

# **Mineral Extraction and Restoration to Open Water and Marginal Planting**

**Eastern Extension to New Denham Quarry, Denham  
Road, Denham, Buckinghamshire**

**Planning Application by Summerleaze Ltd**

**Planning Statement**

**December 2022**

**GMKC Ltd**

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### Drawings:

<b>Location Plan</b>	<b>M12.162(n).D.001A</b>
<b>Existing Site Plan</b>	<b>M12.162(n).D.010</b>
<b>Extraction Design</b>	<b>M12.162(n).D.002C</b>
<b>Restoration</b>	<b>M12.162(n).D.003F</b>
<b>Cross Sections</b>	<b>M12.162(n).D011</b>

## **1. Introduction**

- 1.1. This Planning Statement is produced by GMKC Ltd on behalf of Summerleaze Ltd (the Applicant) to accompany a Planning Application for an eastern extension to New Denham Quarry.
- 1.2. New Denham Quarry is an active sand and gravel quarry located in south Buckinghamshire to the southwest of New Denham and due south of Junction 1 of the M40 motorway. The proposed extension area lies to the east of the existing quarry and immediately west of Knighton-Way Lane. It will enable viable mineral to be worked out and allow a continuation of supply following the working of the permitted northern extension area.
- 1.3. This Planning Statement, in conjunction with the Application Forms, Drawings and Environmental Assessments, comprise a Planning Application submitted to the Buckinghamshire Council (BC) as the Local Planning Authority (LPA).

## **2. Site Location and Description**

- 2.1. New Denham Quarry is located in the south of Buckinghamshire, to the southwest of New Denham and west of Uxbridge. It is accessed from the A412 Denham Road (drawing number M12.162(n).D.001). The quarry is bordered by a mix of agricultural land and urban areas. The River Alderbourne marks the southwestern boundary and the River Colne marks the south-eastern boundary of the quarry.
- 2.2. New Denham Quarry is a circa 90 hectare sand and gravel quarry with planning permission for mineral extraction and restoration to lakes, woodland, tussocky grassland, wildflower meadow and hedgerows. The original quarry, apart from the processing plant area, is worked out and mostly restored. An extension area to the north, permitted on 31<sup>st</sup> March 2017 under permission CM/23/16, is currently being worked, infilled and restored progressively.
- 2.3. The application site, measures circa 17ha and comprises an eastern extension area and the existing processing plant (installed in 2008), stocking area and conveyor, which will continue to serve the extension. The new area of extraction, which is located to the east of the main quarry and processing area, will be worked as one phase following the completion of extraction within the northern extension. It comprises circa 5ha of agricultural land, currently used for the grazing of horses, of which circa 3.85ha will be extracted. It is bordered to the east by Knighton-Way Lane, to the north by Public Right of Way 25, which runs between New Denham and Southlands Manor, and to the south by an electrical sub-station, agricultural land and Field Cottage.

- 2.4. The extension site is relatively flat, ranging between 31.0m and 33.0m AOD dip from north to south.
- 2.5. The quarry and application site form part of Buckinghamshire Council's smallholding estate. Summerlease Ltd have an option to lease the site for mineral extraction and restoration, as per the existing quarry.
- 2.6. The nearest residential receptors to the application site are those on Knighton-Way Lane, in New Denham, which lie circa 10m from the application boundary and 50m from the extraction boundary; and Field Cottage, which lies 127m to the south of the application site. Southlands Manor is located circa 56m to the west of the existing quarry and processing plant area, circa 439m to the west of the extension site. Other nearby properties include Brickfield Cottage, 48m to the north; Watergate Farm, 648m and Six Acre Farm, 517m to the south.
- 2.7. Local Listed Buildings include Southlands Manor and a Barn within its curtilage, both Grade II Listed, and the Dog and Duck Public House, circa 360m to the north-east. Nearby Conservation Areas (CAs) include Uxbridge Lock CA, Denham CA and Iver CA.
- 2.8. To the south of the extension site lies a National Grid substation with overhead power lines radiating out to the north across the site.
- 2.9. The Rusholt Brook runs north-west to south-east between the processing plant area and the eastern extension area.
- 2.10. Public footpath DEN/23/1 runs along the eastern boundary of the site; footpath DEN/22/1 runs along the north-east boundary; footpath DEN/25/1 runs along the northern boundary; and footpath DEN/24/1 runs along Knighton-Way-Lane perpendicular to the eastern site boundary and progressing north-east towards Oxford Road.
- 2.11. The existing quarry and extension area are located within the Metropolitan Green Belt and the Colne Valley Regional Park. The application site also lies within Flood Zone 1, which has the lowest risk of flooding from rivers and seas. The entire quarry is located within the Mineral Safeguarding Area, as designated within the Buckinghamshire Minerals and Waste Local Plan.
- 2.12. There are no European, national or local nature conservation designations covering the application site, although the Kingcup Meadows and Oldhouse Wood Site of Special Scientific Interest (SSSI) lies circa 570m to west of the extension site. Frays Farm Meadow SSSI and Fray's Valley Local Nature Reserve, which share a southwestern boundary are located 1.2km to the NE. A Local Wildlife Site is located to the west of Southlands Manor and The Lodge. Long Coppice, the River Colne at Water Gate Farm and the River Colne east of Denham Country Park are Biological Notification Sites (BNS).

