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Table 1 – General Comments

Unique ID Reference	Summary of Issue	Response
WR8	There is no mention of Environmental Impact Assessment, and the proposed Minerals and Waste Local Plan seems to rely heavily on National Planning Policy Framework 2021 guidance for any protection against noise, dust and lighting. Given the potential impact in this area, this seems inadequate, and we would support a separate environmental protection policy to cover these aspects in more detail.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR8	The proposals refer to the environmental protection afforded by policies in the Surrey Minerals Plan 2011 and Surrey Waste Local Plan 2020 - The Surrey Waste Local Plan 2020 includes two policies (13 and 14) that address the issues of green infrastructure provision and the management of nuisance. The Surrey Minerals Plan 2011 includes two policies (MC14 and MC18) that address the issues of green infrastructure provision and the management of nuisance – however these documents are to be replaced by the Minerals and Waste Local Plan and it is not clear if those policies will be carried forward.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR8	It is acknowledged that for certain types of waste management facilities where the wastes are organic, odour can be a concern, however, there are no proposals for protection against this and odour should be included in any Environmental Protection policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR8	There is no mention of the existing Surrey County Council Guidelines for Noise and Vibration Assessment and Control Minerals, Waste and Other County Development January 2020, how the new Minerals and Waste Local Plan will link to this or whether it will supersede it.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR8	It should also be noted that the national noise guidelines for mineral operations could still result in significant adverse impact if applied to new operations in rural areas with very low background noise levels. Waverley Borough Council would like to see applications considered on a case-by-case basis having regard to the background noise in an area so developments do not result in any adverse impact, and any necessary noise mitigation measures are adopted where appropriate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR8	There is no mention of vibration and the potential adverse impact this can have. This should be included in any Environmental Protection policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR13	Supports those options which seek to maximise the benefits on the natural environment and our communities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR49	Regarding air quality, water, land and soils and nature (other than restoration specific policy) considers it is difficult to comment on the options for these topics, because unlike 'restoration' policy, there are no tangible comparable options described e.g. differing levels of ambition or different approaches. They just talk about whether the current approach should be maintained (with much explanation of the implications) or whether a new policy/policy should be developed, and if so should there be combined or individual policies for the topics.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR54	Notes the argument in "key issues" of Section 7, which is repeated from earlier in the consultation, is that as most of Surrey is Green Belt and that as minerals can only be extracted where they are found, it is inevitable that some workings will be permitted in the Green Belt. In earlier sections the argument has run (I paraphrase) "whilst we recognise the importance of Green Belt, Area of Outstanding Natural Beauty etc. and other designated landscapes, we must facilitate mineral extraction in the National Interest". Are not the very designations of landscape as Greenbelt, Area of Outstanding Natural Beauty etc. an indication that the landscape itself is of "National Importance"? Once it is destroyed by mineral extraction the precise landscape can never be replaced; as your document makes clear, the current lack of inert waste for infilling means that rarely can the topography of an extracted area be reinstated.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 2 – Green Belt Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
WR12	Selected this option without justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers that the Green Belt is needed as it helps with pollution and that brownfield sites should be built on instead.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that option 2 presupposes that hydrocarbon development will take place. Also comments that once lost Green Belt cannot be recovered, highlights its importance, and asks why it is being threatened?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	This would provide a clear and unambiguous framework for subsequent planning applications. It is also suggested that examples of what might constitute the very special circumstances which could facilitate waste development in the Green Belt, should be included within the supporting text.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR51	States minerals extraction is identified in the National Planning Policy Framework 2021 as being appropriate development within the Green Belt. This should be kept separate as other waste management uses are inappropriate and a different approach could lead to a conflation of what are different issues.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 3 – Green Belt Option Two “Update the existing policy approach to reflect guidance on ‘inappropriateness’.”

Unique ID Reference	Summary of Issue	Response
CR6	The present system is abused by companies and by Surrey County Council who have a vested interest in creating brownfield sites.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	Considers that the current policy is not working as it allows mineral extraction and waste processing in sites close to residences and schools, leading to possible health issues.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	Considers that policy needs to ensure no mineral extraction or waste processing within 1000 metres of homes and schools.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR18	Considering the climate emergency there needs to be a total rethink moving forwards in a sustainable way that benefits all.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Non-renewable extraction and waste planning needs to be dealt with at a national level with local authorities given adequate resources to make positive change.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR36	Ensures consistency of approach. Also considers that there should be provision for cycle paths and other green transport options and assessments of alternative site accesses to avoid pressure of additional Heavy Goods Vehicle movements on the Green Belt and residents.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR43	All policies should be reviewed to ensure compliance with latest national policy and guidance. Comments that 10% biodiversity net-gain will become a statutory requirement during the Plan's development period and considers it is as yet unclear how onerous this will prove to be on development. States that each site has its own specific characteristics, and the Department for Food and Rural Affairs biodiversity net-gain metric may not be the most appropriate mechanism for measuring the biodiversity value delivered by a quarry restoration scheme. Whilst quarry restorations can present an opportunity for creating significant biodiversity value, considers that simply requiring a higher biodiversity net-gain percentage for certain types of development would be an unfair approach.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50, WR33	Considers that policy should be updated to reflect the National Planning Policy Framework 2021 and separate out appropriate minerals development that is not permanent.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Appropriate to devise policy based on development types in terms of appropriateness in the Green Belt, regardless of whether that it is minerals or waste, and for the policy to be up to date in regard to National policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	A single minerals and waste plan is to be prepared. Considers that it would potentially better allow for the policies to be better tailored to the differing types of minerals and waste development if there are differing issues that need addressing through policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59, WR44	As minerals are identified in National Planning Policy Framework 2021 as being appropriate development within the Green Belt, they should therefore be treated independently within policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR13, WR16	It would provide for a specific and separate policy concerning mineral extraction, given that it is not inappropriate provided it preserves openness and does not conflict with the purposes of including land within it, and so requires a different policy approach than waste.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR20	Selected this as it is more specific than option 1. States it is difficult to decide between the two options without knowing more about the policies they contain.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers this would provide policy clarification in line with the National Planning Policy Framework 2021 to distinguish between development which is deemed 'inappropriate' and that which is not i.e., mineral extraction, where the requirements with respect to openness and purposes of the Green Belt can be met.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Difficult to decide without more information, but option 2 may be more helpful as some of the issues differ between waste and minerals.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Considers it is likely to ensure the best development management outcomes. However, considers there should be more than two detailed policies as separate consideration of the full range of development options would better ensure optimum management outcomes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	It would allow the Minerals and Waste Local Plan to align with national planning policy concerning inappropriate development in the Green Belt and reduce the need for applicants or developers to have to interpret two different types of Green Belt policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR48	It would provide for the guidance to be updated to reflect guidance on 'inappropriateness' and allow for an appropriate level of guidance to specifically address mineral extraction including surface mineral workings and hydrocarbon development (exploration, appraisal, and extraction).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR52	States that the need for clarity between minerals and waste development is essential. Highlights the Samuel Smith case law, regarding what is or is not to be taken into account in assessing the impact of mineral development on the Green Belt.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 4 – Green Belt Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	The plan should take account of the Rights of Way improvement plan and consult with the statutory advisor on recreation and the rights of way Local Access Forum.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	Green Belt is sacrosanct and cannot be truly restored in the medium-term after it has been damaged. Considers that the use of Green Belt land for mineral extraction is unacceptable and should only be considered as a last resort.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Green Belt protection was put in place for a reason and needs to be protected, with a rethink needed regarding housing, empty properties, the redevelopment of office space and funding for community projects. Considers that building contractors should use renewable materials in builds such as timber.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR39	Did not select an option as considers there is insufficient evidence to, but commented that updating the policy sounds sensible, but that there is not enough explanation about how 'inappropriate' is interpreted.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR50	Flexibility, mainly for waste, will be required to provide future waste facilities as there is a lack of available sites in the urban areas.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	There should be greater protection for prioritising amenity over assumption of extraction e.g., stronger definition of very special circumstances for development on Green Belt, countryside beyond the Green Belt and/or Area of Outstanding Natural Beauty and Area of Great Landscape Value.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	It is unclear what the intent of separating Green Belt policies is, but another approach may be where some specific protection is applied with assumed denial of development on the Green Belt and more protection of countryside beyond the Green Belt is included.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR5	The need to protect the overall purpose and integrity of the Green Belt is of paramount significance. The strict controls for the use of Green Belt land for development as set out in the National Planning Policy Framework 2021 should continue to apply. In particular, the requirements of paragraphs 143 to 146 should be adhered to when selecting sites for waste management development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR6	If the county's mineral needs do have to be met entirely or largely from within the county every effort must be made to minimise the impact on the Green Belt and 'front line' communities which have already suffered from this and other forms of development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR9	Green Belt land should be protected whenever possible and an alternative solution for mineral extraction or waste management should be sought.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR16	States minerals extraction is a temporary activity with temporary impacts. Progressive and final restoration provides the opportunity to return the land back to its pre-development condition or, in many cases, to achieve improvements in terms of nature conservation, recreation, landscape and other ecosystem services. The impacts on purposes of Green Belt and on openness can be mitigated through design and implementation, of both operational and restoration phases.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR18	Rail aggregate depots within the Green Belt are not inappropriate development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR20	Concerned about erosion of the Green Belt.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR37	Unclear on the Green Belt options suggested – any deviance from National policy will find the plan unsound. The options are to remove certain sites from the Green Belt to deliver waste management facilities or to indicate how very special circumstance for waste facilities may be justified/met and the types of considerations that the county is likely to consider. For example, location of facility in close proximity to waste source or supply chain. Lack of alternative suitable sites.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	States that it will be necessary to allocate waste sites in the Green Belt and that Tandridge Borough Council have concluded that there are exceptional circumstances to justify removing Lambs Business Park from the Green Belt.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	States the argument on appropriateness should be considered separately for waste and minerals due to their different impact on the greenbelt, and especially their permanence. Appropriateness should be considered separately depending on the length of the time Green Belt is affected – distinguishing between temporary use of land for quarrying from industrialisation through establishing a waste management facility.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	States option 2 should be considered separately for different types of development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR51	Acknowledges the need for working minerals where minerals are found and often these are located within Green Belt. However, has severe concerns over the number of other waste management uses that are granted permission in Green Belt or extensions to mineral extraction sites where this is no longer the primary activity. The issue of inappropriate development being granted consent on current extraction sites is one that has proven difficult and a clearer approach to the separation of these two matters is essential for a robust policy on Green Belt and appropriateness to be formed to support the Plan. Included within a policy should be recognition that this distinction exists and that where a site has consent for mineral extraction this should not mean that other waste management uses would be appropriate. The National Planning Policy Framework 2021 makes clear that minerals supply should be maintained however this should not be used as a means of extending the use of such sites with waste management uses and using this as justification for very special circumstances. Once the extraction has ceased then the Policy should tie this end date with the restoration to be completed within a set period of time rather than leave open scope for alternative uses to take place where extraction is no longer being undertaken or is the main use of the site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 5 – Restoration ‘Biodiversity Net Gain’ Option One “All site restoration or enhancement schemes deliver at least 10% biodiversity net gain.”

