk Assessment (FRA). The work has been undertaken by SLR Consulting Ltd who have been involved in Denham Quarry from the beginning and therefore have a very good understanding of the surface and groundwater conditions. In addition they have considered groundwater quality and any effects on nearby protected habitats.

Rusholt Brook crosses the application site, flowing in a southerly direction within a well defined channel. It is classified as a 'Main River' by the Environment Agency. It flows into the River Colne to the south of Denham Quarry. It is not proposed to alter the existing alignment of Rusholt Brook through the proposed workings, and it will be protected by buffer strips on either bank for maintenance purposes. The workings will also be 'wet' i.e. without any dewatering, and therefore there will be no significant effects on Rusholt Brook during working.

The site will be progressively backfilled to original ground levels with inert material. There is a potential that overall surface water runoff rates will be slightly increased as a result of the low permeability infill material. This has been assessed to be a potential minor increase. A surface water drainage scheme has been provided to ensure that runoff rates into the Rusholt Brook are not increased above pre-development conditions.

The site is permanently dry and in agricultural use as grazing. The groundwater lies within the underlying sand and gravel between c.0.4 metre and c.2.8 metres below ground level. Monitoring shows that the dominant groundwater flow direction is southerly. The sand and gravel will be worked 'wet' and there will therefore be no significant effects on groundwater levels during extraction. There is the potential for any damming of groundwater flow to increase levels to the north and west of the site. However this will be prevented by the installation of groundwater drains along the north-eastern and north-western site boundaries. The bases of these drains will be connected to the underlying gravel aquifer so that groundwater can flow up into these drains from below should groundwater levels be raised. The drains will be connected to Rusholt Brook. In terms of encouraging the ecology of Rusholt Brook any increase in flow is likely to be beneficial. There will be no significant impact on water dependent habitats at Kingscup SSSI.

Regarding flood risk the site is located entirely within Flood Zone 1 where there is a low risk of flooding from surface and groundwater sources. Sand and gravel extraction is entirely appropriate in Flood Zone 1. A Sustainable Drainage Strategy (SuDS) is proposed to control surface water runoff from the backfilled and restored land. The proposed drainage will discharge surface water runoff from much of the site to groundwater.

The application site is not within a groundwater Source Protection Zone (SPZ). Groundwater and surface water quality at the application site is currently monitored and there are no indications of any significant impacts of quarrying on groundwater quality, other than that probably associated with road salting on the A412. Current measures to mitigate the risk to groundwater quality at the quarry will be continued –

for example regarding the staff welfare facilities, plant fuelling arrangements and infill materials.

The proposed extraction and inert infilling in the extension area would follow the same approach as under the current extraction methods and would involve wet working with no dewatering. It is concluded that with adoption of the existing mitigation measures used at site and those identified with this report that there would be no significant impact of ground or surface waters.

Archaeology

A full assessment of the site archaeology and wider cultural heritage has been carried out. The work has been undertaken by Wessex Archaeology who have been involved in Denham Quarry since the beginning and therefore have extensive knowledge of the existing quarry and its context.

The archaeological and cultural background is considered below in the different archaeological periods:

(i) Palaeolithic and Mesolithic (older than 4000BC)

Evidence for early pre-historic activity has been recorded in the gravel terraces of the River Colne with a number of significant sites recorded. Previous investigations at Denham Quarry identified two gravel islands showing Late Glacial and Early Post-glacial activity concentrated on these islands in the floodplain. At least six *in-situ* flint scatters were identified in the previous work and have been investigated. One scatter has been dated to 9,300 BP (before Present).

(ii) Neolithic and Bronze Age (4000 – 700BC)

Artefacts from this period have been found in the area and recovered during test pitting in the existing quarry. A number of Late Bronze Age features, possibly settlement activity, were also identified in the existing quarry close to Rusholt Brook consisting of ditches, pits/potholes, a hearth and possible quarry pit.