- 2.13. The extension area will be served by the existing site processing plant, silt lagoons, offices, weighbridge and access onto the A412 Denham Road.

### **3. Planning History**

- 3.1. New Denham Quarry was granted planning permission for mineral extraction in 2007 under planning permission SBD/8201/06. Permission was granted in June 2011 for mineral working and restoration within the utilities corridor and buffer zone to Six Acre Farm (phases 3E and 4) under planning permission 11/01460/CM. An extension into the buffer zone for Field Cottage (Phase 4C) was granted under reference CM/32/14 in March 2014. The northern extension was granted in March 2017 under reference CM/23/16.
- 3.2. Planning application CM/22/16 for the extension of existing sand and gravel extraction and restoration for relocation of Hillingdon Outdoor Activity Centre (HOAC) at New Denham Quarry was granted in March 2017. Permission CM/22/16 permitted mineral extraction from the proposed eastern extension area, alongside other changes to the existing quarry to accommodate the relocation of HOAC from Dews Lane, South Harefield to New Denham Quarry due to anticipated significant impacts caused by the construction phase of HS2. Application CM/22/16 encompassed a much wider area, circa 70ha, including the entire quarry and the eastern extension area.
- 3.3. Planning permission CM/22/16 was not implemented and has now lapsed.

### **4. Proposed Development**

- 4.1. The proposed development involves the following key components, as defined on Location Plan drawing no. M12.162(n).D.001:
- Mineral extraction from the eastern extension area with restoration to a lake with grassland and tree planting.
  - Retention of the existing processing plant, stockpiling area, site offices, weighbridge, staff facilities and concrete batching plant.

#### Extension Area

- 4.2. This planning application seeks permission to extract circa 290,000 tonnes of sand and gravel from an extension area to the east of New Denham Quarry, with low level restoration to a lake, tussocky grassland, species rich meadow, hedgerows and broad-leaved woodland. The

- site will be worked as an extension to the existing quarry, with extraction works following the currently operational northern extension area and with mineral being processed within the existing processing plant.
- 4.3. It should be noted that planning permission was granted for mineral extraction within the extension site and the potential impacts assessed as part of planning application CM/22/16, approved in March 2017.
  - 4.4. As found within the main quarry and northern extension, the eastern extension contains sands and gravels of the Taplow Gravel Formation, which is between 2.3m and 5.6m thick. It is underlain by silty and sandy clays of the Lambeth Group, with occasional sand horizons and Chalk bedrock. The overlying topsoil thickness ranges from 0.2-0.6m and alluvium ranges from 0.6-1.2m thick.
  - 4.5. At current rates, it is anticipated that the extension area will be worked out within circa 12-18 months. The site will be worked as one phase (see Extraction Design drawing no. M12.162(n).D.002), likely from south to north, with rolling restoration being completed within circa 6 months following final extraction. Stripped soils will be placed around the perimeter of the site, namely to the east and north of the extension area, providing suitable soil storage and mitigation to neighbouring receptors. The site will be restored at a low level, using on-site soils and overburden.
  - 4.6. The mineral will be worked 'wet', i.e. no artificial lowering of the groundwater during mineral extraction is proposed. The as dug mineral will be transported via conveyor to the existing processing plant located to the west of the extension area. Here the sands and gravels will be washed and screened ready for sale off site.
  - 4.7. The site will be restored using site derived materials to a lake, surrounded by tussocky grassland and species-rich meadow, separated by hedgerows and woodland, as shown on Restoration drawing no. M12.126(n).D.003. There will be no importation of material for restoration purposes.
  - 4.8. The nearest residential properties are located to the immediate east on Knighton-Way Lane. A minimum 50m buffer will be provided between mineral extraction and the boundaries of the nearest residential properties. A soil storage bund will be constructed along the eastern boundary of the site, which will provide mitigation from potential visual, noise and air quality impacts. Where this bund tapers around the overhead electricity pylon located on the eastern boundary of the site and allows for the existing hedgerow to be retained and protected, the 'gap' in the bund will be infilled with a suitable mitigation barrier, such as straw bales, which

