

Application Number and Registration Date	MO/2017/1620 (Detailed) 12-Sep-2017
Applicant	Sutton and East Surrey Water
Case Officer	James Amos
Amendments /amplifications	As amended and expanded upon by drawings and documents received on 16/01/2018, 01/03/2018 and 21/05/2018.
Committee Date	6 June 2018
Ward(s)	Fetcham East Within 20m of Leatherhead South Ward
Proposal	Construction of a Chlorine Dosing Building (including an Emergency Air Scrubber Building) (450m²), a Dosing Building (580m²), internal access road and the demolition of the Existing Chlorine Store, Backwash Tank and Overflow Tank.
Site Description	Elmer Works, Guildford Road, Fetcham, Surrey

RECOMMENDATION: Approve subject to conditions

Summary

The application site is an established water treatment works located on the south-eastern side of Hawks Hill in Fetcham. The site is located within the Metropolitan Green Belt. Planning permission is sought for the erection of two new buildings, a Chemical Storage Building and a Chemical Dosing Building, together with an internal access link road.

The site is classified as ‘previously developed land’ within the Green Belt and the proposals are not considered to comprise inappropriate development in the Green Belt. Notwithstanding this, the applicants have demonstrated a need for the development in order to maintain the supply of clean potable water to their customers. The proposed development would replace plant which has exceeded its intended design life, does not meet current standards for safety, security and environmental protection and no longer runs at optimum efficiency. The proposed development would therefore reduce the risk of plant failures,

improve efficiency and reduce maintenance costs. The applicants state that failure to complete the upgrade could result in possible interruptions in the supply of drinking water to SESW's customers (which SESW has a legal obligation to supply), increased risk to the health and wellbeing of staff and visitors, increased risk of adversely affecting the environment if the plant fails and failure to comply with a suite of other regulations.

It is recognised that the buildings on the site are visible in views from south Leatherhead and in recognition of this, the applicants have proposed to paint both the proposed buildings and existing buildings on the site a dark olive green in order to mitigate their impact on those views. In addition, they propose to add a parapet to the top of the north-east facing elevation of the existing RGF Building which would screen the light coloured roof. It is considered that these measures would help to reduce the impact of both the proposed buildings and existing buildings on the visual amenities of the wider area.

The proposed development would also provide for improvements to the safe storage of the chemicals on the site, and improvements to the noise environment around the site. It is considered therefore that there would be an improvement in the amenity of residents around the site.

In the light of these comments it is considered that the proposals comply with national and local planning policy and it is recommended that planning permission be granted, subject to conditions.

1. Development Plan

- 1.1. Metropolitan Green Belt, Site High Archaeological Potential, Adjacent Bocketts Lane SNCl, 400 metres from Area of Outstanding Natural Beauty

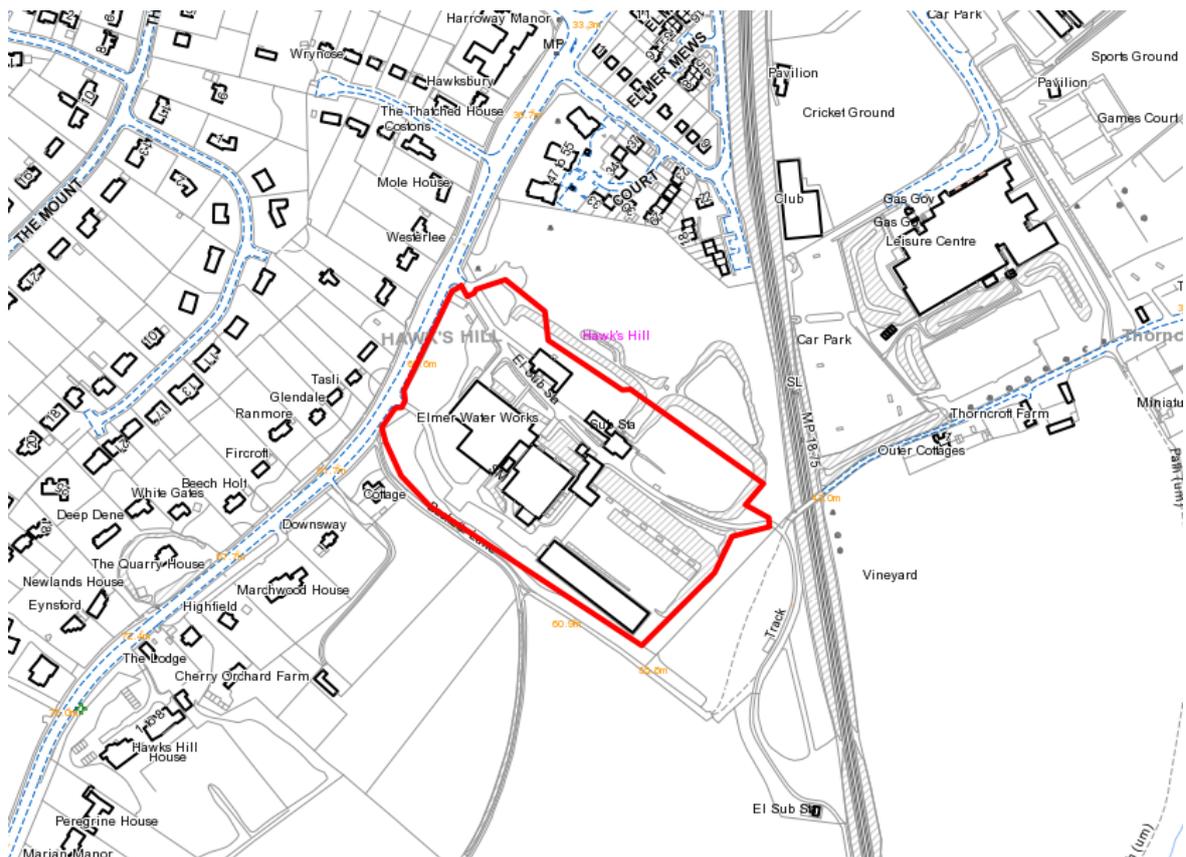
2. Relevant Planning History

LEA/4120	To erect office and messroom	Permission 12/11/1948
LEA/12063	To extend store building to provide covered lorry loading bay and additional detached store.	Permission 13/04/1960
MO/84/1308	Demolish and rebuild part of administrative block.	Permission 01/02/1985
MO/85/0786	Demolish and rebuild part of administration block; single storey gas store.	Permission 16/08/1985
MO/2003/0819	Erection of 3 buildings comprising: rapid gravity filter building; interstage pumping station and flocculation tank; ammoniation building. Total floor space 2010sqm.	Permission 19/09/2003
MO/2003/1894	Details of the design and appearance of the buildings permitted under outline approval MO/03/0819, together with details of landscaping.	Permission 05/02/2004
MO/2004/0822	Revised design of RGF (Rapid Gravity Filter) Feed pumping station building, approved under MO/03/1894. Height of building increased by one metre.	Permission 07/07/2004

MO/2005/1563	Stationing of 3 No. porta cabins, for temporary period of two years, to provide office and storage accommodation, plus toilet. Porta cabin dimensions 8.5m x 3.5m x 2.57m (H).	Permission 31/10/2005
MO/2006/0626	Erection of single storey steel framed storage building, 10 metres by 7.5 metres.	Permission 19/06/2006
MO/2008/0232	Installation of 1 no. single storey Portakabin to provide temporary accommodation for education facilities.	Permission 28/03/2008
MO/2011/1341	Certificate of Lawfulness for a proposed development in respect of the installation of photovoltaic panels.	Granted 15/11/11
MO/2011/1672	Extension/upgrading of existing generator fuel storage system.	Permission 03/02/2012

3. Description of Development

- 3.1. The application site is the Elmer Water Treatment Works, located on the south-eastern side of Hawks Hill, in Fetcham, approximately 200m to the south-west of the roundabout junction with Cobham Road. The site is located to the east of the main built up area of Fetcham and is located within the Green Belt. The road frontage of the site is marked by a tall steel palisade fence, to the rear of which is an open area which contains a number of mature trees. The site slopes significantly from south-west down to the north-east.