(iii) Iron Age and Romano-British (700BC – AD410).

Two ditches containing pottery from this period were found in the present quarry plant site area.

(iv) Saxon and Medieval (AD410 – 1500)

Medieval pottery and roof tile has been recovered from the existing quarry. Place name evidence within the Colne Valley is indicative of Saxon settlement. Denham ‘village in a valley’ is recorded in the Domesday Survey as a settlement of 18 households and three mills.

(v) Post-medieval and Modern (AD1500 – Present Day)

Oxford Road (A4020) was a former turnpike with two 18th Century milestones near to the site boundary. Field boundaries date from the late medieval period onwards. The cultural heritage is reflected in the designation of Conservation Areas and Listed Buildings in the wider area.

A number of investigations have been carried out as part of the assessment and are included in the Environmental Statement:

- Historic Environment Desk Based Assessment (DBA)

The DBA confirms that there are no designated heritage assets within the site. Within the wider area considered lie a number of Listed Buildings (one Grade II*) and two Conservation Areas ((Uxbridge Lock and Denham Village). Denham Newtown, now New Denham, was a planned development constructed in the 1870's. Due to the screening effect of intervening development and vegetation the application site does not share intervisibility with any of these heritage assets. Therefore the site does not constitute or contribute to their visual settings and the development would not result in any adverse impacts in this regard. Potential impacts due to dust and noise were also considered but not concluded to have an adverse impact.

The assessment has established that there is an archaeological interest in the site. This is defined as the potential for the presence of buried archaeological remains, in particular relating to prehistoric, Romano-British and post-medieval activity. In particular there is potential for Palaeolithic and Mesolithic remains within a low lying gravel island identified in the south western area of the site (near to the quarry entrance).

- Geophysical Survey

A detailed gradiometer survey was carried out for the additional northern extraction area in September 2015. The purpose of the survey was to identify any magnetic responses that might represent buried archaeological features and guide subsequent fieldwork. The survey has demonstrated the presence of anomalies that may indicate archaeological activity and merit further investigation.

- Archaeological Evaluation

This evaluation involved the digging of 34 shallow archaeological trial trenches during November and December 2015. These represented 4% of the survey area which is the norm for evaluating mineral working sites. The trenches are located in the western area of the site (within proposed Phases 1 & 2). The remainder of the area will be investigated when access to the land is possible following the grant of planning permission. The work did not identify any significant evidence for pre-medieval archaeology. Five shallow ditches were identified and appear to form part of a wider medieval and/or post-medieval field system, but contained little dateable material.

- Geoarchaeological Deposit Modelling

The aim of the study was to model the upper surface of the sand and gravel deposit to indicate where archaeological assets may most likely occur. No deposits with a high potential were shown within the available data, although some areas of moderate potential have been identified, including a shallow gravel island which may have been the focus of early prehistoric activity.

Archaeological trenching has only been carried out on part of the site due to accessibility constraints. The complete distribution and presence of any remains cannot currently be confirmed on the basis of available information. The remaining areas will need to be investigated by both additional trenching and geoarchaeological assessment to confirm a suitable mitigation strategy with Bucks County Council. This work can be secured by planning condition as agreed with the County Archaeologist. The strategy will involve further evaluation of areas which were previously inaccessible, areas of excavation, strip, map and record and/or watching brief depending on the significance of the archaeological resource identified.

Other Issues

(i) Traffic

New Denham quarry has an excellent access to the strategic highways network directly onto the A412 via a newly constructed roundabout. It has been designed to accommodate high volumes of lorry movements generated by sand and gravel extraction, concrete manufacture and the importation of restoration fill material. It is fit for purpose to cater for the traffic generated by the proposed quarry extension until 2026 (2028 if the HOAC Scheme progresses).

The quarrying planning permission limits the maximum number of daily lorry movements to 296. The site is generally operating well within this limit. The proposals will not change the present pattern of HGV movements that will continue to fluctuate to reflect the demand for aggregates and concrete, and the availability of restoration fill materials.