can be used temporarily to mitigate potential amenity impacts, constructed safely below the electricity cables and placed close to the hedgerow.

#### Retention of the Existing Processing Plant and Stocking Area

- 4.9. As stated above, the existing processing and stocking area, concrete plant, site offices, weighbridge and staff facilities, will be retained in their existing location in order to support the proposed development within the eastern extension area. The remaining mineral in this part of the site, referenced as phase 5 in the northern extension area permission (permission CM/23/16), was proposed to be worked out following completion of the northern extension area, with all plant and machinery being removed and the land restored by 31<sup>st</sup> December 2026 (permission CM/23/16).
- 4.10. The processing area will be the final phase to be worked, infilled and restored. Therefore, if this application is approved, this will take place following final extraction and processing of the mineral from within the eastern extension area. It is anticipated that final restoration will be completed by the end of 2028.
- 4.11. It should be noted that there will be no changes to the land use, the approved development of the existing quarry plant site, or its restoration, other than to extend its duration to support the proposed extension.

#### Operational Hours

- 4.12. The extension area will be worked during the following working hours, which are slightly reduced compared to the existing quarry due to the closer proximity to residents:

0800 to 1800 Monday to Friday,

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

#### Access and Traffic

- 4.13. The extension area will be served by the processing plant, stockpiling area, silt lagoons, offices and site access within the existing quarry. The existing quarry access via a roundabout onto the A412 Denham Road will be used to support the proposed extension, with the number and pattern of vehicle movements remaining the same throughout. HGV movements fluctuate on a daily basis, however they will remain within the permitted daily limit of 296 HGV movements per day (148 in, 148 out).



### Ecology

- 4.14. This application is accompanied by an Ecological Assessment, carried out by Ward Associates. A desk-based assessment and field survey were undertaken to establish the ecological context, habitats on site and the potential for protected species. The assessment identifies that the habitats that will be directly affected by the development are of low ecological value and that all plants recorded are common/widespread species, with no rare or scarce plant species found. The hedgerows are of low species composition and none qualify as ecological important under the Hedgerow Regulations 1997. There are no trees scheduled for removal and a bat survey was carried out upon request from the County Ecologist, which showed low usage. Potential commuting routes will remain.
- 4.15. Whilst the development will result in a loss of 3.85ha of semi-improved grazed grassland, used as pony paddocks, the proposed restoration will create 0.77ha of species-rich meadow, 0.47ha of tussocky grassland, 0.82ha of deciduous woodland and a lake (3.04ha) with fringe reedbed. A loss of 284 metres of species-poor hedge will be replaced with 549m of species-rich hedge with oak as the dominant tree. The combined positive effect of the biodiversity enhancement features created upon restoration of the site provides a biodiversity net gain of 109.43% for hedges and 77.84% for other habitats.

### Noise

- 4.16. A Noise Assessment has been carried out by WBM Ltd, Acoustic Consultants, which supports this application. The assessment concludes that the proposed development can be carried out within the existing approved noise limits for the site, as per condition 22 attached to the HOAC planning permission reference CM/22/16 and the existing planning permission for the northern extension, reference CM/23/16, namely:

55dB LAeq, 1 hour, freefield at the nearest noise sensitive properties for normal operations  
70dB LAeq, 1 hour, freefield for temporary operations.

- 4.17. The Noise Assessment considers cumulative impacts, including with the infilling and restoration of the northern extension area alongside working of the eastern extension. The designed in mitigation measures, including perimeter soil storage bunds, use of modern plant and equipment, plant locations and limited hours of operation, will ensure that noise levels are adequately managed. The assessment concludes that the site can be worked whilst keeping noise emissions to within environmentally acceptable limits.