- 3.2. The site is bounded to the east and north by open space, to the west by Hawks Hill and to the south by a bridleway. Beyond the bridleway to the south is open space which is designated as a Site of Nature Conservation Importance.
- 3.3. The site itself is occupied by a number of buildings and structures which SESW use to supply potable water to residents and commercial properties in East Surrey and parts of West Sussex, Kent and south London. The Elmer Water Treatment Works abstracts water from boreholes located on and around the site and supplies water to 65,000 properties and 150,000 people.
- 3.4. The Water Treatment Works was originally established on the site in 1935 and the site has since been upgraded and extended on several occasions. The last major modification was undertaken in 2006 when a new filtration plant was installed (planning ref: MO/2006/0626). The applicants state that many of the original buildings are still in use today and the majority of the plant that is proposed to be replaced as part of this application was installed in 1986. They state that the design life of this plant was 20 years and although it still functions, it does not meet current standards for safety, security or environmental protection. Furthermore, elements of the plant are no longer running at optimum efficiency and spare parts are becoming increasingly difficult to source.
- 3.5. There are two vehicular access points into the site from Hawks Hill. The south-western access point opens onto an access road which runs close to the south-western boundary past a number of buildings and structures to a small car parking area in the centre of the site. To the south-west of the car parking area is the RGF/UV building dating from 2006 and a number of subterranean tanks.
- 3.6. The north-eastern access point leads into a second access road further down the slope and provides access to the northern part of the site. At present, vehicles wishing to transfer between the two access roads need to exit the site onto Hawks Hill and re-enter via the other access road.
- 3.7. The current application seeks planning permission for the erection of a Dosing Building, a Chlorine Dosing Building (including an Emergency Air Scrubber Building) and an internal access road.
- 3.8. The Dosing Building would be located in the middle of the site and would have a footprint of 580m² with a maximum height of 12.7m. It would be provided with a 'lean to' roof that would lean to the southwest and would be wholly constructed of steel cladding with a steel roof. The building would be painted a dark green colour in order to help it merge with the background vegetation. The building would replace the existing lime dosing facility with a new building which would be used for lime storage and dosing. The location of the proposed building is on an existing embankment where overflow tanks are housed underground and a chlorine store which would be demolished as part of the proposed development. Three further buildings, namely the Backwash Pumping Station, the Backwash Tank and the Ammoniation Building would be removed as part of the development. The Dosing Building would be located immediately to the north of the Softening Building which has a footprint 1,555m² and immediately to the west of the Sludge/Lime Plant Building (which has a footprint of 2,250m²). Additional buildings within Elmer WTW are located to the north and south of the proposed Dosing Building, and as such, the proposed Dosing Building would be set within a built environment within the site.
- 3.9. The Chlorine Dosing Building would be located to the east of the existing buildings and would have a footprint of 450m² with a maximum height of 6.8m. The roof would be of a gable construction and will slope southeast to northwest. The Chlorine Dosing

Building and Emergency Air Scrubber Building would be constructed of brick cladding with a steel roof. Hardstanding (asphalt) would be provided adjacent to both of the buildings. The applicants state that the location of the proposed building is dictated by Health and Safety Guidance 28 – Safety Advice for Bulk Chlorine Installations (Health and Safety Executive, 1999) which states *“When choosing the location for your chlorine area, the location of other on-site buildings in relation to the prevailing wind direction needs to be considered. It is recommended that the chlorine area should be located downwind of buildings that are regularly occupied. Ventilation intakes to occupied rooms should be at least 25m from the chlorine installation...”*

3.10. The applicants have confirmed that the volume of chemicals stored on the site will not be increased as a result of these proposals. The proposed buildings would replace plant which has exceeded its intended design life, does not meet current standards for safety, security and environmental protection and no longer runs at optimum efficiency. The proposed development would therefore reduce the risk of plant failures, improve efficiency, reduce maintenance costs and ensure that Elmer WTW complies with the following regulations:

- The Water Supply (Water Quality) Regulations 2016
- The Water Supply (Water Fittings) Regulations 1999
- Control of Substances Hazardous to Health 2002
- HSG28: Safety Advice for Bulk Chlorine Installations
- HSG40: Safe Handling of Chlorine Drums and Cylinders
- HSG71: Chemical Warehousing
- HSG76: Warehousing and Storage
- HSE L22: Safe use of work equipment. Provision and Use of Work Equipment Regulations 1998

3.11. The applicants state that the proposed development would see the construction and operation of new plant at Elmer WTW which would ensure that SES Water is able to continue to meet its legal obligation as a statutory undertaker to provide potable water to the 65,000 properties and 150,000 people supplied by Elmer WTW.

3.12. The Building Phasing Strategy for the proposed development at Elmer WTW would be as follows:

1. Construction of the proposed chemical building to facilitate the demolition of the existing chlorine store.
2. Demolition of the existing chlorine store and overflow tanks (including embankment).
3. Construction of the proposed dosing building on the footprint of the demolished chlorine store and overflow tanks.

3.13. The proposed internal access road would be located at the north-western end of the site and would link the existing northern and southern access roads. It would be constructed of asphalt in an open area of the site. A number of trees would be lost as a result of these works, for which replacements are proposed.

3.14. During consideration of the planning application, and following the receipt of a large number of objections to the proposals, the applicants have offered to repaint a number of existing buildings on the site the same dark green colour as the new buildings in order reduce their impact when viewed across the valley from South Leatherhead. These would be as follows:

- RGF building (NE and SW Elevations)
- Softening building (NE and SW Elevations)
- Workshop buildings (All Elevations)
- Office block (All elevations)
- Backwash pump house (All elevations)
- Access chamber upstands (All elevations)

3.15. Furthermore, additional mitigation is proposed to the existing RGF/UV Building in the form of a parapet along the north-east elevation to reduce the visual impact of the building from south Leatherhead and to prevent sunlight being reflected towards South Leatherhead.

4. Consultations

4.1. Tree Officer: The Council's tree officer has commented as follows:

- *I have no tree related concerns or objections to the proposals in principle or on policy grounds. There are no protected trees on the site. Mature trees screen the site on all boundaries including a large belt on the western side of the site. The new access is the only element to affect amenity trees.*
- *The tree protection report and plan indicates the removal of three large mature trees from behind the western tree belt including;*
 - *14m Beech (T1),*
 - *18m Sycamore (T13),*
 - *18m Maple (T17).*
- *The impacts of the removals will be limited given the depth of the tree belt.*
- *The landscape plan (60506231-DWG 0003) shows six native replacement trees to be planted including three Field Maple alongside the new access.*

4.2. Mole Valley Drainage Consultant – With regards to the original submission the following comments were made:

'Further information is required prior to recommending approval on this scheme. However, my comments below may be handled in a condition if there is sufficient comfort that a scheme is viable on the site.'