Unique ID Reference	Summary of Issue	Response
CR43	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	The Department for Food and Rural Affairs biodiversity net-gain metric was designed for housebuilding and does not reflect longer-term minerals development. Considers it is too heavily weighted to short term gains and does not deliver for species, and that this will lead to a system that delivers inappropriate quick wins. Considers that as 10% gain will be legal requirement it should remain the target for now until the system is proven.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that whilst 10 per cent net gain is the mandatory requirement under the Environment Act, it seems sensible to include a requirement that can make a real difference to wildlife and habitats and to contribute to the wider local policy aims for biodiversity in the county. Comments that restoration sites can be large areas offering real potential for improvements for biodiversity in a unique way. Also comments that options 2 or 3 are worth further consideration.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59	Consistent with the requirements of the Environment Act. Considers that it is not appropriate to apply a greater percentage as other forms of development will be put at an advantage over minerals development, and that minerals should not be treated any differently to other forms of development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR16, WR33, WR44	<p>Requiring restoration or enhancement schemes to deliver at least 10% biodiversity net gain would be consistent with the requirement and mandatory approach introduced in the Environment Act. This will not become mandatory until late 2023 when secondary legislation is expected to be in place. Requiring more than 10% net gain for minerals specifically, if not applied to other types of development, would not provide the 'level playing field' that the Department for Food and Rural Affairs and Natural England are advocating through the use of the metric. 10% net gain would clearly deliver significant biodiversity benefits including in the broader 'host' area (whatever that is) and requirement for a higher percentage is not justified. Restoration of mineral sites has a long and demonstrable history of delivering substantial biodiversity gain, along with wider benefits.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR23	<p>Consistent with the Environment Act (with further requirements to be set out in secondary legislation). On behalf of its members, the Mineral Products Association has been engaging with the Government as the legislation has progressed, including with respect to limitations of the Department for Food and Rural Affairs biodiversity net-gain metric as a tool to calculate and demonstrate compliance with the requirement to deliver biodiversity net-gain on mineral sites. The minerals industry has long provided enhancements through progressive restoration and longer-term management; this is evidenced by mineral operators' track records at sites in Surrey and across the UK. Adherence to rigid process should not risk jeopardising such future gains. We would support the Mineral Products Association's position in response to this question.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR45	<p>Support a 10% threshold to comply with National requirements. Unclear how pre-development biodiversity value will be calculated as many sites have been in operation for a long time.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 6 – Restoration ‘Biodiversity Net Gain’ Option Two “All quarry restoration schemes deliver at least 20% biodiversity net gain; and all other site restoration or enhancement schemes to deliver at least 10% biodiversity net gain.”

Unique ID Reference	Summary of Issue	Response
CR36	There should be a comparable policy for other development such as housing.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR18	Highlights that option 3 mentions ‘offsetting contributions’ which will not necessarily benefit the site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 7 – Restoration ‘Biodiversity Net Gain’ Option Three “All quarry restoration schemes deliver 20% biodiversity net gain over the site baseline and a further net gain of at least 10% to create additional headroom within the host area; and all other site restoration or enhancement schemes deliver at least 10% biodiversity net gain.”

