

Egham Residents' Association

To: MWCD@surreycc.gov.uk

Sian Saadeh, Planning Development Manager, Surrey County Council (SCC)

Re: Planning application **SCC Ref RU.21/0597** (Whitehall Farm, Stroude)

Tuesday 30/1/2024

Dear SCC Planning Development Manager,

The Egham Residents' Association (ERA) strongly objects to this planning application, Ref RU.21/0597, for gravel extraction and processing at Whitehall Farm, Stroude.

The activities proposed under the application would be egregiously harmful to residents of Egham through their detrimental effects on air quality, excessive traffic, exacerbation of flooding, industrialisation of Green Belt land neighbouring our town and, as a consequence, destruction of a rare remnant of the natural Thames flood-plain. We are entirely unconvinced that these harms are outweighed by any potential benefits.

ERA is part of the RAGE umbrella group (Residents Against Gravel Extraction) and we share the concerns that RAGE and its other component Residents' Associations are expressing. We also note that the application is contrary to a number of policies recently adopted by Runnymede Borough Council (RBC), and we support the objections to the application that RBC has submitted. We trust that SCC will heed these submissions made in representation of 100s-1000s (the Residents' Associations) and 1000s-10,000s (the RBC) of individuals that would be adversely affected by the gravel workings.

Air quality and undesirable health impacts

The application has not adequately considered the impact of the development on air quality, and there is a failure to take the cumulative air quality impacts into account, in spite of there being a fair and reasonable expectation that other developments will come to fruition during the working life of operations at Whitehall Farm. This is contrary to RBC policy which seeks to protect the borough from development proposals which may give rise to adverse impacts on air quality (see RBC response for detail).

Homes in the immediate vicinity of the gravel working would very likely to be affected by the fine, micrometre-scale, silicon/silicate particulates (PM_{2.5} and PM₁₀) that are known to be health hazards; long-term exposure can lead to cardiovascular and lung diseases. Ground disturbance for gravel digging and processing over multiple years, which the application seeks, might reasonably be expected to lead to long-term exposure to these fine particles.

Separately, the route for lorries that would bring gravel away from the Whitehall Farm site, and later would transport material to infill the site, runs through an AQMA, passing as it does parallel to the M25 on Vicarage Road, Egham, crossing the commonly traffic-jammed Pooley Green level crossing, and thence taking busy The Avenue, Egham, towards the M25 at Junction 13. This route has long suffered from excessive nitrogen oxides (Nox pollution in street-level air), which would undoubtedly deteriorate further over the 8+ years that the Whitehall Farm site would be worked. The Nox-related health-damaging effects would be compounded if the Thorpe Lea Road housing development is constructed at the same time as this gravel working.

In respect both of Nox and PM_{2.5}/PM₁₀ air pollution, we have a particular concern for the health impacts on Egham's primary school children at Manorcroft School which itself straddles the AQMA boundary and lies barely 1 km from the proposed quarry site. Hence Air Quality is the no. 1 reason for our objections to the application.

Traffic

The impact of the development on the local highway network, including the impact on Whitehall Lane during the construction phase of the quarry, has not been adequately considered, and no measures are

identified to mitigate the impacts to acceptable levels. This is contrary to policy in the RBC Local Plan (see RBC response for detail). Additionally, the application fails to acknowledge the cumulative highway impacts, when there is a fair and reasonable expectation that other developments will come to fruition during the working life of operations at Whitehall Farm.

During operation, there would be an estimated 74 haulage journeys departing the quarry site per day. Counting the empty returns as separate journeys, this adds up to 148 heavy (20/30 tonne) lorry movements per day for over 7 years. As described above, the 'preferred' route for gravel haulage takes the gravel-laden lorries along Egham's Vicarage Road, across the railway line at the frequently traffic-jammed Pooley Green junction, and thence along Egham's The Avenue, *en route* to the M25 at Junction 13. Traffic at Pooley Green level crossing is already at full capacity according to the RBC Strategic Highway Assessment Report, and there's a distinct possibility that construction for 144 dwellings at Thorpe Lea Road (RBC RU.21/0192) will be in progress at the same time as the gravel-raising. Vicarage Road and The Avenue are both residential roads. The residents, together with the almost continuous file of pedestrian users (including Egham school-children to/from Magna Carta School and Egham residents to/from The Orbit Sports Centre and Cricket Club) already suffer from heavy traffic along this corridor of polluted air. The road-users themselves already suffer from congestion and excessive waits at the level-crossing, with tail-backs commonly reaching back to The Avenue in one direction and the Cricket Club in the other. Residents in roads off Vicarage Road and The Avenue already describe the anxiety induced by ground vibration caused by haulage lorries on the main road, and the nuisance of stagnant traffic blocking access from the side roads to the main road. An additional 148 lorry movements per day would be an excessive burden on the lives of the residents in this part of Egham.