Air Quality

- 4.18. This application is accompanied by a Dust and Air Quality Assessment carried out by DustScan AQ. This makes an assessment of the likely air quality impacts associated with the proposed development upon the nearest sensitive receptors. The assessment identifies that Moderate Adverse Effects may be experienced by the nearest residential receptors to the east of the site, in Knighton-Way Lane, during the short-term temporary operations including soil stripping and bund formation. These operations are temporary and involve the construction of soils storage bunds, which provide amenity mitigation for the operational period of the development.
- 4.19. DustScan identify that current mitigation measures are applied effectively, although it is recommended that the Dust Management Scheme is updated and that one of the existing dust monitors is relocated to the eastern edge of the site to provide ongoing monitoring of dust levels throughout the development towards the nearest receptors in Knighton-Way Lane.

Hydrology and Hydrogeology

- 4.20. This application is accompanied by a Water Environment Impact Appraisal and Flood Risk Assessment (FRA), prepared by SLR Consulting.
- 4.21. Under the development types defined within Planning Practice Guidance (PPG) and Annex 3 of NPPF this development is considered as a “*Sand and gravel working*”, which is defined as a ‘*water compatible*’ development type. According to EA Flood Mapping, the site lies within Flood Zone 1, which has the lowest risk of flooding (land which could be at risk of flooding from fluvial or tidal flood events with less than 0.1% annual probability of occurrence). The Taplow Gravels are classified by the EA as a Secondary A aquifer.
- 4.22. The FRA concludes that the proposed extraction of sand and gravel from New Denham Quarry will not be subject to undue levels of flood risk and will not result in any short or long-term adverse impacts on flooding locally.
- 4.23. The appraisal concludes that there will be no significant impacts on groundwater levels within the immediate vicinity of the application site, as the sand and gravels will be worked ‘wet’ there will be no dewatering and associated drawdown. It concludes that the proposed development will not have a significant impact upon groundwater levels or flows within the Rusholt Brook during the operational or restoration phase.

4.24. Subject to recommended best practice techniques for groundwater quality mitigation measures, the appraisal concludes that the proposed development will not have a significant effect on the water environment.

Landscape and Visual Impact

4.25. This application is accompanied by a Landscape and Visual Impact Assessment (LVIA) prepared by Pleydell Smithyman Limited.

4.26. The site is predominantly agricultural land used for grazing. It is divided into 5 paddocks, with fencing or hedgerows running east-west and a broken hedgerow with interspersed trees around the site perimeter. The boundary planting will be retained and enhanced where necessary. However, the broken hedgerow which transects the southern part of the site will be removed. This is of very poor quality.

4.27. The operational phase of the development has been designed to minimise impacts to the landscape and minimise visual impacts by way of:

- Locating the new vehicle access and the conveyor route with minimal disturbance to Rusholt Brook and without cutting through the existing planted screening bund;
- Provision of two screening bunds to minimise visual intrusion to nearby properties on Knighton Way Lane;
- Provision of an 8m standoff to protect Rusholt Brook; and
- Standoff to PROW and erection of soil storage bunds to minimise amenity impacts.

4.28. The restoration scheme is designed to enhance the immediate landscape and to integrate the Site both physically and aesthetically to the wider area by transforming the eastern area into a nature conservation area with amenity lake, broad-leaved woodland planting, restoration of grassland planting with appropriate mix, planting of tall tussocky grass along the lake margin, planting of new hedgerows and enhancing existing hedgerows.

4.29. The LVIA concludes that the effects of the development upon local landscape features, landscape character and wider landscape value would be moderate to minor or minor during the operational phase, which is not significant. Upon restoration this becomes moderate beneficial or neutral.

4.30. Visual impacts associated with the development will comprise views from nearby residential receptors on Knighton Way Lane, which will be limited to first floor windows, as ground floor views will be mitigated by existing planting and proposed soil bunding along the eastern

boundary. Limited views will be afforded of the development from PROW DEN/25/1, which runs east-west along the northern boundary of the site. These will be limited by boundary planting, the construction of a soil storage bund and will be transitory in nature.