Because of the nature of the materials handled on site, the applicant should be providing a more detailed scope of any potential contaminants discharging from the new build areas and how they are to be treated in line with current guidance. No foul water (or in deed trade effluent) scheme has been proposed in the document.

This is not my area of expertise so I would expect Thames and the EA to make more detailed comments regarding water quality and discharge as statutory consultees. I am happy to engage the consultant in discussions so they can provide more clarity on the nature of the scheme.

I will make the comment that a filter strip for the access road will need to be positively drained based on the geological information contained within the report (unless they can show otherwise). In addition, the new build for the Dosing Building will require flow control and attenuation, rather than just discharging into the existing surface water system.'

4.3. Following the receipt of further information in response to the above, further comments were received as follows:

'I agree with all the responses ... and that a strategy in principle is acceptable.'

- 4.4. Environmental Health – There is a requirement for a plant noise assessment to be provided before works commence. A condition is recommended to this effect.
- 4.5. The applicants have subsequently submitted a noise assessment. The Council's Environment Health Officer has reviewed the report and makes further comments as follows:

It is noted in the Design and Access Statement that the application is required for the following purpose:

The scope of works associated with this planning application mainly includes replacing plant which was installed in 1986. This plant is no longer within its intended design life of twenty years. The plant to be replaced does not meet current standards for safety, security or environmental impact. Elements of the plant are no longer running at optimum efficiency and spare parts are becoming increasingly difficult to source.

As a result the operator predicts the following shortcomings

- *Possible interruptions in supply of drinking water to customers*
- *Increased risk to the health, safety and wellbeing of staff and visitors*
- *Increased risk of adverse effects to the environment*

I can also confirm I have reviewed the AECOM Report dated 26th February 2018 and that we would consider the monitoring locations to be reasonable to both

- *Assess background levels at the site and*
- *The plant impacts of the proposed installation*

The applicants state the plant will be a replacement for existing equipment that is at the end of its design life. The submitted plans indicate that deliveries to the buildings will be enclosed; this is confirmed by discussions with the planning officer. Based on this information and the noise assessment we consider the application represents a betterment of the site in relation to environmental noise levels and that the scheme will not cause tangible harm to local residents.

Based on the information submitted I can confirm that Environmental Health would support this application as providing a reduced noise impact on the local environment compared to the existing facilities. However in order to ensure compliance and betterment for the final installation we would recommend that a condition be imposed which acknowledges the work carried out while also giving a minimum standard of compliance of 5db below the current noise levels.

- 4.6. Historic Environment Officer: These comments are made in relation to the impact of the proposal on the setting of the Leatherhead Town Centre heritage asset, the character and setting of which we are charged with ensuring is preserved or enhanced.

It is clear in national guidance produced by Historic England that the 'setting' of a heritage asset can be affected by works some distance away from the heritage assets itself. Views out from a heritage asset, in particular, are identified as being an important factor to take into account when considering the impact of a development proposal.

Although the Elmer Works site is a considerable distance from the boundary of the Leatherhead Conservation Area, it can be seen in views out from various places, including the graveyard and garden terrace adjacent to the parish church. The Leatherhead Conservation Area Character Appraisal (2010) specifically draws attention, both in the text and on the townscape map, to the attractive views out across from the town to the tree lined ridge of the downs beyond. This setting is identified as a positive element in the character of the town centre and so effort should be made to ensure that harm is avoided.

It is clear when looking at the current view (which will become more exposed as leaves fall from the trees in the foreground) that the existing industrial developments around the application site are already intruding into the view. The long roof line of several buildings and the light colour and slightly reflective nature of the roof material, in particular, means that the buildings stand out against the surrounding hillside. We should ensure that the new buildings do not stand out, but rather that they are assimilated into the landscape. If any new buildings are as prominent in the vista, then I would argue that this would be harmful to the setting (and so to the significance) of the heritage asset, and I would raise a objection.

The most obvious way to minimise or even avoid any potential harm, apart from the design of the buildings itself, is to use a specific palette of agreed construction materials that are as dark as possible and non-reflective (particularly the roofs). The extensive use of additional screen planting and other landscaping measures, such as ground level re-contouring, may achieve this aim. I therefore suggest that the applicants be asked to specifically address this issue and come up with some suggestions as a part of the determination of this application. Given the offer noted above to paint the existing and proposed buildings a dark olive green colour, the HEO is now satisfied with the proposals.

- 4.7. Surrey CC Archaeology Officer – *The proposed development is partially located within an Area of High Archaeological Potential (AHAP) defined around the possible presence of a known Anglo-Saxon cemetery that may extend into the development site. The applicant has taken on board the archaeological implications of the proposed development and has submitted an archaeological desk based assessment (DBA), produced by their archaeological consultants AECOM Infrastructure & Environment UK Limited, in support of their application.*

The DBA provides suitable data on which the archaeological potential of the site can be assessed. It indicates that there is a high potential for the presence of Heritage Assets of archaeological significance from the prehistoric through to the medieval period within the study area and a high potential for Anglo-Saxon features, in particular outlying burials of the known Hawks Hill cemetery, within the development site.

Given that high potential, I would agree with the report that there is a need for further archaeological work in the form of a trial trench evaluation to determine the archaeological potential along the extent of the proposed internal access road.

The evaluation would best take place ahead of the removal of any trees that may be required, with its results used to inform the need, or otherwise, for further mitigation measures in that area. Such measures may take the form of archaeological monitoring or excavation.

I also agree with the report's conclusion that archaeological monitoring of the groundworks is required at both locations relating to the new structures, unless, as development plans and available information progress, it can be evidenced that the

archaeological horizon has either been destroyed or will not be impacted by the developments in those areas.

Given that any Heritage Assets that may be present are unlikely to be of national significance requiring preservation in situ, I would recommend that securing the archaeological work as a condition of any planning permission is an acceptable and proportionate response. To ensure the required archaeological work is secured satisfactorily.

- 4.8. Surrey Hills AONB Officer: With regards to the original submission, the AONB officer commented as follows:

I recall about 13 years ago concerns were raised by some local residents on the other side of the valley about the visual impact of the large building on this site built at that time. Aidan Gardner in your office will be able to advise the case officer including any implications for the determination of this application.

As the site is neither within the AONB nor AGLV the AONB planning issue is whether the proposed buildings would adversely impact upon the setting of the AONB through harming public views into or from the AONB. Policy LU5 of the Surrey Hills AONB Management Plan and Government Planning Practice Guidance on Natural Environment - Landscape (paragraph 0003) both seek to avoid development harming the setting of an AONB.

The nearest part of the AONB is the river valley between the river and the Dorking Road to the east and Norbury Park to the south. The AONB at Mickleham Downs is some distance away.

I do not consider that the setting of the site would result in views into the AONB being harmed by the proposed development.

Being located fairly high on the hillside the existing water treatment buildings have a significant visual impact from several locations in South Leatherhead. When visible from the AONB the proposed buildings would be seen in the context of the whole more extensive treatment works. But this should not be taken as a justification for not seriously considering the bulk, form and particularly in this case, the external colour of the buildings including roofs and the landscaping.