Unique ID Reference	Summary of Issue	Response
WR6	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers that the most improvement possible should be achieved, and that there should be 100% restoration.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR23	The cost to contractors of minerals extraction needs to be high enough that sites are only operated when there is no alternative, due to impacts from extraction.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR18	Considers that it gives the highest level of biodiversity after restoration, though states that they would rather see the land kept due to its underlying geology and biodiversity.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR46	Considers that there is a need to maximise biodiversity gain to replace what has been lost. States that they do not like offsetting.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Considers that biodiversity net gain on all restoration schemes should be maximised as far as possible given the recognised global decline in biodiversity and the important role that minerals restoration could play in contributing to the improvement and enhancement of local ecological networks across Surrey.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Considers that a standard metric to establish baseline should be imposed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR13	Considers this option the most likely to secure meaningful benefits to biodiversity to the benefit of the natural environment and our communities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR20	Considers this would support broader biodiversity benefits.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	In principle the more net gain the better, but if a site is already biologically diverse or if the site is for waste management, it is likely to be far more difficult to achieve a higher net gain solution. If an acceptable improvement cannot be achieved, perhaps the wrong sites have been chosen.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR31, WR40	Has the largest biodiversity gain and would support the greatest biodiversity benefits.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR51	<p>Selected this to secure maximum betterment where possible in order to contribute to biodiversity net gain. Comments that the incorporation of timings for restoration schemes will be important to ensure effective mechanisms in achieving biodiversity net gain benefits. This will be important as there is scope for suitable restoration schemes to connect with other proposals for enhancing green and blue infrastructures and improving biodiversity across the relevant borough area. By having a more joined up approach, this could allow for greater scope in achieving meaningful biodiversity net gain rather than having piecemeal areas which meet the minimum 10% but lack the ability to provide for tangible benefits. Consideration of the wider area around the worked site would assist with this and on-going engagement with the requisite local authority should allow for these opportunities to be further exploited. Further to this, several restoration schemes have been implemented in Spelthorne which involve the filling of worked land with water. Whilst this approach has had benefit for local bird populations and other ecological drivers, the proximity to Heathrow does present an issue over potential bird strike impacts. This, given the loss of physical land through such schemes, means that restoration schemes which are primarily water-based would likely not be supported. Keen to engage with Surrey County Council and mineral companies to agree to suitable schemes which benefit net gain and contribute to the wider Green Infrastructure network. A policy approach which included opportunities to devise suitable schemes through enhanced collaboration to secure benefits for the borough would be supported and encouraged.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR53	<p>States that this option should actively ensure biodiversity net-gain proposals can be delivered on and off site.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 8 – Restoration ‘Biodiversity Net Gain’ Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	Didn't select an option for the delivery of biodiversity net-gain through restoration, as considers that this is not relevant to most planning decisions, and that the key is to return the sites to their original use. Considers that net gain can be dealt with after the site has been returned to its original agricultural, forestry or horticultural use, and that it is not for waste and minerals planning to engage in granting planning for alternative uses after restoration.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR9	No offsetting should be allowed as planting in other locations does not help local wildlife.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR23	Considers that there needs to be an independent body that assesses biodiversity and the reinstatement and improvement of sites. Expresses concern that the operator currently assesses the level of biodiversity before an application and after extraction. Considers that failure to achieve required improvements needs to incur serious financial penalties.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR18	Asks who is paying for the cost of restoration, considers that mining companies should pay for this not taxpayers, but raises concerns that companies will look to minimise cost.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR39	Didn't select an option for the delivery of biodiversity net gain through restoration, as considers that the percentages provided are arbitrary and modest. Considers that an increase in biodiversity should not be used as justification for mineral extraction, and that consideration should be given to identifying key species that should form part of a restoration project. The end of restoration is more important than the uplift, so improvements need to take place during a phased extraction process not deferred until the end.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Some of the recovered sites could in addition to onsite biodiversity recovery post development could also be considered as future biodiversity offsetting sites. Alternatively, some sites could be used for tree planting or agricultural use.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR5	Supports a policy option which encourages higher rather than lower amounts of biodiversity net-gain as a minimum expectation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16	Application of biodiversity net-gain and use of the biodiversity net-gain metric specifically, for mineral extraction development may be problematic as the metric has not been designed for mineral extraction (but rather for development leaving a permanent built footprint and not having a history of delivering biodiversity gain, particularly housing). Mineral extraction occurs over a long time period and includes progressive working and restoration, which the metric does not adequately account for.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16	States that in the context of biodiversity net-gain, the approach should be to focus on outcomes and not overly on the net-gain process. Requiring more than the minimum 10% net gain (using the metric) would not be appropriate and could lead to unintended consequences such as 'gaming' the method to deliver easy-to-create habitats at the expense of larger and longer-term benefits already delivered through normal negotiation and agreement of restoration schemes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR20	Would like to know more about what a 10% or 20% net gain in biodiversity actually means in practice; and whether these figures are readily achievable	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR33	The policy approach needs to take into consideration the outcomes of the consultation on Biodiversity Net Gain Regulations and Implementation which closed on 5 April 2022. This consultation will shape the secondary legislation required to deliver the aims of the Environment Act. It is clear from this consultation that not every type planning application will be required to secure 10% net gain and these exemptions should be reflected in the policy. Initial trial of the biodiversity net-gain metric has highlighted the difficulty in applying it to minerals planning applications. Having been designed for residential development it cannot appropriately consider the effects of progressive restoration for instance. The unique situation surrounding mineral planning applications will need to be recognised by this policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR37	Reserve the right to comment in the future of the percentage of net biodiversity gain to be provided on a site. The percentage level is likely to be a reflection of other environmental and community benefits that are being provided e.g., climate change benefits/mitigation, the characteristics of the site and the time taken to restore the site and the long-term management requested.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Biodiversity net-gain should be maximised and should be required to be fully aligned to the Surrey Nature Recovery Strategy (which should be in place when the Minerals and Waste Local Plan is adopted).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR48	<p>Does not support any of the proposed options as currently formulated as the Surrey Nature Partnership recommends Surrey Local Planning Authorities adopt a minimum 20% net gain. Would be supportive of an approach that requires a minimum of 20% in biodiversity as the target for all planning applications, including for all site restoration and/or enhancement schemes. Given the scale of biodiversity loss in Surrey, the council is supportive of an ambitious approach to biodiversity net-gain. Therefore, the council supports the implementation of option 3 but note that the objective should be amended to ensure that “all other site restoration or enhancement schemes deliver at least 20% biodiversity net gain (on-site or through off-setting contributions as appropriate).” Additionally, it should be made clear within any detailed policy that biodiversity net-gain should be additional to any habitat creation required to mitigate or compensate for impacts of new development and should be delivered even if there are no losses through development. Biodiversity net-gain should not be applied to irreplaceable habitats and should be dealt with separately to any mitigation and/or compensation requirements for European sites.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR49	<p>Surrey is worse than the national average for biodiversity decline, but this is not identified as an issue. In light of this, Surrey Nature Partnership has called for 20% biodiversity net-gain to be adopted by all Local Planning Authorities in Surrey. This policy option should be further evaluated, for all development (not just quarry restoration). Also quarry restoration can be far in the future, so cannot solely be relied on for nearer term challenges.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR49	<p>States that option 1 fails to recognise that Surrey has suffered a biodiversity decline that is more pronounced and severe than England as a whole, and that as highlighted by Surrey Nature Partnership, 10% has lower likelihood of a achieving a meaningful net gain and in the context of greater historic biodiversity declines this is not appropriate. A higher level of uplift is necessary for restoration. Considers that option 2 is similarly inadequate as it proposes 10% net gain. Considers option 3 is the best available, but still inadequate in the context of Surrey. Regarding option 4 states that in line with Surrey Nature Partnership recommendation to Local Planning Authorities, there should be a 20% biodiversity net-gain for all development, including non-quarry schemes. Offering additional 10% on top of 20% i.e., 30% for quarries, does not address the key issues of habitat connectivity across Surrey. A small number of isolated sites, even if they are high quality has been demonstrated to be not enough to prevent the decline of biodiversity and associated ecological systems. Given that other Local Planning Authorities e.g., Guildford have concluded that 20% net gain does not put delivery of their plan, as a whole, at risk, the onus should be on the Local Planning Authority to prove why this approach would make development unviable, rather than vice versa.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR53	<p>Agrees that proposals for restoration will need to address biodiversity net gain, the viability of mineral site restoration through in-filling, climate change (target for the UK of net zero emissions by 2050) and the green and blue infrastructure network.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR53	Supports the statement that there is scope for minerals sites to be restored and enhanced for biodiversity benefits but does not agree that there is limited scope for this from a waste perspective (as stated in section 10). States it is important to ensure biodiversity net-gain is actively achieved for all waste management developments to enhance the environment within which the development is located. Waste management developments can have an immense impact on the environment and all opportunities to ensure they do not is necessary for the natural habitat and particularly communities which might be in close proximity to these developments. States support for the Restoration and Enhancement Position Statement document and considers this is a commitment to ensuring biodiversity net-gain targets are met.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 9 – Restoration ‘Use of Infilling’ Option One “Restoration to pre-extraction levels through infilling.”

Unique ID Reference	Summary of Issue	Response
CR6	There is no shortage of infill material only a lack of prioritisation by companies and other financial considerations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	This approach should be combined with a net biodiversity gain of 20%.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 10 – Restoration ‘Use of Infilling’ Option Two “Restoration to a lower level through partial infilling or no infilling.”

Unique ID Reference	Summary of Issue	Response
No representations received	No representation received	No representations received

Table 11 – Restoration ‘Use of Infilling’ Option Three “Site specific approach.”