- 4.31. Any effects to PROW and residential receptors would be temporary, short term, partially mitigated, moderate adverse, becoming moderate beneficial upon restoration.
- 4.32. The nearest residents in Knighton-Way Lane would experience temporary, short-term, partially mitigated major to moderate effects during the operational phase, becoming moderate beneficial upon restoration.
- 4.33. In conclusion, it is assessed that the Proposed Development could be accommodated in the landscape with relatively modest and localised adverse landscape and visual effects during the operational phase. The Proposed Development would fully comply with relevant planning policy, and mitigation measures would minimise the impact upon landscape character, individual landscape elements and upon visual amenity.

#### Archaeology

- 4.34. The application is also accompanied by a Heritage Impact Assessment, which concludes that there is moderate potential for archaeological remains to be found on site, albeit as the site has been worked for agriculture over a long period, it is likely that any archaeological features would be degraded to some extent. Given this moderate potential, it is suggested that a strip, map and record exercise is undertaken as a watching brief during soil stripping operations.

#### Restoration

- 4.35. Upon completion of mineral extraction the site will be restored using indigenous materials, including the soils which were stripped prior to the works and safely stored in perimeter bunds. Restoration of the site will be to a lower level than the existing ground levels and to nature conservation use, including a lake, tussocky grassland, species rich meadow, hedgerows and broad-leaved woodland.
- 4.36. The restoration scheme takes into account the UK and Buckinghamshire Biodiversity Action Plan objectives and the potential to attract rare or declining species; to mitigate against or compensate for the effects of any impacts as far as possible; to enhance the value of habitats; and with regard to birdstrike concerns of nearby RAF Northolt and Heathrow Airport. A Bird Management Agreement (BMA) is in place for the existing quarry, this sets out how the restoration scheme will be implemented and maintained and how bird types and numbers will

be suitably controlled to reduce birdstrike risks. The BMA will be extended to cover the proposed extension site.

- 4.37. The restoration of the site will ensure that Biodiversity Net Gain is achieved, but replacing any disturbed habitats, including heavily grazed grassland and poor quality, gappy hedgerows. The final restoration scheme provides for improvements by introducing 0.47ha of tussocky grassland around the lake margins, 0.77ha of wildflower meadow, 549m of replacement hedgerows, 0.82ha of woodland and 3.04ha of lake. According to the Defra Biodiversity Calculator v3.1, this will provide on-site Biodiversity Net Gain of 77.84% in habitat units and 109.43% in hedgerow units. As such, this far exceeds the minimum requirement as set out in the Environment Act 2021.

## **5. Planning Policy**

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act states that applications for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.2. The Development Plan for the application site comprises the following document:
- Buckinghamshire Minerals and Waste Local Plan 2016 – 2036 (MWLP), Adopted July 2019
  - South Bucks District Local Plan
  - South Bucks Local Development Framework Core Strategy Development Plan Document, adopted February 2011
- 5.3. Other documents which are considered to be material to the consideration of the proposed development are:
- National Planning Policy framework (NPPF)
  - Planning Practice Guidance (PPG)
- 5.4. Buckinghamshire Council are working on a new Buckinghamshire wide Local Plan which is proposed to be in place in April 2025. The plan is at the evidence gathering stage and therefore carries no policy weight at this time.

### Sustainable Development

- 5.5. According to the NPPF the *“purpose of the planning system is to contribute to the achievement of sustainable development”* (paragraph 7), which means meeting the needs of the present, without compromising the needs of future generations. The three interdependent overarching objectives of sustainable development, that need to be pursued in mutually supportive ways, are:
- *Economic*– to help build a strong, responsive and competitive economy;
  - *Social* – to support strong, vibrant and healthy communities; and
  - *Environmental* – to contribute to protecting and enhancing our natural, built and historic environment.
- 5.6. As addressed below, the proposed development meets the three objectives of sustainable development through ensuring there is an adequate and steady supply of mineral to support economic growth, thereby meeting the demand for housing and infrastructure in the local area; protecting jobs; and providing high quality restoration with long-term biodiversity benefits.
- 5.7. This principle is reflected in the Buckinghamshire Minerals and Waste Local Plan (MWLP), for example Strategic Objective SO1, which states that *“for minerals development this means: identifying sufficient land to enable Buckinghamshire’s adopted provision rate for sand and gravel to be maintained so as to plan for a steady and adequate supply.”*
- 5.8. Strategic Objective SO2 refers to the safeguarding of mineral resources by defining Minerals Safeguarding Areas, within which the application site is located.