No information has been submitted on the external colour of the buildings. Whilst that can be subject of a planning condition, from past experience of the development on this site referred to above, the colour and texture of the external materials are so important that I consider they need to be addressed at the outset. The importance of materials can be too easily overlooked when a letter is subsequently submitted for approval following a planning condition.

Buildings seen mostly against a darker background should also be darker in colour. Where they are mostly seen against the sky, which is not so much the case here they should be lighter in colour. The problem with the colour of some of the more recent buildings on the site is they are too light in colour standing out against their darker background. The material and colour of the roofs can influence the degree to which light is reflected. Again, a previous problem was the light colour and reflective nature of the new roofs such that they were conspicuous in the landscape. That should be avoided this time with the choice of a darker colour and non reflective roofing material.

A Tree Retention and Protection Plan has been submitted but I could not find anything about new planting on the website. I consider the Council should take this opportunity of negotiating as substantial as possible tree planting scheme to help soften in time this harsh looking and conspicuous development. This planting should be particularly along the south and south east boundaries, albeit there is little room.

Subject to the above I do not wish to raise a protected landscape concern.'

4.9. With regards to the additional submission, the AONB officer commented as follows:

It is considered that the proposals to change the colour of not only the proposed buildings, but also many of the existing buildings to dark olive green, is a significant improvement upon the originally submitted application. However, is there any possibility of toning down the roofs because their light colour is probably the main reason for these buildings standing out against their dark backgrounds? If that were done the visual impact of the proposed and existing development might even be less than currently with the existing buildings and would represent a planning betterment that can be taken into account by the Planning Authority in balancing all the different planning considerations. Reference is made in the revised submission to possibly constructing a parapet to hide the light colour of and reflection from the light coloured roofs.

If this were not to result in just higher looking buildings it may need to be of a different finish, possibly of a mesh construction. But the preference is definitely for darker colour and non-reflective roofs so as not to contrast with the darker background.

It also seems that the line of trees planted in pots are being dispensed with and in looking odd and artificial they tend to draw attention to themselves in landscape views. If the ground conditions allow for it, their replacement with more informal and irregular planting would be better.

Officer Comment: The ground conditions in front of the RGF building would not allow replacement planting to take place. Below ground, this area is occupied by tanks and other structures and planting cannot take place.

4.10. Surrey Wildlife Trust: *The Trust would advise that the Preliminary Ecological Appraisal (PEA) Report by CH2M Hill INC dated August 2017, which the applicant has provided in support of the above planning application, provides much useful information for the Local Authority to be able to assess the potential status of protected and important species on the proposed development site and the likely effect of the development on them. We would therefore further advise the Local Authority, that should they be minded to grant this planning application for this site, the applicant should be required to undertake all the recommended actions set out in the Report, including the 'generic' mitigation. This will help prevent adverse effect to legally protected species resulting from the proposed development works and help to off-set adverse effects to the biodiversity value of the site resulting from the proposed development.*

4.11. Environment Agency: The EA has reviewed the document 'Phase 1 Geo-environmental Report' by AECOM (reference 60506231 Rev 02 dated 31/01/2018). The report has assessed the site's geo-environmental risk as 'moderate' and has recommended an intrusive ground investigation to assess this. The Environment Agency consider that planning permission should only be granted if a condition is imposed requiring the ground investigation works.

4.12. Thames Water: No objections are raised with regards to sewage infrastructure capacity.

4.13. National Rail – No objections raised, subject to the following comments:

- As the proposed application site is adjacent to Network Rail's operational railway infrastructure, Network Rail requires the developer to sign asset protection agreement with Network Rail Asset Protection team prior to commencement of any design and construction works on site.
- Ground contamination assessment to be carried out to ensure there are not effects to adjacent grounds.
- Drainage strategy to be submitted to ensure that any drainage from development does not affect Network Rail drainage assets. Any soakaways should be at least 20m from NR boundary.
- Applicant to also submit RAMS landscaping works including tree works.
- The new chemical building adjacent to Network Rail boundary will be a steel portal frame structure. Applicants will need to submit for NR acceptance design forms and method statements for all temporary works which may impact on NR assets and railway operation such as scaffolding etc. if collapse radius encroach Network Rail zone of influence.
- Applicants to submit lifting plan for all lifting adjacent to Network Rail boundary

5. Representations

5.1. 86 letters of representation have been received raising the following summarised concerns:

- Impact of noise pollution
- Lack of screening and landscaping; previous planting has failed to provide an adequate screen
- Visual impact of the new buildings in long views across the Mole Valley
- Proposed building is four times the size of the existing chemical dosing facility
- Removal of trees
- Increase in light glare from artificial lighting
- Harmful impact on the Green Belt
- Out of keeping with the area
- The proposed materials would not blend in with the surrounding countryside
- Sunlight reflected from existing buildings
- The site is close to the AONB
- Increase in traffic
- Chemical pollution risk from chemical storage on the site, in close proximity to residential properties and the nearby Leisure Centre
- No reference to mitigation of pollution and no mention of removal of asbestos
- Impact on the highway
- Highly visible from Leatherhead Conservation Area
- Lack of archaeological investigation
- Contrary to policy
- Lack of tree screening around the boundaries of the site
- The chemical dosing building should be located underground and the chemicals stored off site at a secure industrial estate
- The efforts to screen/camouflage the buildings are welcomed, but this should be extended to the roofs of the buildings and the south elevation of the RGF building

- The attempt to mitigate the light glare by painting the buildings green will have little or no effect on the visual impact of the massive bulk of the buildings
- The 'pots' should also be painted/camouflaged
- There are no precedents for this form of development in the Green Belt, close to residential properties
- There have been previous incidents at the site which demonstrate its unsuitability for chemical storage
- The transfer to chemicals from the storage building to the doing building will be pipe which could result in leaks

5.2. Leatherhead Residents Association (LRA) have sent in two letters of objection which raise the following summarised concerns:

- Visible from Leatherhead Conservation Area, St Mary's Church and the wider landscape
- Increase in density of built development on the site which would not preserve the openness of the Green Belt
- Result in overdevelopment of the site
- Dominant in the landscape; application should be used as an opportunity to improve the appearance of existing buildings on the site
- Does not blend into the surrounding area
- Additional landscaping should be provided
- The new road within the site should be considered as inappropriate development within the Green Belt. If allowed, it should be screened from view by new planting

5.3. With regards to the modifications made to the application LRA make the following comments:

- Welcome the proposals to paint the buildings but consider that the colour should be looked at carefully by relevant experts to ensure that it is the correct colour to camouflage the buildings
- Maintain that the roofs of the buildings should also be painted

5.4. Fetcham Residents Association make the following summarised comments:

- The profiles, materials and colours of the new buildings should be designed to blend into the natural scenery and backdrop;
- colours and materials of existing structures on the site should be adapted to allow those structures to blend into the natural scenery and backdrop

5.5. The Surrey Branch of the Campaign for the Protection of Rural England (CPRE) raise the following summarised concerns:

- The proposals will have a greater impact on the openness of the Green Belt
- The proposals should therefore be considered as inappropriate development within the Green Belt.
- Very special circumstances would need to be demonstrated to outweigh the harm that is caused.