Unique ID Reference	Summary of Issue	Response
WR6, WR24	Selected this option without justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers that the best environment should be created for an area rather than letting it flood, and that a balanced approach is needed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	There is no one-size-fits-all approach as every site is different. Considers that the impact of infill on the water table and flooding needs to be considered as a primary issue.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	This option guarantees that hazardous waste is not used for infill and that priority is given to guaranteeing watercourses and agricultural land will not be affected and that the highest level of restoration takes place.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR36	Timeframes for restoration and aftercare need to be set out at the planning stage.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR39 CR46	Considers that it is the most rational.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR43	Considers that the most appropriate and sustainable restoration of a minerals site needs to consider its specific characteristics and surroundings.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	Restoration should be specific to the site, its circumstances and setting.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that a policy framework could be developed to address potential issues relating to different scales of infilling and take account of how the land can be used for wildlife in the future and promote biodiversity whilst taking into consideration other constraints such as the risk of bird strikes on flightpaths resulting from new lakes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Considers that this option will allow the restoration approach to be tailored to each allocated site and surrounding context. Considers that this is the most sensible approach given the differing location and nature of each allocation. States that the supporting text for the relevant policy in the Local Plan could potentially set out further information on the different possible approaches and/or could be further explored through a Supplementary Planning Document post adoption.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59, WR33	Considers that each site has different settings and characteristics and should be restored in the most appropriate way for that individual site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR13, WR16	<p>Considers each site should be assessed on its own merits considering the local constraints and character, highway network, availability of materials for infilling at the time and in that location etc. The need for a site-specific approach is also demonstrated by the fact that large waterbodies are not necessarily desirable near airports due to the attraction of bird populations. However, there must be a balance between prolonging the infilling and the long-term management of the end site, this must be considered on a case-by-case basis.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR23	<p>Considers a site-specific approach would be most appropriate and allow the type of restoration and after-uses to be tailored to the location, characteristics, constraints and opportunities of the site and wider area. Inextricably linked to any planning permission to extract is the need to restore the land for ongoing, beneficial use. Where permission is already in place for infilling, or this would be the most appropriate means of restoration for a future site, would like to see sufficient policy support for appropriate facilities which will help to maximise the opportunity to attract and recover the right materials for the legitimate restoration of mineral sites, so that restoration can be delivered progressively, in a timely manner and to a high quality. It is imperative that materials are not diverted away from bona-fide mineral restorations into 'pseudo landfill / landraising schemes, which are not subject to the same restrictions as mineral sites.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR31	<p>This will ensure that the habitats created reflect the surrounding landscape.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR40	<p>The evidence appears to suggest that a one size fits all approach would not be suitable for infilling. Where the creation of waterbodies in decommissioned sites is not appropriate due to risk of bird strike, adequate mitigation should be ensured. The policy should also require consultation and negotiation with the relevant airport authorities in these circumstances.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR44	<p>This reflects the realities of individual site context and circumstances, as well as the issue of availability of inert fill material. Low(er)-level restoration options could include partial infilling combined with after -use for commercial or other development at least on part of a site, which if accommodated within a void would also mitigate visual impact. This could be achieved alongside delivery of other objectives and required biodiversity net gain. Reference in the question to each 'allocated' site appears to be restrictive and should be applied to any mineral extraction development coming forward.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR51	<p>States that the environmental impacts of using alternative means of infilling must be considered and clearly demonstrated before work is undertaken. Where possible, the most appropriate means of infilling must be sought, and this must also interact effectively with the final restoration scheme to ensure there are no conflicts which have longer term impacts to the local environment</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

<p>WR53</p>	<p>States sites and their sensitivities will vary and risks at sites can be mitigated in different ways, and that restoration aspects and consequent risks need to be considered at the earliest stages of each site development, as this can impact the future implementation. Phased development of mineral extraction operations is generally encouraged and should reduce competition for inert wastes and lead to faster restoration of sites thereby minimising ongoing pollution risks. Phased development will also allow for any updated projections of infilling and provide the option to amend overall filling plans accordingly, to reduce environmental impacts.</p> <p>Important to ensure that the infilling of mineral sites does not result in any barrier to groundwater flow. States that excavations associated with mineral workings can have a large and permanent impact on groundwater and surface water flows, as a result of the final site restoration and the replacement of permeable minerals with impermeable fill.</p> <p>The concentration of mineral workings within one area can increase the environmental impacts of sites. Large areas of infilled mineral sites can restrict groundwater flow which can lead to groundwater flooding on the up hydraulic gradient side of the infilled area and low flows on the down gradient side.</p> <p>The following aspects need to be considered in regard to infilling activities:</p> <ul style="list-style-type: none"> • Potential reduction of the area of aquifer available to convey groundwater flow due to infilling activities, resulting in; • the diversion of groundwater flow around areas of low permeability infill away from where it would naturally discharge such as local water courses, thus depleting flows for local water courses • lowering of groundwater levels on the down gradient side of the infilling, thus reducing water available to local abstractors or groundwater-dependent water features 	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
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Unique ID Reference	Summary of Issue	Response
	<ul style="list-style-type: none"> rising of groundwater levels on the up-gradient side of the infilling might cause permanent or seasonal flooding of the immediate area. <p>States that where sites are restored to open lakes, this can cause excess water to be lost via evaporation compared to restored areas of grass or crops, which can ultimately reduce groundwater base flow to river flows.</p>	

Table 12 – Restoration ‘Use of Infilling’ Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	There is a need to stick to timescales or cancel condition for infilling. Considers that this would make it more likely for waste contractors to do what is best for the site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Surrey County Council should take account of what local residents would like to happen with a site as well as doing a full Environmental Impact Assessment on any site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	States that much inert landfill is from the demolition of buildings, and that this material should be recycled and used in new construction, thus avoiding the need to extract gravel in the first place.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR39	There need to be key objectives and real parameters established in order to achieve better community outcomes than previous policy, as options are dependent on adequate resources.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR57	Considers that there needs to be clarity that the financial costs of mineral site restoration and future site management lies with the minerals operator, and, in the case of default, with the landowner.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR20	With reference to paragraph 11, we hear that suitable infill material and restoration soils are becoming less readily available. This situation may mean that worked out quarries become lakes. These could provide useful storage capacity for extra floodwater in the present era of climate change (paragraph 12). We note (paragraph 13) that access to green space is beneficial to human health and wellbeing. Here (paragraphs 15 – 17) we agree with the National Planning Policy Framework 2021 that worked land should be reclaimed at the earliest opportunity with high-quality restoration.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Comments that the shortfall in sufficient fill material is regrettable because although there are the short-term inconveniences of large numbers of Heavy Goods Vehicle movements, there is the advantage of putting the land to long term agricultural productive use. In places there is a danger of a surplus of new water bodies although we appreciate that there is often the added bonus of increased wildlife, particularly birds.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	<p>The approach should be strategic, as well as choosing between these three options and be different in different areas, with different concerns across Surrey. The cumulative impact of waste/minerals workings in an area must be considered, and how these fits with local spatial plans. For example: In Spelthorne many ex-mineral workings are not filled in, which increases water bodies. This may impact the number of sites that are given permission, and the rate of exploitation that is permitted, given the likely availability of material for subsequent infilling. However, the potential for lower-level sites as flood retention areas might also be considered. East of Redhill quarrying is operational in the Holmesdale Wetlands Biodiversity Opportunity Area. Whether or not restoration is complete/incomplete/used for wetland should be aligned to a wider spatial strategy, rather than be specific to sites. Therefore, none of the options is supported. A fourth option – to develop a spatial strategy that reflects the wider area where a quarry/mineral operation is proposed should be considered (i.e. option 4).</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 13 – Restoration ‘Site Restoration and Enhancement’ Option One “Retain the Surrey Minerals Plan approach to the form, content, and structure of the restoration policies for quarry sites.”

Unique ID Reference	Summary of Issue	Response
No representations received	No representations received	No representations received

Table 14 – Restoration ‘Site Restoration and Enhancement’ Option Two “Adopt a policy approach based on the type of land-use.”

Unique ID Reference	Summary of Issue	Response
CR43, WR44	Considers that quarry restoration differs significantly from restoration of development sites which have not been subject to quarrying operations, and that the restoration of quarry sites will need to consider landform and biodiversity value in parallel with other considerations, such as appropriate after-use and what value the quarry restoration can deliver in terms of inert waste recovery capacity.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	Considers that this would seem the most appropriate choice and not overly led by one issue.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Considers that this would allow a more tailored policy approach to the different types of development referred to and would allow consideration of a greater number of issues than option 3. Considers that it would also ensure that minerals development which does not involve quarrying would also be considered (which it would not be under option 1).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59, WR16, WR23	Considers different sites and development types have individual constraints, opportunities and settings.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	States that it is difficult to choose without more information but on balance selected option 2 as it appears to be more comprehensive and should include the biodiversity element of option 3.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR33	Considers this would provide a clear policy approach for all types of development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR48	This depends on the approach that the Minerals and Waste Local Plan takes with regard to the other policy areas in relation to biodiversity net-gain. The inclusion of a broad policy on biodiversity net-gain across all forms of development covered by the Minerals and Waste Local Plan would be useful, though this is likely to be covered in detail elsewhere.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 15 – Restoration ‘Site Restoration and Enhancement’ Option Three “Adopt a policy approach based on landform and biodiversity net gain.”