### Mineral Need

- 5.9. Minerals are an essential and finite resource, as recognised within the NPPF (Chapter 17, Paragraph 209):
- “It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite resource, and can only be worked where they are found, it is important to make best use of them to secure their long- term conservation”.*
- 5.10. Accordingly, at paragraph 211, the NPPF states that, when determining planning applications, *“great weight should be given to the benefits of mineral extraction, including to the economy”.* Paragraph 213 of the NPPF goes further in requiring that Mineral Planning Authorities (MPAs)

- plan for a “*steady and adequate supply of aggregates*” by preparing an annual Local Aggregate Assessment (LAA) and maintaining landbanks of at least 7 years for sand and gravel.
- 5.11. The landbank requirement is a minimum requirement to indicate when reserves are becoming scarce. Importantly, there is no maximum landbank.
- 5.12. The detailed policy context for the provision of aggregate mineral workings in Buckinghamshire is set out in policies in the Buckinghamshire Minerals and Waste Local Plan (MWLP).
- 5.13. Policy 1 reflects the NPPF in setting out that “minerals are a finite natural resource” and sets out Mineral Safeguarding Areas (MSAs), designed to prevent needless sterilisation of minerals by non-mineral development. It goes on to say that mineral resources of local and national importance include the sand and gravel deposits of the Thames Valley, in the south of the County, within which the development site is location. Mineral development is further supported in this area within Policy 2: Spatial Strategy for Minerals Development.
- 5.14. Policy 3 of the MWLP sets out sand and gravel provision to be made over the Plan period (2016 to 2036) for the extraction of 0.81 million tonnes of sand and gravel per annum from the Thames and Colne Valley.
- 5.15. The latest Local Aggregate Assessment (LAA) published by Buckinghamshire County Council (as they were) in October 2019, provided a provision rate of 0.82Mt per annum, slightly higher than that set out in Policy 3 of the MWLP. The permitted reserves at the end of 2018 were 10.65Mt, which at that time provided a landbank of 13.04 years. This was comfortably in excess of the 7-year minimum, required to ensure a steady and adequate supply, indicating that there was not an urgent need for additional reserves in 2019. If the reserves have depleted at the same rate, in 2022 the reserve would now have fallen below 10 years.
- 5.16. However, due to the completion and closer of other local mineral sites and an increase in sales during recent years, the permitted reserves have declined at a faster rate than predicted in the 2019 LAA. At the end of 2021 the landbank had reduced to just 6.2 years worth of aggregate reserve, thereby demonstrating an urgent need for additional reserves to be permitted.
- 5.17. The Planning Practice Guidance (PPG) makes it clear that landbanks are a monitoring tool to provide MPAs with an early warning of possible disruption to an adequate and steady supply of aggregates and that they should be used as an indicator for when additional mineral reserves are urgently required. Paragraph 84 states “*There is no maximum landbank level and each application for minerals extraction must be consideration on its own merits regardless of*

*the length of the landbank. However, where a landbank is below the minimum level this may be seen as a strong indicator of urgent need.*” Therefore, having a landbank above the minimum level should not be a reason to refuse planning permission. A landbank below the minimum 7 year requirement is certainly an indicator of an urgent need for additional reserves.

- 5.18. The sand and gravel provision in Buckinghamshire is expected to come from sites with planning permission, extensions to existing sites and from new sites in line with the spatial strategy for mineral extraction. This site is not only an extension to an existing quarry but is also an allocated site listed within Policy 4 of the MWLP. The mineral from this site was permitted to be extracted prior to the restoration of the wider quarry site for the purposes of creating an outdoor activity centre to be relocated that based at Hillingdon, which was due to be displaced as part of the HS2 development (see planning permission CM/22/16), as such this reserve is already included within that set out in the 2019 LAA.
- 5.19. Since the 2019 LAA several mineral sites have closed, this leaves fewer sites to deliver the same annual provision, most with restrictions on output. It is therefore essential that further reserves are permitted, from both new and extension sites, to ensure that an adequate and steady supply can be maintained. The requirement for an “adequate” supply requires that the landbank isn’t tied up in a limited number of sites, as this can stifle competition and limit daily output and therefore the ability to meet the supply needs. The extension area would enable the continued operation of New Denham Quarry as the permitted reserves in the northern extension are exhausted. The rate of extraction, processing rate and HGV movements would remain unchanged.
- 5.20. Major infrastructure projects, such as High-Speed Rail HS2 and East West Rail, have and will continue to increase future aggregate demand. It is recognised within the LAA that additional reserves will be required over the Plan period (to 2036), this is reflected within the increase in sales figures over the last three years.
- 5.21. This development will add to the permitted reserves and landbank and therefore assist Buckinghamshire Council meet their provisional requirements as set out in the LAA.