5.6. A letter has also been received raising no objections in principle to the proposals subject to the provision of tree planting, bird and bat boxes and confirmation that there would be no impact on wildlife.

5.7. The applicants have submitted further information which sets out the measures to be taken in relation to the painting of the existing buildings on the site. Further consultation has been undertaken and any further comments will be reported in the Addendum Report.

6. Main Planning Policies

6.1. Government Guidance

Section 7 – Requiring Good Design
Section 9 - Protecting Green Belt land

6.2. Mole Valley Core Strategy

CS1 – Where Development will be Directed (A Spatial Strategy)
CS13 – Landscape Character
CS14 – Townscape, Urban Design and the Historic Environment
CS17 – Infrastructure, Services and Community Facilities

6.3. Mole Valley Local Plan

ENV12 – Sites of Nature Conservation interest
ENV22 – General Development Control Criteria
ENV23 – Respect for Setting
ENV53 – Trees in the Built Up area
MOV2 – The Movement Implications of Development

7. Main Planning Issues

7.1. The main planning issues for consideration are as follows:

- The principle of the development
- Development within the Green Belt
- The impact of the proposals on the visual amenities of the area
- The impact of the proposals on the amenities of local residents
- Highways issues
- The impact of the proposals on trees

The principle of development

7.2. The application site is a long established infrastructure use on the edge of the built up area of Leatherhead, located within the Metropolitan Green Belt. The proposal for which planning permission is sought represents improvements and enhancements to the existing water treatment facilities which will be of benefit to the general population in the longer term

7.3. The principle of providing improved infrastructure facilities is strongly supported by the government. Paragraph 162 of the NPPF states as follows:

Local planning authorities should work with other authorities and providers to:

- *assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and*
- *take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.*

7.4. Further support for improvements to infrastructure facilities is contained within the Mole Valley Core Strategy. Policy CS17 states, *inter alia*, that the Council will support

the development of new infrastructure where required and will safeguard land for infrastructure if identified by the Council and other service providers.

- 7.5. It is considered therefore that the improvement of the water treatment facilities at the site is supported by both national and local planning policy.

Development within the Green Belt

- 7.6. Paragraph 87 of the NPPF states that inappropriate development within the Green belt is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

- 7.7. Paragraph 88 states when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

- 7.8. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

- 7.9. It is considered that the proposals amount to 'partial redevelopment' and 'limited infilling'. Accordingly, these proposals are considered against the sixth NPPF exception criteria.

- 7.10. Previously developed sites are defined as follows (NPPF Annex 2):

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time'.

- 7.11. Elmer WTW was originally established in 1935 and has been in active use as a water treatment works since its establishment. Elmer WTW is a significantly engineered site and contains a number of existing buildings and built structures which are housed under landscaping. The site therefore satisfies the NPPF definition of previously developed land.
- 7.12. The proposals comprise two new buildings and an internal access road. The proposed Dosing Building would be located within the campus of existing built development on the site with existing development on all sides. The new building would have a footprint of 580m², and a maximum height of 12m. It would be viewed in the context of existing built development and would not in itself have a greater impact on openness on the Green Belt and the purpose of including land within it than existing built development.
- 7.13. The Chlorine Dosing Building would be located to the east of the existing buildings and would have a footprint of 450m² with a maximum height of 6.8m. The new building would extend the footprint of built development on the site in a south easterly direction onto land which is currently open.
- 7.14. The applicants state that the location of the proposed building is dictated by Health and Safety Guidance 28 – Safety Advice for Bulk Chlorine Installations (Health and Safety Executive, 1999) which states *“When choosing the location for your chlorine area, the location of other on-site buildings in relation to the prevailing wind direction needs to be considered. It is recommended that the chlorine area should be located downwind of buildings that are regularly occupied. Ventilation intakes to occupied rooms should be at least 25m from the chlorine installation...”*
- 7.15. This building would be located further down the slope of the valley and would be partially screened from views from the east by existing vegetation. The top of the structure would be visible in long-distance views across the valley, and in time, the additional planting that has been undertaken on the north-eastern boundary of the site will screen this building from longer views.
- 7.16. The proposals involve the demolition of two small buildings on the site together with the erection of the two new buildings. Existing development on the site, including underground structures has a gross floor area of 11,893m². The two buildings to be demolished, ie the existing Chlorine store and the Enelco filter washwater/backwash tank (an underground structure) together have a floor area of 559m², whilst the proposed buildings have a floor area of 1030m². This results in an increase in the footprint of built development on the site of 491m², which equates to a 4.1% increase.
- 7.17. With regards to overground structures only, existing overground development has a gross floor area of 6,746m². The existing Chlorine store to be demolished has a floor area of 104m², whilst the proposed buildings have a floor area of 1030m². This results in an increase in the footprint of overground built development of 926m², a 13.7% increase.
- 7.18. The proposed Chemical Dosing Building would be contained by virtue of the building being located within the developed part of the site and surrounded by existing buildings. The proposed Chemical Building would be located close to existing buildings but for the reason stated above, slightly apart from them. As noted above, the site is classified as previously developed land and as a result, it is considered that the proposals would not have a greater impact on the openness of the Green Belt or for the purposes of including land within it than the existing development. In this regard

therefore, it is considered that the proposals do not comprise inappropriate development within the Green Belt.

- 7.19. The proposals also include the formation of a new internal access road which would link the existing northern and southern access road internally within the site. At present, the site is served by two accesses which serve the north and south of the site. There is currently no formal through road within the site which results in vehicles having to leave the site and travel via Hawk's Hill to gain access to the other part of the site. The applicants state that this is not operationally efficient and poses a security risk as the gates need to be continually opened and closed.
- 7.20. The proposed internal access road would run southwest to northeast and connect to the existing northern and southern internal roads. It would enable vehicles to travel around the site without the need to exit and re-enter via Hawk's Hill. This would remove these short journeys from Hawk's Hill and be of benefit operationally and in security terms for SES Water, as well as reducing traffic movements on Hawks Hill. The proposed development would not result in a change in the number of vehicles serving the site, the number of employees on site or the operational hours of the site. This part of the proposals would not have an impact on the openness of the site, and is therefore not considered to comprise inappropriate development within the Green Belt.
- 7.21. Notwithstanding this, the applicants have put forward a case to demonstrate that there is a need for the proposed development. The applicant is a statutory undertaker providing an essential public service. The proposed development would replace plant which has exceeded its intended design life, does not meet current standards for safety, security and environmental protection and no longer runs at optimum efficiency.
- 7.22. The applicants state that the proposed development would reduce the risk of plant failures, improve efficiency and reduce maintenance costs. Failure to complete the upgrade could result in possible interruptions in the supply of drinking water to the applicants customers (which they state that they have a legal obligation to supply), increased risk to the health and wellbeing of staff and visitors, increased risk of adversely affecting the environment if the plant fails and failure to comply with the regulations set out above.
- 7.23. It is considered, therefore that there are very special circumstances for the development, in accordance with paragraph 87 of the NPPF which would outweigh any harm to the Green Belt caused by reason of inappropriateness.