Unique ID Reference	Summary of Issue	Response
CR9	Considers that the more environmental gain the better.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	Considers that restoration needs to look at the widest possible picture to make sure it is a real net gain.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers it gives the most recognition for the need for restoration and compensating for environmental effects. Also comments that it would be the least harmful in the long-term, although it could have negative impacts on the local area in the short-term.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR36	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR39	Focusing on the end result ought to get a better long-term outcome, but there still need to be controls focusing on temporary infrastructure and associated issues. Considers that this needs to be added to option 3.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR46	Considers it would give the most biodiversity gain.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that it would provide for gains in biodiversity through a linked strategic approach to issues.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR53	Emphasises that any policy option supporting site restoration and enhancement in the Minerals and Waste Local Plan should ensure that there is no impact on water resources and should actively ensure biodiversity net-gain proposals are incorporated beyond compliance in most cases	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 16 – Restoration ‘Site Restoration and Enhancement’ Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	Did not select an option for site restoration and enhancement, as considers that there is no attempt to stop or penalise over filling or delays in completing the timescales given in the grant of planning, and that more account must be taken of planning policy. Considers that time is of the essence when it comes to restoration and there should be greater transparency in respect to vested interests.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR9	Full restoration of the land would be best.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Responsibility for the restoration and aftercare of mineral sites, including financial responsibility, lies with the minerals operator and, in the case of default, with the landowner.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Would like to see a combination of policy options 2 and 3 with a minimum of 20% net gain, and this should be across the total restoration project.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Suggest that a combination of options two and three would be the most appropriate. It is important that the policies address different types of land-use as these may have different restoration and enhancement requirements, but also considers that the landform to be achieved and biodiversity net gain are critical to restoration.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Land-use alongside biodiversity net gain should be considered. This should apply to all types of activity, including minerals developments that do not involve quarrying operations. Restoration and enhancement must consider site risks, such as the long-term risk of capped drilling wells risk of leakage to watercourses/underground hydrology. It must also address issues of contamination which may occur in oil and gas mineral extraction and other sites where leakage of pollutants may result in the long-term (e.g., where a landfill site sites at a higher level than watercourses (such as the Biffa landfill site East of Redhill) or in the case of a site with permeable material (e.g. many of Surrey's sand workings).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR49	Considers this should encompass other environmental and social objectives, beyond just biodiversity net-gain – should contribute to the vision of the plan as a whole i.e., restoration and enhancement policy should require proposal to contribute to climate change adaptation and mitigation, connected and (where appropriate) accessible green and blue infrastructure.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 17 – Climate Change Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR6	Considers that mineral extraction should not be used as an excuse for meeting carbon sequestering and capturing targets. Considers that mineral extraction and restoration to existing use and landform is the priority. Regarding other policy options, considers that capture of carbon dioxide and methane for energy generation is one possible option but not to the detriment of residents.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR33	Climate change policies should be set out at the national level and be implemented on a case-by-case basis. This is similar to the approach to biodiversity net gain which sets a specific target figure. It is difficult to support a prescriptive policy approach as each site has its own unique circumstances and minerals can only worked where they are found.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 18 – Climate Change Option Two “Broad environmental protection policy approach.”

Unique ID Reference	Summary of Issue	Response
CR18	Considers that options 3 and 4 go against climate change and the declaration by councils to aim to be zero net carbon. Considers allowing oil or gas extraction goes against reducing carbon footprint, and that carbon capture does not address the problem or help to reduce it. Also comments that all extraction of fossil fuels should stop in favour of investment in renewables, insulation of homes, investment in public transport etc.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.

Unique ID Reference	Summary of Issue	Response
CR59	Provides for a broad range of greenhouse gas emission strategies and mitigation opportunities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 19 – Climate Change Option Three “Climate Change mitigation policy approach.”

Unique ID Reference	Summary of Issue	Response
CR36	Selected this to ensure consistency across developments.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR46	Considers that it seems the most positive. Also comments that options 3 and 4 should be combined.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Notes that carbon capture is at very early stages of development and would expect protection of aquifers for water supply infrastructure as an imperative.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR16	<p>It would reflect the different issues and opportunities, and appropriate measures that may be taken, to consider greenhouse gas emissions from different types of development and operation. As the Sustainability Assessment Scoping Report identifies, the context should also be recognised as the greenhouse gas emissions generated from non-energy mineral extraction represent an extremely small proportion of total emissions from Surrey (and so even smaller nationally and globally) and an order of magnitude smaller than those generated by waste management. The measures that may be available and may be taken to further reduce emissions from non-energy mineral extraction and transport may be limited and depend upon the energy mix (for example the proportion of electricity provided through the National Grid generated by renewables) and availability and affordability of technology e.g. machinery and Heavy Goods Vehicles powered by alternative fuels. Restoration of mineral extraction sites also provides opportunities for carbon sequestration through habitat creation and management. Given these considerations, the policies should not seek to impose mandatory targets for reduction of greenhouse gas emissions on individual developments, but rather ensure that the issues have been considered and options identified and assessed to demonstrate whether reductions in emissions can be achieved.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR48	Supportive of an approach that delivers detailed policy guidance to address the impacts of minerals and waste management development on the causes of climate change and the steps that such developments can take to reduce or eliminate relevant emissions. Disagrees with option 1. Of the remaining available options, options 3 and 4 represent the more ambitious approaches. Considers that option 3 represents a deliverable, flexible, and concise approach to address the impacts of minerals and waste management development on the causes of climate change. Importantly, any detailed policy should include sufficient flexibility to remain relevant in the fast-changing technological landscape in relation to climate change mitigation. As such, policies that focus on outcomes rather than processes in this area may be more appropriate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 20 – Climate Change Option Four “Development-specific climate change policies approach.”

Unique ID Reference	Summary of Issue	Response
CR9	Importance of preserving the environment. Considers that the more you can reduce the carbon footprint the better.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	Importance of climate change, and highlights Surrey County Council’s declaration of a climate emergency. Highlights that concrete which much extracted mineral is used for is a major generator of carbon dioxide, and associated vehicle movements generate pollution. Considers that the Minerals and Waste Local Plan needs to aim for net zero as a minimum and ideally demonstrate it is positive for the climate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers it is the option that most addresses the climate emergency. Considers that the reference at paragraph 28 to making provision for the possibility of carbon capture and storage development should be taken out.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR43	Considers that action on climate change needs to be integrated into all planning policy and provide a clear but fair framework for development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	This option best reflects the diversity of issues arising from each type of development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	This option provides a fairly straight forward approach for mineral operators to follow, though greater clarity will be needed especially with regard to the proposed policy on carbon mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR6	Favours this option.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR13	Supports options 3 or 4. Option 4 may however, allow for a more flexible approach and clearer steer in relation to different types of development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers that a positive and pragmatic approach to addressing climate change should be taken. It should recognise opportunities (such as the ways in which restoration in particular can assist with e.g., flood attenuation and carbon sequestration etc.) but also where there may be limitations (e.g., insufficient space on site to accommodate renewable energy infrastructure). There should be an appropriate level of flexibility to enable proportionate, site-specific measures to be implemented, rather than any requirement to adhere to strict targets which may not be achievable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR40	Responding to the potential devastation caused as a result of climate change should underpin every aspect of policy, and it is therefore necessary to have a number of different development-specific policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	It would set clearer expectations for developers of specific types of minerals and waste development. Other options would rely on interpretation of National policy or broader policies which might result in developers not delivering sufficient climate change mitigation measures which are most relevant to the type of development proposed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	<p>Climate change policies must extend to cover the following three distinct climate aspects:</p> <ul style="list-style-type: none"> • Direct climate mitigation impacts: on-site and transport greenhouse gas (GHG) emissions. • Downstream/indirect climate mitigation impacts; impact of burning oil and gas that is extracted. • Climate Adaptation impacts. <p>All three should be calculated and considered for non-quarrying mineral applications (i.e., oil and gas).</p>	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	The downstream impact of other sites should be considered in terms of how the site generates a shift in behaviour, material and energy flows that aligns Surrey's economy to principles of both the circular economy and climate change. It is important that both are considered together. This approach is supported by the R (Finch) v Surrey County Council judgement by the Court of Appeal ruling, which stated that downstream impacts may be considered. It would be appropriate for Surrey to ensure that they are considered, which would align this Minerals and Waste Local Plan to Surrey's Climate Change Strategy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	A separate policy should be developed to consider the transport carbon impact of mineral/waste working. This should set out the transport distances for materials incoming and outgoing. For example, a planning proposal for the former Weylands site in Elmbridge would have served a market across the Southeast. The extent to which the site will support local/regional/national market (for waste management, waste disposal/land raising/ market for a mineral product and the associated transport distances should be considered at the planning stage and included as constraints in the site operation where planning permission is granted, including considerations for the carbon intensity of different forms of freight transport (diesel vehicle, electric vehicle, rail freight).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Finally, there should be a policy setting out the requirement and process to calculate and report overall direct and indirect carbon impacts, and this being linked to a five-year break clause on all planning permissions aligned to the UK carbon budgets. Local planning permissions should not be allowed to trump the way the UK is to plan and budget how we are to progress to zero carbon as a county.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.