#### Green Belt

- 5.22. The National Planning Policy Framework (NPPF) attaches great importance to Green Belts, stating that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence.”*



- 5.23. The NPPF states that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”* It places *“substantial weight”* to any harm to the Green Belt, stating that *“very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*
- 5.24. Paragraph 150 lists mineral extraction as a form of development that is not inappropriate *“provided they preserve its openness and do not conflict with the purposes of including land within it.”*
- 5.25. Policy 21 of the MWLP states that *“the openness and characteristics of the Green Belt are to be protected, with minerals and waste development enhancing the beneficial use of the Green Belt (where possible) through...retention and enhancement of landscapes, visual amenity and biodiversity...”*. The extension site will be worked within circa 18 months, making the development short-term temporary. Whilst there may be a short-term impact upon the landscape and visual amenity of the site, during the operational phase, upon restoration the site will provide an improvement to the landscape character, visual amenity and biodiversity.
- 5.26. Policy 21 goes on to say that *“mineral extraction within the Green Belt will be supported provided that it preserves the openness of, and does not conflict with the purposes of including land in, the Green Belt”*.
- 5.27. The proposed development is an extension to an existing mineral site, whereby the processing of mineral will take place within the existing and approved processing facility located in the existing quarry, to the west of the extension site. This will negate the need for built development within the application site itself. Topsoil’s will be stored temporarily in soil storage bunds to the north, west and south of the extraction area. These soil bunds are temporary in nature and small in scale. They will not impact upon the permanence or openness of the Green Belt in the long-term.
- 5.28. Following the test of openness, the NPPF states that mineral extraction must also not conflict with the purposes of including land within the Green Belt. The purposes of the Green Belt are set out in paragraph 138 of the NPPF. The development will not conflict with these purposes, as explained below:
- a. To check the unrestricted sprawl of large built-up areas  
  
The development does not include built development and although located adjacent to residential development in New Denham and close to Uxbridge, it will not result in urban sprawl.

The development is also temporary and the site will be restored to a lake with additional habitat creation, which will preserve the current level of openness.

b. To prevent neighbouring towns merging into one another

The site does not lie between two towns and does not include built development that would lead to the merging of urban areas.

c. To assist in safeguarding the countryside from encroachment

The development will not lead to encroachment into the countryside: the development does not involve built development; the development is temporary; and will be restored to a lake with additional habitat creation, including tree and hedge planting.

d. To preserve the setting and special character of historic towns

The nearest conservation area to the extension site is Denham Village and the closest Listed Buildings are the Dog and Duck Public House, circa 360m to the north-east and Southlands Manor, circa 400m to the west. These historic features are sufficiently distant from the site so as not to experience a detrimental effect from the development.

e. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The application site is not derelict or other urban land and therefore this development cannot assist in urban regeneration. The development is for mineral extraction and therefore can only be worked where it is found. The development will ensure the best use is made of the available mineral at this site, in line with the NPPF, and reduce the requirement for new sites to be worked.

5.29. As such, the development falls within the listed exceptions as set out in paragraph 150 of the NPPF, as being not inappropriate development in the Green Belt. As such, the development also complies with Policy 21 of the MWLP.

Flood Risk

5.30. The site is located within Flood Zone 1, as designated by the Environment Agency, which has a low probability of flooding (1 in 1000 year event). 'Sand and gravel working' is considered 'water-compatible development' and is therefore considered appropriate within this Flood Zone (see PPG).