The impact of the proposals on the visual amenities of the area

- 7.24. Mole Valley Local policy ENV22, General Development Control Criteria sets out seven general criteria for sound development control practice. Criterion 1 requires that development should be appropriate to the site in terms of its scale, form and appearance. Criterion 2 requires that the proposal does not significantly harm the amenities of neighbouring occupiers by reason of overlooking or its overshadowing or overpowering effect. Criterion 3 requires that development should respect the character and appearance of the locality.
- 7.25. Mole Valley Local policy ENV23, Respect for Setting requires that development should take account of the scale, character, bulk and proportions of the surrounding built environment, and that it should not comprise overdevelopment in relation to the size of the plot and/or surrounding developments. Criterion 3 requires that new development has regard to established townscape features, including the space around buildings.

Criterion 5 requires that development should take account of the impact of the development within or conspicuous from the green Belt on the rural amenities of the Green belt by reason of its siting, materials or design whilst criterion 6 requires that development should take account of the impact of the proposals on the landscape of the proposed siting and appearance of new agricultural buildings or works or any other appropriate/exceptional development in the countryside.

- 7.26. The site is well screened from the road frontage at Hawks Hill with mature tree planting in the open area of land at the front of the site. There is less mature planting on the north-eastern, south-eastern and south-western boundaries of the site including an area of recent native tree planting completed in 2015 along the north-eastern boundary of the site which will continue to mature and which in time will provide a thick tree screen along this boundary. Views of the Chemical Dosing Building and the Chemical Building would be limited from Hawk's Hill to extremely glimpsed views, if any, as a result of the location of the new buildings within the centre of site or at the south-eastern end.
- 7.27. Views of the proposed buildings may be possible from the bridleway to the south of the site but these would be limited to glimpsed views of the roof in the background of the existing Softening Building, Sludge/Lime Plant Building and RGF/UV Building. There would be no public views of the Dosing Building immediately to northeast and east of the site. However, long distance views from the south of Leatherhead would be possible, from the opposite side of the Mole Valley some 720m to the northeast of the site.
- 7.28. The impact of the proposals on these long distance views across the valley have raised the majority of objections which have been received, with local residents stating that the lack of screening and vegetation on the north-eastern boundary of the site results in the existing buildings and the proposed buildings having a harmful impact on the views from properties in south Leatherhead of the opposite side of the valley which is harmful to the visual amenities of the area, and harmful to the setting of the listed St Mary's Church and the Leatherhead Conservation Area. It is acknowledged by the applicants that existing buildings, due their size and colour do appear prominent in views across the valley.
- 7.29. The Council's Historic Environment Officer (HEO) has considered the proposals and notes that, although the Elmer Works site is a considerable distance from the boundary of the Leatherhead Conservation Area, it can be seen in views out from various places, including the graveyard and garden terrace adjacent to the parish church. The Leatherhead Conservation Area Character Appraisal (2010) specifically draws attention, both in the text and on the townscape map, to the attractive views out across from the town to the tree lined ridge of the downs beyond. This setting is identified as a positive element in the character of the town centre and so effort should be made to ensure that harm is avoided.
- 7.30. The HEO states that it is clear when looking at the current view (which is more exposed in the winter months) that the existing industrial developments around the application site are already intruding into the view. The long roof line of several buildings and the light colour and slightly reflective nature of the roof material, in particular, means that the buildings stand out against the surrounding hillside.
- 7.31. It is suggested that the most obvious way to minimise or even avoid any potential harm, apart from the design of the buildings itself, is to use a specific palette of agreed construction materials that are as dark as possible and non-reflective (particularly the

roofs). The extensive use of additional screen planting and other landscaping measures, such as ground level re-contouring, may achieve this aim. The HEO suggests that the applicants be asked to specifically address this issue and come up with some suggestions as a part of the determination of this application

- 7.32. Similar comments have been made by the Surrey Hills AONB adviser. In response to the proposal to paint the existing buildings, he states as follows:

“I do think the dark olive green colour is appropriate and there would clearly be a benefit in treating the existing buildings in this way. However, is there any possibility of toning down the roofs because their light colour is probably the main reason for these buildings standing out against their dark backgrounds.”

- 7.33. In response, the applicants have proposed to paint the proposed buildings a dark olive green colour as part of the planning application and also to repaint existing buildings dark olive green to reduce their visibility in views from Leatherhead. The buildings to be repainted include the RGF building (NE and SW elevations), the softening building (NE and SW Elevations), the workshop buildings (all elevations), the office block (all elevations), the backwash pump house (all elevations) and the access chamber upstands (all elevations). The applicants have submitted visualisations showing the existing and proposed views which demonstrate impact that the proposed development would have on views and which demonstrate that the additional painting will provide a betterment with regard to how the wider site is viewed from residential and public areas.

- 7.34. A Landscape and Visual Appraisal of the proposals has been carried out by Capita Lovejoy Landscape Architects on behalf of the applicants. The Appraisal notes that existing vegetation both onsite and offsite, offers significant screening and filtering of views into the site from the north, west and south, due to the height and density of the existing mature trees along these boundaries. However, due to the nature of the landform that the development is set within, it is visually exposed to areas on higher ground on the east side of the Mole Valley and due to the nature of the landform (steeply sloping west to east) of the site itself it is not possible to create a visual buffer for softening views from the east as the ground is lower of the side that screening would be situated. The report considers that the baseline visual context is very unattractive when seen in context of the existing landscape.

- 7.35. The Appraisal puts forward a number of ‘Opportunities to enhance the development’ including changing the colour of the buildings to an earthy green colour, Adding parapets to both the north-eastern elevation of the RGF Building and the Softening building to screen the reflective light coloured roofs from the eastern slopes of the Mole Valley, and by changing the colour of the roofs, or adding a ‘green roof’ to both buildings to cover or soften the reflective surface of the roof.

- 7.36. The Appraisal also notes that there are a number of constraints on development including the underground tanks and structures which prevent any substantial planting immediately in front of the RGF building, the potential weight of a green roof on the loading of an existing roof on a building, and the potential for heat absorption from a darker colour on a temperature inside a building.

- 7.37. The Landscape and Visual Appraisal makes the following recommendations in order to assimilate the development into its surroundings, subject to a further review by associated professionals and a ‘buildability’ review:

- Painting the elevations of existing and future proposed buildings in a non-reflective dark earthy-green colour paint. This will reduce the contrast between the built development and the surrounding vegetated landscape. The exact RAL colour would need to be determined by the review of painted test panels on site (panels must be 1x1m minimum); and,
- Painting of the roof of both the RGF Building and the Softening Building with a non-reflective paint which is the same colour as the painted elevations; or,
- Creation of a parapet on the RGF Building and the Softening Building which is of a sufficient height to be able to effectively screen the angled roofs from the receptors on the east side of Mole Valley; or,
- An artificial green roof system to reduce the glare off the roof of the RGF building and the east facing slope of the Softening Building.

7.38. The Appraisal recommends that the following RAL colours would be appropriate for visually softening the development (subject to an onsite review of painted test panels (minimum 1m x 1m):

- RAL 6003 Olive Green
- RAL 6007 Bottle Green

7.39. The report concludes that if these improvements are carried out, in overall landscape and visual terms, the proposed impact of the development is considered to be 'slight'. The landscape architects state that this would be due to the improvements to the existing buildings and the proposed mitigation measures that form an integral part of the development proposals, thus improving how the development is seen within the existing landscape.