Table 21 – Climate Change Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR39	Did not select an option as considers that none are good enough. Comments that although climate change is of the upmost importance, other issues such as noise, congestion and waste management are all important. Considers that climate change impacts need to consider externalities associated with facilities, and states that money might be better directed to encouraging reuse or less consumption. Considers that option 2 implies simply adding charging points to facilities, which is insufficient. Considers that option 4 could lead to hydrocarbon extraction being justified on the basis that it can provide for future carbon capture. Considers that policy in this crucial area needs more development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR57	Considers it may be necessary to consider the design of minerals and waste management waste plants etc. in regard to adaptation to changes in climate, including for those working on the site and wildlife, and in terms of making use of natural sunlight and ventilation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	States that options 3 or 4 would be the most appropriate, but that without having a detailed knowledge of the differences between the different types of minerals and waste developments in terms of whether they present different opportunities in their response to climate change, it is difficult to comment on whether a more tailored development specific approach is required (option 4) or whether one overarching climate change mitigation policy approach for all types of minerals and waste development would be sufficient (option 3). Considers that the types of issues raised by Surrey County Council in its policy options, including carbon capture and storage facilities, carbon sequestration and hydrogen production go beyond the existing policies in Runnymede's 2030 Local Plan.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16	States any climate change policies should seek to ensure that development is resilient to the effects of climate change and measures are incorporated to adapt to this, including through benefiting the wider area and objectives e.g., through providing water storage and flood mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Options 3 or 4 are preferred as they give greater emphasis to climate change. Suggests combining the two approaches to strengthen policies on climate change.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR37	The approach to climate change should reflect National policy and targets. This area of policy is likely to change over the period of the plan, any policy too detailed or specific may become outdated.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	<p>Option one is not supported as it has led to only limited climate impacts being considered in planning applications, and therefore also having only limited presence in monitoring/enforcement regimes. Option two is not supported as climate change impacts should be considered alongside not embedded in consideration of local (direct) environmental concerns. Developments should fully align to climate objectives and limit wider environmental impacts, not just one or a combination of both of these. Option three is not supported for two reasons. Firstly, planting of trees (sequestration) should not be used to offset carbon emissions of extraction as many other development sites will lose trees. Tree planting is supported but should not be a lever to enable further fossil fuel extraction (and therefore subsequent burning) but as ways to increase our resilience to climate change that is already happening. It is worth pointing out that unless a tree continues to maturity it will have no carbon benefit and will only have a net benefit many years into the future. This would require a replanted area to have strict controls to avoid subsequent loss of wooded area, and that you cannot offset carbon emissions with something that may happen 15 years later. How can such scheme be provided sufficient planning protection by Surrey County Council to ensure that restoration schemes are not trumped years later by a different borough/district council local development plan? Secondly, in no way should blue or grey hydrogen be supported. Surrey should focus on green hydrogen production and other ways to reduce energy demand and increase energy storage across the county.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR49	<p>Considers there should be fuller discussion in this policy area. The conclusions from this discussion should be set out in the 'Reasoned justification' text of the proposed policy/policies. In particular there should be reference made to:</p> <ul style="list-style-type: none"> • Surrey County Council's Climate Change Strategy. • The Appeal Court judgement involving Surrey County Council, noting that although the permission was not overturned, downstream greenhouse gas emissions are legally considered as indirect effects of extraction consents, they can be quantified and are allowed to be included in Environmental Impact Assessment (at the very least, this should be referred to in the policy context, rather than current approach which does not refer to downstream impacts and makes no reference to the essential need to drastically reduce both direct and indirect greenhouse gas emissions over the plan period). • The recent Government consultation on Designing a climate compatibility checkpoint for future oil and gas licensing in the UK Continental Shelf - not for onshore oil and gas but could this be relevant for Minerals and Waste Local Plan? And also see commentary from Climate Change Committee in response to: 'Climate Compatibility of New Oil and Gas Fields'. <p>Low-carbon hydrogen: need to define this and develop a position on other ('blue') hydrogen. Current policy suggestion seems to be suggesting that hydrogen from fossil fuels with carbon capture and storage would be an acceptable form of development in Surrey – considers there needs to be a discussion about this.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR49	Policy needs to refer to the downstream emissions (from consumption of fossil fuels) as indirect emissions associated with consenting extraction of oil and gas. States both direct emissions and indirect emissions must reduce over the plan period, in order to be aligned with Paris agreement and UK carbon budgets. Regarding option 4, states that surely Surrey would not be a suitable location for carbon capture and storage due to lack of suitable sites. Also considers there is a need to challenge basis of the assumption that blue hydrogen is sustainable. States that when Climate Change Committee mention carbon capture and storage and 'low-carbon hydrogen', they presumably mean that low-carbon hydrogen is produced from renewable energy sources only and separately, carbon capture and storage is for capturing emissions from the downstream consumption of fossil fuels in residual hard to decarbonise areas. Does not consider the Climate Change Committee envisages that 'low-carbon hydrogen' is achieved by hydrogen production from fossil fuels with carbon capture and storage; this would not be efficient.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR53	Supports options 3 and 4. States it is not clear that adaptation to the impacts of a changing climate in regard to flood risk management has been considered. As highlighted in the Circular Economy and Climate Change Position statements, this connection should be acknowledged with commitments to identify innovative measures from minerals and waste developments to address these.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 22 – Air Quality Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR50	Considers that overly specific policy is likely to become out of date quickly, as air quality is an area of concern for all. Considers it would be best to keep policy simple and refer to current national standards. States that as air quality is managed by district and borough councils they will need to be involved.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR58	Considers that Policy EE2 of the adopted Runnymede 2030 Local Plan provides sufficient policy guidance on air quality matters.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59	This option maintains the most appropriate opportunity for management and mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16	It would maintain the current approach which requires dust and fumes to be considered when determining applications for minerals development and enables a pragmatic approach to be taken to addressing impacts, management and mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR37	Selected this to follow National policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 23 – Air Quality Option Two “Broad environmental protection policy approach.”

Unique ID Reference	Summary of Issue	Response
WR12	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers this takes a pragmatic approach and would avoid policy repetition. Considers the policy should be positively worded to support development where it is demonstrated that potential dust and air quality related impacts can be avoided or mitigated to acceptable levels/thresholds.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR33	A broad protection policy would be sufficient in this instance to ensure that unacceptable significant effects are approved in planning applications for mineral and waste development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 24 – Air Quality Option Three “Single air quality mitigation policy approach.”

Unique ID Reference	Summary of Issue	Response
CR36	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that it is the most comprehensible. Comments that it is important that the highest standards are applied.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR46	Do not see why the air quality requirements should change according to the type of development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR8	Preferred option would be option 3 although with sufficient consideration, this could also be included as part of a broader environmental protection policy i.e., option 2.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR48	This represents the appropriate level guidance, which is deliverable, flexible, and concise, to address the impacts of minerals and waste management development on air quality. Potential air quality impacts from development represents a technical and variegated area, which would benefit from detailed guidance in an holistic air quality mitigation policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 25 – Air Quality Option Four “Development-specific air quality policies approach.”