- 5.31. Policy 16 of the BMWLP sets out that *“proposals for minerals and waste development must demonstrate that the proposed development is environmentally feasible, secures a good standard of amenity and would not give rise to unacceptable adverse impacts on the following: quality and quantity of water resources (including ground and surface waters), source protection zones and flood risk...”*
- 5.32. The NPPF Sequential Test gives preference to locating new development in areas that are at the lowest risk of flooding. As the site is located within Flood Zone 1, which has the lowest risk of flooding, the proposals are deemed to satisfy the requirements of the NPPF ‘Flood Risk’ Sequential Test.
- 5.33. As the proposed development for sand and gravel extraction, is considered to be ‘water compatible’ and as such, is appropriate development within Flood Zone 1 (see PPG). There are no historical flood events recorded for the area of the site.
- 5.34. The FRA concludes that the risk of flooding from all sources at the site is negligible and that the development will not result in any short or long-term adverse impacts on flooding locally.

#### Ecology and Biodiversity

- 5.35. Policy 18 of the MWLP seeks to conserve and enhance natural assets and resources, including protected and notable species. Policy 24 requires that mineral development proposals incorporate measures to enhance environmental assets, including opportunities to delivery net gain in biodiversity.
- 5.36. As set out within the Ecological Assessment, the habitats directly affected by the development are of low ecological value. It is not expected that there will be any significant effect upon any protected, priority or notable species. As part of the restoration of the site, additional biodiversity features will be created, including a lake, tussocky grassland, species rich meadow, hedgerows and broad-leaved woodland.
- 5.37. The restoration scheme is calculated to provide Biodiversity Net Gain which far exceeds the requirements of the Environment Act 2021, including 77.84% improvement in habitat units and 109.43% improvement in hedgerow units.

#### Working and Restoration

- 5.38. The scale of the site lends itself to being worked as one continuous phase. It is expected to be worked out within circa 18 months, with restoration following on immediately behind. This will enable the site to be worked with minimal impact upon the local environment and nearby residential receptors and restored within a reasonable timeframe to a high standard.

- 5.39. Policy 25 of the MWLP requires that mineral development proposals include a restoration scheme that enables the site to be progressively restored to an acceptable condition as soon as is practicable and provide for high quality aftercare.
- 5.40. The proposed development complies with Policy 25 in that the site will be worked as one phase due to its scale and promptly restored with indigenous materials to an afteruse in keeping with the adjacent existing quarry and surrounding area. The site will be restored to open water with species rich grassland and broad-leaved woodland.
- 5.41. The development will see a permanent change of use of agricultural land to a lake species rich and other grassland, and broad-leaved woodland. This will result in the 'loss' of 0.4ha of agricultural land in ALC Grade 2, 4.2ha of subgrade 3a and 0.5ha of subgrade 3b. These are all assessed as being permanent, slight adverse, which is not significant. On balance, the significant biodiversity gain outweighs the relatively small scale loss of agricultural land.
- 5.42. Upon restoration, the site will be managed and maintained in line with the approved Aftercare Scheme for the existing quarry, which can be extended / updated to incorporate the proposed extension site.

#### Amenity

- 5.43. Policy 16 of the MWLP states that minerals development proposals must demonstrate a good standard of amenity and not give rise to unacceptable adverse impacts.
- 5.44. The site will be worked as an extension to the quarry and will operate in accordance with existing mitigation measures relating to environmental and amenity protection. A minimum buffer zone of 50m will be provided between the site and boundary of the nearest residential receptors.
- 5.45. This application is accompanied by assessments on amenity impacts, including through noise, air quality and visual impact. Each one concludes that, with appropriate mitigation measures, the development would not result in unacceptable impacts.

#### Summary

- 5.46. The need for mineral yielded within this modest extension will outweigh the minimal and adequately mitigated impacts associated with the development. The development accords with the individual policies within the Development Plan as well as the Development Plan as a whole and therefore planning permission should be granted.

**6. Conclusion**

- 6.1. This application seeks planning permission for an extension to the east of New Denham Quarry. The site will be worked following extraction within the northern extension area and will be supported by infrastructure within the existing quarry. The site will be restored using site derived materials to open water with species rich grassland and broad-leaved woodland.
- 6.2. The development complies with the individual policies within the Development Plan as well as the Development Plan when read as a whole, therefore planning permission should be granted without delay.

**Drawings:**

<b>Location Plan</b>	<b>M12.162(n).D.001A</b>
<b>Existing Site Plan</b>	<b>M12.162(n).D.010</b>
<b>Extraction Design</b>	<b>M12.162(n).D.002C</b>
<b>Restoration</b>	<b>M12.162(n).D.003F</b>
<b>Cross Sections</b>	<b>M12.162(n).D011</b>