7.40. In response to the recommendations in the Landscape and Visual Appraisal the applicants state as follows:

- *The applicant contacted Technical Paint Services in March 2018 to determine whether painting the existing roofs would prevent solar glare. In summary, the paint specialist confirmed that due to the pitch of existing roofs there will always be solar glare with every colour of paint. Painting the roofs black may help but it is not guaranteed and would result in heat gain in the buildings and may not last long depending on roof movement.*
- *The applicant has also investigated whether an artificial green roof system could be retrofitted to the roofs. Unfortunately, they have not been able to find a product that does not compromise the structural integrity of the existing roofs.*
- *The Appraisal recommends RAL colours and I can confirm that the applicant's preferred colour is RAL 6003 Olive Green.*

7.41. In the light of these comments and the offer from the applicants to paint the existing buildings on the site, it is considered that there would be an overall improvement in the appearance of the buildings on the site and that they would appear less prominent when viewed from the north-east. The two new buildings would be viewed in the context of the dark olive green buildings on the site and the mature trees located to the south-west of the site, behind the buildings in the relevant view. It is considered therefore that the proposals take account of their impact on the landscape in accordance with Mole Valley Local Plan Policy ENV23.

The impact of the proposals on the amenities of local residents

- 7.42. Criterion 2 of Local Plan Policy ENV22 requires new development to not significantly harm the amenities of the occupiers of neighbouring properties by reason of overlooking or its overshadowing or overpowering effect, noise, traffic or other adverse environmental impact.
- 7.43. The closest residential properties to the application site are located on Hawks Hill to the south-west of the site, and on the opposite side of the road. The closest properties, Lower Ridge and Rame Cottage to the south west would be over 100m away from the proposed Dosing Building with existing buildings on the site, mature trees and fencing in the gap between. The proposals would not therefore have an adverse impact on the amenities of neighbouring properties by reason of overlooking or overshadowing or an overpowering effect.
- 7.44. A number of the objections received raise the issue of noise from the facility and consider that this noise adversely impacts on their amenities. In response to these objections, and also following a request from the Council's Environmental Health Officer, the applicants submitted a Noise Impact Assessment. This has been reviewed by the EHO who states that based on the information submitted Environmental Health would support this application as providing a reduced noise impact on the local environment compared to the existing facilities. However in order to ensure compliance and betterment for the final installation, it is recommended that a condition be imposed which acknowledges the work carried out while also giving a minimum standard of compliance of 5db below the current noise levels. A condition is recommended below in order to achieve this.
- 7.45. A number of objections also raise the issue of the storage of large amounts of chemicals on the site. In response to these objections the applicants have provided the Council with the following statement.

Chemicals have been used and stored onsite at Elmer Water Treatment Works (WTW) since its construction in 1935 and are required to treat the abstracted water from local abstraction boreholes. The small inventory of chemicals stored onsite is primarily required to provide a buffer due to variability in the rate of chemical consumption caused by two factors – changes in raw water quality, and variability in the output from the site (ranging from 30 million litres per day to 65 million litres per day). This buffer also protects the site operation from the potential for short-term interruptions in the supply-chain, which can happen from time-to-time. Frequency of deliveries vary but is on average, three to four weeks between deliveries.

Chemicals are not stored offsite as it would increase the risks associated with multiple handling of bulk chemicals, increases vehicle movements associated with the operation, and adds significant cost to the process from both a storage and transportation perspective.

*It should be noted that the proposed development **will not** increase the size of the chemical inventory currently onsite. This application ensures that SES Water holds the chemicals in a safe and secure manner in accordance with the following regulations and guidelines:*

- *The Water Supply (Water Quality) Regulations 2016*
- *The Water Supply (Water Fittings) Regulations 1999*
- *Control of Substances Hazardous to Health 2002*
- *HSG28: Safety Advice for Bulk Chlorine Installations*

- *HSG40: Safe Handling of Chlorine Drums and Cylinders*
- *HSG71: Chemical Warehousing*
- *HSG76: Warehousing and Storage*
- *HSE L22: Safe use of work equipment. Provision and Use of Work Equipment Regulations 1998*
- *HSE REACH (Registration, Evaluation, Authorisation & restriction of Chemicals) Regulations*

7.46. In the light of these comments it is considered that the proposals would not adversely impact on the amenities of local residents and accord with the provisions of part 2 of Local Plan policy ENV22.

Highways issues

7.47. The proposals include the provision of an internal access road located to the west of the existing buildings. The site is served by two accesses which serve the north and south of the site. There is currently no formal link road within the site which results in vehicles having to leave the site and travel via Hawk's Hill to gain access to the other part of the site. The applicants state that this is not operationally efficient and poses a security risk as the gates need to be continually opened and closed. The proposed internal access road will run southwest to northeast and connect to the existing northern and southern internal roads. This would enable vehicles to travel around the site without the need to exit and re-enter via Hawk's Hill. This would remove these short journeys from Hawk's Hill and be of benefit operationally and for on-site security.

7.48. The proposed development would not result in a change in the number of vehicles serving the site, the number of employees on site or the operational hours of the site. As such, there would be no adverse impacts on traffic and transport. It is therefore considered that the proposed development complies with policy MOV2.

The impact of the proposals on trees

7.49. The proposed access link road would be located in the north-western portion of the site which is open but features a number of mature trees. The Tree Development Report which accompanies the application identifies 18 individual trees and 2 groups of trees in the western section of the site.

7.50. The proposed access link road would result in the loss of three individual trees, namely T1, a semi-mature beech, T13, a semi-mature sycamore and T17, a semi-mature Norway maple and 1 group of trees, G19, a pair of Lawson cypress trees.

7.51. The applicants propose to replace these trees with six additional trees in a mix of species, including field maple, hornbeam and beech, in locations close to the new access link road. To ensure the replacement planting takes place, a condition is recommended.

7.52. The Council's Tree Officer has reviewed the proposals and does not raise any tree related concerns or objections to the proposals in principle or on policy grounds.

Other matters raised in objections

7.53. A number of the objections state that the applicants should examine the feasibility of locating the proposed buildings underground. In response, the applicants have provided the following statement:

It is not possible to locate the buildings underground on any part of the site without encountering existing subterranean and operational structures, or excavating significant parts of the remaining site to provide access ramps to the underground structures to allow deliveries to be unloaded within the buildings. This would significantly increase the amount of hardstanding onsite.

- 7.54. The issue of lighting on the site has been raised by a number of objectors who raise the issue of glare from lights across the valley. No details have been submitted of additional lighting on the site, nor of the provision of existing lighting and it is considered that a condition should be imposed requiring the submission of details for any additional lighting on the site.

8. Conclusion

- 8.1. The proposals are not considered to comprise inappropriate development within the Green Belt. The proposals comprise limited infilling or the partial redevelopment of a previously developed site which does not have a greater impact on the Green belt and therefore accords with the advice in paragraph 89 of the National Planning Policy Framework.
- 8.2. Notwithstanding this, the applicants have demonstrated a need for the development in order to maintain the supply of clean potable water to their customers.
- 8.3. It is recognised that the buildings on the site are visible in views from south Leatherhead and in recognition of this, the applicants have proposed to paint both the proposed buildings and existing buildings on the site a dark olive green in order to mitigate their impact in long distance views. It is considered that these measures would help to reduce the impact of both the proposed buildings and existing buildings on the visual amenities of the area.
- 8.4. The proposed development would also provide for improvements to the safe storage of the chemicals on the site, and improvements to the noise environment around the site. It is considered therefore that there would be an improvement in the amenity of residents around the site.
- 8.5. Although a number of trees would be removed to facilitate the new access link road, a greater number of replacement trees would be planted to compensate for the losses.
- 8.6. In the light of these comments it is considered that the proposals comply with national and local planning policy and it is recommended that planning permission be granted, subject to conditions.