Unique ID Reference	Summary of Issue	Response
WR6 WR13 WR40	Selected with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR6	Considers that it should give greater control over sites.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	A balanced approach is needed. Considers that everyone should have access to good quality air.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	Considers that air pollution can have a significant impact on health. Considers that mineral extraction should not be located within 1000 metres of residential properties and schools, and waste management should not be close to where people live or work.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
CR18	Gives the most environmental protection.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR39	Considers that the requirements vary between types of facility. Considers that targeted policies should be more considered and stringent than a single policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR57	<p>Considers that the location of sites and Air Quality Management Areas, and also other sensitive uses, and air quality should be a major consideration in the development of sites for minerals and waste uses. Considers that an additional area for consideration is the cumulative impacts where for example there could be a combination of minerals and waste management facilities on the same or adjoining sites, but that ultimately the policy should cover key considerations and remain focused for use by developers.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR24	<p>Considers it is more comprehensive. A main concern has been the lack of adequate monitoring of air quality and leaving it to the generators to monitor because of insufficient resources. Distances from residential properties should be a major consideration.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR46	<p>It would set clearer expectations for developers of specific types of minerals and waste development. Other options would rely on interpretation of National policy or other broader policies which might result in developers not delivering sufficient and relevant air quality mitigation measures.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR51	<p>States the entirety of Spelthorne is an Air Quality Management Area and is impacted substantially by vehicles movements and emissions. Access to many waste and minerals sites requires travelling through residential areas and using local roads. There are many impacts of this both in terms of congestion and emissions and issues. Would welcome a specific policy to deal with these impacts and reducing these where possible. Highlights emissions from associated vehicles and also cumulative impacts such as Stanwell Moor where emissions from these vehicles add to those generated by M25 and by Heathrow Airport. Consideration should be given to encouraging site operators to electrify their vehicles to reduce these impacts. Would be supportive of a policy approach which seeks to achieve this.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR53	States that any selected option for the Minerals and Waste Local Plan must include opportunities for improving air quality as well as prevent deterioration. States it is important to understand that there will usually be other/non-planning regulatory requirements which regulate air quality impacts for minerals and waste proposals, and both need to be fully satisfied to deem a proposal acceptable in any given location.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 26 – Air Quality Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	Account must be taken of surrounding residents and habitats as a whole not just site-specific issues without a proper baseline.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Consideration should be made to the sensitivity of different air quality receptors and needs to take into consideration existing background levels of air pollution.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR8	Minerals and waste management development could have considerable bearing on local air quality in Surrey. A reliance on national air quality limit values and objectives would fail to consider the very low-level background air pollution in more rural parts of the county, such as in Waverley. A proposed minerals or waste operation could contribute significantly to nitrogen oxide or particulate matter emissions whilst remaining below the national annual or hourly objective levels.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Option three or four is preferred. Development of minerals or quarry operations should have more stringent air quality controls where existing air pollution is significant – such as where transport is on routes already with significant nitrogen oxide and/or particulate pollution or where proposed developments sit, or impact on traffic movements within an Air Quality Management Area.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR48	The implementation of options 1 and 2 would appear to provide insufficient guidance on this technical area. Given the variegated context that the different types of development face in relation to potential air quality impacts, policies that focus on outcomes rather than processes in this area may be more appropriate. Therefore, option 4 would appear to be less deliverable and an inefficient way to present the requirements concerning potential air quality impacts.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 27 – Water Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR59	This maintains the most appropriate opportunity for management and mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16, WR33	This provides for a pragmatic and proportionate approach to be taken in addressing impacts, management and mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers this takes a pragmatic approach and will avoid policy repetition. The policy should be positively worded to support development where it is demonstrated that potential hydrological, hydrogeological and flood risk impacts can be avoided or mitigated to acceptable levels/thresholds.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 28 – Water Option Two “Single water environment protection policy approach.”

Unique ID Reference	Summary of Issue	Response
CR36, WR12	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR46	States that they do not see the need for separate policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	Considers that there are water quality, protection and flood issues and a variety of development types to consider with unique potential impacts. Considers that options 1 and 3 don't seem to reflect these and a single simple policy may be the most appropriate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 29 – Water Option Three “Separate water quality and resources policy and flood risk management policy approach.”

Unique ID Reference	Summary of Issue	Response
CR6	Considers it gives better control at site level.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers building on floodplains needs to stop. Also considers that rivers should be dredged to improve water flow.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.

Unique ID Reference	Summary of Issue	Response
CR23	Considers that every site is different and needs to be assessed as such to ensure water quality and flood risk are not compromised by development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that it is more focused and breaks down the issues, as considers water quality and flood risk are two different issues therefore should have different policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR39	Water pollution and impact on water flows are completely different. Considers that separation should allow more considered and stringent regulation. Highlights that rainfall attenuation is an important function that is not properly costed. States that although the risk of pollution from fracking is small the potential damage would be high so a prudent, precautionary approach should apply given ample resources exist elsewhere in the world.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR43 WR6	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR44	Considers that protecting water quality and mitigating flood risk may be interrelated but may require different mechanisms.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that it could provide clarity to the different operators, though consideration should be made as to how this would work in real life and how far operators would be expected to go in their evidence.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR24	Considers it is the most comprehensive. With more storms and increasing flood risk as a result of global warming, it's important that no development increases the risk of flooding, and if possible, achieves a net reduction.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Water quality and resources and flood risk management are two separate issues, it would be more appropriate to have separate policies covering them. Also, welcomes reference to natural flood management as a preferred approach, as this would both have a positive impact on protecting communities while respecting the environment, but would also minimise the need for local mineral extraction of resources for concrete production.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	It would set clearer expectations for developers of specific types of minerals and waste development. Other options would rely on interpretation of National policy or other broader policies which might result in developers not delivering sufficient and appropriate water quality and flood risk mitigation measures.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR51	Considers these should be treated as separate issues. States that consideration must be given to protecting water quality specifically when working reservoirs and land close by given the potential impacts of this on groundwater and potential contamination.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 30 – Water Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	Regarding other policy approaches that should be considered, states that these should always be considered with the surrounding use and planning policies of Local Planning Authorities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR18	Paragraph 43 of the consultation document should be taken out, as considers that development is never necessary.	Not a material planning consideration for the purposes of plan-making, or conflicts with one or more provisions of the National Planning Policy Framework 2021 and/or the National Planning Policy for Waste 2014, or otherwise falls outwith the statutory powers of the Minerals and Waste Planning Authority.
WR12	As there are cumulative impacts causing flooding and water, it seems unreasonable to set up a potential conflict with other water and flooding mitigations and regulations. However, the opportunity should be used to review the cumulative effect of commercial and minerals and waste development on aquifers, water and flooding and align policy to recognise the need to manage it.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Regarding other policy approaches that should be considered with reference to water, take into account the opportunity for collection and drainage, and the provision of additional leisure facilities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR37	Support a policy approach to water and restoration which considers the benefits of flood water storage or management as part of the public benefit/climate change mitigation strategy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR47	Water quality/protection should consider the hydrology of the area where the development is concerned. For example, is the development located in an area where groundwater sits within an aquifer that is accessed for drinking water and is there risk/potential of surface water from the development area running off into rivers or streams. The flood risk option must consider the worst circumstances including uplift for the climate impacts on both the likelihood and intensity of flood events.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR48	<p>Prefers either option 2 or option 3 as these would each represent an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the impacts of minerals and waste management development on water quality, water resources, and flood risk management. Potential impacts on water quality and water resources from development represents a technical and variegated area, which would benefit from detailed guidance in a holistic water quality and water resources mitigation and management policy. Consideration of Flood Risk Management may benefit from discussion in a holistic single policy, as the policy requirements and discussion are likely to relate or overlap somewhat. However, consideration should be given to setting out requirements relating to flood risk management in a distinct policy should the topic area warrant particular attention in the drafting of the policy. Given the variegated context that the different types of development face in relation to potential water quality, water resource, and flood risk management impacts, policies that focus on outcomes rather than processes in this area may be more appropriate. States they would defer to the advice of the Environment Agency in this regard where appropriate.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR49	<p>This doesn't give options which reflect different levels of ambition against this objective – just how many policy statements.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

<p>WR53</p>	<p>At point 39 of the document, further emphasis should be made in terms of how mineral and waste developments can impact on the quantity and quality of water resources. Also states [at point 41] that it is important to refer to Water Framework Directive targets. States groundwater bodies also each have a quantitative status classification which should also be considered in any proposal. States Surrey is underlain by 17 groundwater bodies that fall within the area covered by the Thames River Basin Management Plan. Of the groundwater bodies within Surrey, 12 exhibited 'poor' overall status in 2019 and 5 exhibited 'good' overall status. Groundwater bodies can be polluted by point sources, such as leachate from landfill sites or effluent from industrial sites, and from diffuse sources such as runoff from agricultural land or roads.</p> <p>States that the following points also need to be considered within the text justification which can also be transferred into the water policy justification section of the Minerals and Waste Local Plan:</p> <ul style="list-style-type: none"> • the cumulative environmental impacts in the context of existing mineral extraction sites. • the site's wider hydrogeological context is very critical to consider because some areas can form important areas of water recharge to distal aquifers (for example the site area could be linked to distal confined aquifers). Affected aquifers might be further away than 1 km if they are connected at depth. • plans need to also consider the loss of groundwater storage capacity in the site area and the wider area due to the permanent loss of the permeable mineral material that has been excavated. • there will usually be other/non-planning regulatory systems (such as abstraction licence etc.) which regulate the impacts on water quality and quantity from minerals and waste proposals and both need to be fully satisfied to deem a proposal acceptable in any given location. • potential climate change impacts to water quantity/quality should also be considered at the earliest stages of planning. For example, potential 	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
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Unique ID Reference	Summary of Issue	Response
	<p>increase in evaporative losses from the creation of lakes, reduces the water budget that otherwise would be stored in the aquifer.</p> <p>Advises that the Environment Agency’s approach to groundwater protection, February 2018 Version 1.2 should be considered within the text justification which can also be transferred into the water policy justification section of the Minerals and Waste Local Plan. As well as Position Statement N7 - Hydrogeological risk assessment], Position Statement N8 - Physical disturbance of aquifers in Source Protect Zone 1 and Position Statement N11 - Protection of resources and the environment from changes to aquifer conditions.</p>	

Table 31 – Land and Soils Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR50, CR57, CR59	Considers that the existing approach follows good practice and works and is in line with National policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16, WR33	Provides for a pragmatic and proportionate approach to be taken in addressing impacts, management, and mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Takes a pragmatic approach and would avoid policy repetition. The policy should be positively worded and support development where it is demonstrated that potential impacts on land and soils resources can be avoided or mitigated to acceptable levels.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 32 – Land and Soils Option Two “Single land and soils protection policy approach.”