Separately, residents in Egham's Whitehall Lane are rightly concerned at the proposal that construction traffic should use what is essentially a country lane during the first year of the project, particularly as this construction may happen at the same time as construction work at the student village at Rusham Park, yet no consideration has been given in the application of the potential cumulative effects, as is required.

Flooding

The impact of both the development and the subsequent restoration of the site upon hydrology (including groundwater flow, effects upon the watercourses and surface runoff) has not been adequately considered. This includes (a) failure to demonstrate that the works would not result in water-logging and subsidence to local properties as a result of changes to groundwater conditions, and (b) failure to demonstrate that the development would not compound the impact of an increase in intensity of rainfall associated with climate change, such that increased surface water runoff would cause flooding of properties. These failures are contrary to the RBC Local Plan policy (for detail see RBC response), which states that development must not materially impede the flow of flood water and must not reduce the capacity of the floodplain to store flood water; they are also against RBC Local Plan's objective to increase resilience to climate change, including flood risk.

The Whitehall Farm site lies directly adjacent to Egham Hill, along the base of which there are numerous springs and associated water-logging. Rainfall under these conditions (and there is evidence for intensification of rainfall) threatens flooding of properties close to the hill both by rainfall-runoff and by groundwater, ie between the proposed quarry site and the south-west corner of Egham including residencies at the end of Whitehall Lane. Removal of volumes of gravel, and in-filling with less-permeable material, would reduce the storage capacity of the floodplain, and therefore risks raising the water table sufficiently to flood gardens and the inside of properties at the west end of Whitehall Lane and elsewhere, particular in the aftermath of heavy rainfall.

But inexplicably and inexcusably, the application discounts flooding as an issue of concern, and reduces itself to qualitative assertions (minimal, small, marginal, and the like). We contend the opposite: that flooding is a real and serious potential outcome of the application. At the very least it should be incumbent on the applicant to support their assertions through a quantitative assessment of the surface and groundwater hydrological impacts. Against these real risks of groundwater flooding, the application for an adjacent gravel quarry at Milton Park Farm was rightly supported by a numerical groundwater flow

model. The Whitehall Farm site is closer to floodwater sources and more vulnerable to flooding from the direction of Egham Hill. The application is entirely deficient in this regard.

Green Belt, and Landscape value

The Whitehall Farm site lies on Green Belt land on the edge of Egham, between Egham and Virginia Water – land which provides a precious rural barrier against the coalescence of the two communities and a breathing space for residents of both to enjoy. The quarrying and gravel processing would have the effect of industrialising this rural space, destroying its tranquility, and restricting walkers to specific paths bordering the quarry/processing areas.

Quarried land forever loses its original defining characteristics. In the case of Thames floodplain, the dead-level flatness and tendency towards water-logging produces characteristic environments and habitats justifying recognition by Natural England as the Thames Valley National Character Area (NCA) for which there is “virtually no undisturbed” remnants. The quarrying and restoration described in the application would forever destroy this rare pocket of Thames floodplain.

Need: what demand for gravel?

The application is entirely silent on the locus and timescale for demand of gravel, which we understand is a requirement in applications for mineral extraction. In this context, we note that the Surrey Minerals Plan 2011 is now twelve years old, in many respects is out of date, and no longer provides an adequate regulatory context.

In conclusion and in consideration of the reasons for objection given above, on behalf of the residents of Egham, we petition the SCC to reject the application Ref RU.21/0597 for gravel extraction and processing at Whitehall Farm, Stroude.

Yours sincerely,

William Burgess
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