9. Recommendation

Permission be GRANTED subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91(1) of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out and completed in all respects strictly in accordance with the submitted documents and Plan Schedule dated 21st May 2018 and the annotated drawings contained therein and no variations shall take place.

Reason: To accord with the terms of the submitted application and to ensure minimal impact on local amenity and the environment in accordance with Mole Valley Core Strategy policy CS14 and Mole Valley Local Plan policy ENV22.

3. Before any above ground works commence, details of the materials to be used in the construction of the external surfaces of the development hereby permitted, including the precise colour of the paint to be used on both existing and proposed buildings, shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: To ensure the development harmonises with its surroundings in accordance with Mole Valley Local Plan policy ENV22 and policy CS14 of the Mole Valley Core Strategy.

4. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.

Reason: The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted, and the site covers a large surface area in which it is considered necessary to preserve as a record any archaeological information before it is destroyed by the development in accordance with Mole Valley Local Plan policy ENV50 and policy CS14 of the Mole Valley Core Strategy.

5. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A site investigation scheme, based on the Phase 1 report, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

- 2) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: For the protection of Controlled Waters. The site is located over a Principal Aquifer & within Source Protection Zone 1 and it is understood that the site may be affected by historic contamination.

6. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

7. Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

8. Prior to the commencement of the development hereby permitted, surface water drainage details shall be submitted for the approval in writing by the Local Planning Authority. Such details shall include an assessment of the potential for the disposal of surface water by means of a sustainable drainage system in accordance with the principles set out in the National Planning Policy Framework.

The assessment shall provide information of the design storm period and intensity (typically a 1 in 100 year storm of 30 minutes duration with an allowance for climate change), the method employed to delay and control the surface water discharged from the site and the means to prevent pollution of the receiving groundwater and/or surface water. Where applicable, the details shall include infiltration tests, calculations and controlled discharge rates. If the development is to discharge water into the ground in any form, then a full BRE Digest 365 infiltration test (or falling head test for deep bore soakaways) will have to be submitted to the Local Planning Authority prior to commencement of any works on site. The suitability of infiltration methods should be verified (i.e. possible contaminated ground).

The approved drainage scheme shall be implemented prior to the first occupation of the development.

Reason: The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that

without this safeguard planning permission should not be granted and, in the interests of sustainable development, in accordance with the advice contained in the National Planning Policy Framework and policy CS20 of the Mole Valley Core Strategy.

9. Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Reason: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

10. No development shall commence until a Construction Transport Management Plan, to include details of:
- (a) parking for vehicles of site personnel, operatives and visitors
 - (b) loading and unloading of plant and materials
 - (c) storage of plant and materials
 - (d) programme of works (including measures for traffic management)
 - (e) provision of boundary hoarding behind any visibility zones
 - (f) HGV deliveries and hours of operation
 - (g) vehicle routing
 - (h) measures to prevent the deposit of materials on the highway
 - (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
 - (j) on-site turning for construction vehicles
- has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with the National Planning Policy Framework, the Surrey Transport Plan, and saved polices MOV2 and MOV5 of the Mole Valley Local Plan.

11. Prior to the commencement of any construction works:
- (a) Tree protective fencing shall be erected and maintained in full around each tree or tree group to be retained in the vicinity of the development operations, in accordance with the recommendations for tree protection areas given in the current British Standard 5837 (Trees in relation to design, demolition and construction) and as indicated on approved drawing [number] unless otherwise agreed, in writing, by the Local Planning Authority.
 - (b) No burning shall take place in a position where the flames could extend to within 5 metres of foliage, branches or trunk of any tree or group to be retained on the site or land adjoining having regard to the size of the fire and wind direction.
 - (c) No trenches, pipe runs or drains shall be dug within 4 metres of the trunk of any trees retained on the site or land adjoining unless agreed otherwise, in writing by the Local Planning Authority; and all such installations shall be in accordance with the advice given in National Joint Utilities Group Publication Number 10.

(d) No materials, plant, machinery or structure shall be placed or operated within the tree protection area nor at any time shall alterations to ground levels be carried out unless otherwise agreed, in writing, by the Local Planning Authority.

Reason: In the interests of visual amenity and to ensure the retention of trees which enhance the existing character of the locality in accordance with Mole Valley Local Plan policies ENV25 and ENV53, and Mole Valley Core Strategy policies CS14 and CS15.

12. The landscaping scheme indicated on the approved plans shall be carried out in the first planting season after commencement of the development, unless otherwise agreed in writing by the Local Planning Authority, and shall be maintained for a period of 5 years. Such maintenance shall include the replacement of any trees and shrubs that die.

Reason: To ensure the provision and maintenance of trees, other plants and grassed areas in the interests of visual amenity and in accordance with Mole Valley Local Plan policy ENV25 and policies CS14 and CS15 of the Mole Valley Core Strategy.

13. No floodlights or other forms of external lighting shall be installed on the site.

Reason: To protect the amenities of the locality, including the amenities of neighbouring residential properties, in accordance with Mole Valley Local Plan policy ENV57 and policy CS14 of the Mole Valley Core Strategy.

14. Any new or altered hard surfacing to be provided on the site shall be constructed from either porous materials or shall make adequate provision for the direction run-off from the hard surface to a permeable or porous area.

Reason: To prevent the increased risk of flooding, in accordance with Mole Valley Local Plan policy ENV25 and policies CS14 and CS20 of the Mole Valley Core Strategy.

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

Reason: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

16. The recommendations set out within the applicant's ecological survey (CH2M Hill Inc dated August 2017) and submitted in support of the application shall be carried out in full before the development is occupied.

Reason: To safeguard the ecological interest of the site in accordance with Mole Valley Local Plan policy ENV15 in accordance with policy CS15 of the Mole Valley Core Strategy and the National Planning Policy Framework.

17. Noise from any mechanical equipment or building services plant shall comply with the environmental noise targets and performance criteria specified in the AECOM noise report reference 60506231 dated February 2018 and as a minimum when installed shall be no more than 5db below the relevant background noise levels when measured at the specified noise monitoring locations detailed in Table 6 of the report, when measured as a L90 dB(A) 1 hour.

Within 1 month of the date of commissioning all equipment and plant hereby approved a noise assessment shall be carried out to confirm the noise target has been met for both day and night time operation. Any additional steps required to mitigate noise shall be detailed and implemented, as necessary. The post installation noise assessment shall be submitted to and approved in writing by the local planning authority. The details as approved shall thereafter be permanently retained.

Reason: To protect the amenity of the local area and ensure a satisfactory environment for neighbouring properties in the area of the new development in accordance with Mole Valley Local Plan policy ENV22 and policy CS14 of the Mole Valley Core Strategy.

Informatives

1. As the proposed application site is adjacent to Network Rail's operational railway infrastructure, Network Rail requires the developer to sign asset protection agreement with Network Rail Asset Protection team prior to commencement of any design and construction works on site.