An assessment carried out in connection with the HOAC Scheme shows that the quarry access has capacity for up to 500HGV movements per day.

(ii) Soils

An Agricultural Land Classification Survey (ALC) was carried out by the then Ministry of Agriculture Fisheries and Food (MAFF) in 1990 in connection with the preparation of mineral planning policies by Buckinghamshire County Council. It is unlikely that the soil characteristics will have changed since 1990, particularly since the land has remained under the same ownership (Bucks County Council Smallholdings) and same use. The MAFF survey is therefore valid and included with the soils assessment in the Environmental Statement.

The ALC Report covers an area of some 94Ha including the existing quarry site. This is an area containing land classified as Grade 2, Grade 3a and Grade 3b. Land classified as Grades 2 and 3a is the 'best and most versatile land.' The land to the north of Footpath 25, excluding the woodland, comprises approximately:

52% Grade 2 land,
31% Grade 3a
17% Grade 3b

Over 80% of the land to be worked therefore comprises the best and most versatile agricultural land. Accordingly soil handling procedures will be adopted to preserve the quality of the soils for site restoration.

There appear to be no policies relating to the development of the best and most versatile agricultural land in the Minerals and Waste Core Strategy or the Minerals and Waste Local Plan. Policy 26 of the MWLP has not been saved, but it sought to prevent the permanent loss of such land unless there were no alternatives. In this case it is proposed to restore the land to agriculture using techniques to bring it back to a high standard. There will therefore be no permanent loss of high grade land. National guidance does not specifically relate to these circumstances and the application should therefore be considered on its merits.

(iii) Green Belt

The quarry lies within the Green Belt. However mineral working and restoration is appropriate development in the Green Belt and not contrary to planning policy (see Policy CS 20 of the M&W Core Strategy). The proposed quarry extension will not materially change the impact of the workings on the openness of the Green Belt. The plant site and concrete batching plant will remain and have a further impact on openness for a number of years, but remain temporary.

(iv) Trees

A detailed tree survey has been carried out to identify the quantity and quality of woodland, trees and hedgerows within the application site, and to inform the ecological assessment. The trees are of variable age and condition and quality. In overall terms the removal of trees for extraction is considered acceptable, with trees retained and protected where possible. Significant re-planting is proposed in the restoration scheme. The tree survey is included at **Appendix 2**

5. CONCLUSIONS

The application site is not within a Preferred Area for sand and gravel extraction. However the Minerals Local Plan that identifies Preferred Area, adopted in 2006, is now significantly out of date and the replacement Minerals Plan is also seriously delayed. The application site has been nominated for inclusion in the forthcoming replacement Minerals Plan and has been highly ranked in a comparative assessment of potential sites. However the proposal falls to be considered in the policy framework provided by the Minerals and Waste Core Strategy and National Policy and Guidance.

The Core Strategy sets out the criteria against which planning applications will be assessed. Significantly the policy gives priority to the extension of existing quarries. The proposal complies with this and the other criteria.

The present County landbank for sand and gravel is above the minimum requirement of seven years. However the National Guidance makes it clear there is no maximum landbank and that applications should be considered on their own merits. There is a need to permit the proposed northern extension to New Denham Quarry to maintain the high volume supply of high quality aggregates into the local construction market, including for use in making concrete. A number of other unallocated sites have been granted permission in order to maintain supply in advance of the new Minerals Local Plan. The proposal will therefore not create a precedent.

A full assessment of the local impact of working has been carried out including detailed assessment of landscape, the water environment, ecology, noise, dust soils and archaeology. The scheme has been designed to mitigate any adverse impacts based on advice from the consultant team, including the provision of buffer zones. There will be no material adverse impact on local amenities or the local environment, subject to appropriate mitigation and regulation by planning conditions.

The application complies with planning policy and therefore merits the support of the planning authority.