Unique ID Reference	Summary of Issue	Response
CR36	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	There should be clauses specific for local land use/mineral availability/waste demand.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR48	Considers this represents an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the impacts of minerals and waste management development on land and soil resources, including risks of contamination and instability. States they would defer to the advice of the Environment Agency in this regard where appropriate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 33 – Land and Soils Option Three “Development-specific land and soil protection policies approach.”

Unique ID Reference	Summary of Issue	Response
CR6	Considers that it would give better site control.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers that if sites are filled correctly, they could be used for small housing developments. Also comments that soil should be replaced with the same type and not imported material.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR23, CR18, CR43, CR39, CR46, WR24	Requirements are likely to vary between sites.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	It separates minerals and waste into separate issues.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Considers this is likely to lead to the best development management outcomes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	It would set clearer expectations for developers of specific types of minerals and waste development, and not rely on interpretation of national policy or other broader policies which might result in developers not delivering sufficient appropriate land and soil protection measures.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR51	States that soil contamination is a particular concern, especially regarding minerals development to ensure that land won soils are deposited suitably after extraction and that, if they are to be re-used for infilling, those suitable procedures are followed to limit cross-contamination. Also states that consideration must be given to infilling of sites and how soil testing may be undertaken to ensure that soils are not contaminated if these are to be used.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR53	Option 2 or 3 would be suitable to give more defined protection policies. However, option 3 gives scope for potential different focuses for each of the two policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 34 – Land and Soils Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	Local authority planning policies must be considered as the framework for any conditions and policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that valuable agricultural land should not be taken away, as food production is a higher priority particularly post Brexit.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Support either options 2 or 3 depending on whether Surrey County Council thinks a single policy would be effective or whether multiple policies would be required to cover the nuances between different types of minerals and waste.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Regarding other policy, consistency of approach seems important, but so does a strong degree of localisation of policy due to the differing minerals bases in the county and urban/rural communities for waste management. Any single policy would need to permit local exceptions and differences. The policy would need to standardise the approach and principles for local decisions and allow flexibility to local conditions.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR47	<p>These should be linked to the emerging Surrey spatial planning strategy. This is expected to lead to more proactive and consistent planning approach for renewable energy generation potential across Surrey as well as tree planting, flood risk/watershed management and agricultural/forestry policies. The linkage between the way renewable energy generation capacity will be planned positively across Surrey and overall strategic spatial planning is considered across Surrey with the way the Minerals and Waste Local Plan governs minerals and planning applications in particular is not understood. These policies should be set out and applied consistently to all forms of development, not just minerals and waste applications, across Surrey – as well as taking on specific aspects highlighted in borough and district local development frameworks. Once this overall strategic approach and policies are developed then this could be referenced by the Minerals and Waste Local Plan with specific policies and details added as appropriate.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR49	<p>Options 1,2 and 3 are not meaningfully different and are just focused on how many policies there should be. Options should describe the different levels of ambition which are possible, with respect to how development can be required to safeguard land for other purposes.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR49	<p>Why is restoration policy separate from the nature policy, given that restoration policy seems so focused on nature / biodiversity net gain? Is this due to different timescales? Considers that the policy context text fails to recognise the level of biodiversity decline nationally and that Surrey has experienced biodiversity decline at a rate even higher than the National average. States that connectivity is key to restoration of ecological networks. Site allocation must take account of both existing designated sites and should also include support for site design to support strategic opportunities for habitat connection– in line with emerging Local Nature Recovery Strategy. Also, extent of sites subject to 20% BNG should be as wide as possible, not just focused on a small number of sites such as restored quarries. The plan should set a high standard for biodiversity net-gain across all sites, with recourse to off-site solutions (if necessary) to achieve this. Only requiring mandatory 10% biodiversity net-gain reduces contribution of minerals and waste developments to nature recovery. In light of Surrey Nature Partnership’s evidence-based recommendation for 20% biodiversity net-gain, the onus should not be on plan promoter (Policy team) to prove 20% biodiversity net-gain is unviable, rather on requiring more evidence to support this approach. Surrey County Council is due to be responsible authority for Local Nature Recovery Strategy and is key member of Surrey Nature Partnership. If not adopting Surrey Nature Partnership recommendation for planning policy, when policy review opportunity arises, should clearly justify why.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 35 – Nature Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
No representations received	No representations received	No representations received

Table 36 – Nature Option Two “Single nature and biodiversity policy approach.”

Unique ID Reference	Summary of Issue	Response
CR36	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	This option appears to provide the most detailed and linked analysis of many specifics and localities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR33	Considers a single policy approach would help to ensure the policy is clear and avoid unnecessary duplication in accordance with the National Planning Policy Framework 2021. This policy should be reflective of paragraph 176 of the National Planning Policy Framework 2021 but acknowledge that minerals can only be worked where they are found.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 37 – Nature Option Three “Separate nature protection and biodiversity net gain policies approach.”

Unique ID Reference	Summary of Issue	Response
CR23	Considers that each proposed development needs to demonstrate it will meet the improvements it proposes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR43	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR44	Considers that the protection of the natural environment is complex relying on different acts and guidance. States that the Environment Act and associated regulations and guidance will add to the complexity and the plan policies will need to reflect this to ensure protection of all features important for nature conservation. Considers that policies in district and borough local plans do not take account of the large extent of mineral or the length of time they may be worked.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	Considers that there are differing issues to consider that need to be reflected, the protection of habitats and species, and biodiversity net-gain. Considers these require separation in policy terms.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Considers that nature protection and biodiversity net-gain are separate issues and therefore it would be more appropriate to have separate policies covering them. It is crucial that the approach here takes full account of the Environment Act and places a Nature Recovery Strategy at the heart of the approach.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59	Considers that minerals developments present unique opportunities for biodiversity net-gain.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16	Separate policies for protection of designated sites and protected species, enhancement of ecological networks, and biodiversity gain would be appropriate, given that implementation of the 'mitigation hierarchy' is a separate requirement to enhancement of ecological networks, and biodiversity net-gain. The policies should recognise the key role that mineral extraction and restoration can play in delivering enhancement of biodiversity, including in due course in areas identified for enhancement in the Local Nature Recovery Strategy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR23	<p>Considers this takes a pragmatic approach and would avoid policy repetition. The National Planning Policy Framework 2021 requires sites of biodiversity value to be protected and enhanced “in a manner commensurate with their statutory status or identified quality in the development plan” (para 174 (a)) as distinct from “minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological network” (para 174 (d)).</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR46	<p>It would set clearer expectations for developers of specific types of minerals and waste development, and not rely on interpretation of national policy or other broader policies which might result in developers not delivering sufficient appropriate nature protection or biodiversity net-gain measures.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR48	<p>Considers it represents the appropriate level of guidance, which would be deliverable, flexible, and concise, to address the potential impacts of minerals and waste management development on both protected habitats and species, and the delivery of biodiversity net-gain. Biodiversity net-gain management and the protection and enhancement of protected habitats and species are sufficiently detailed topic areas to warrant guidance to be provided in two distinct policies. Given the detailed policies that many district or borough local development plans have set out, any policy taken forward should take account of the ambition and intent of these policies to ensure that the requirements are consistently ambitious across the county. In the research and development of this policy, consideration should be given to the extent of coverage across the county of adopted local development plans that include policies on biodiversity net-gain. If it is determined that there is sufficient coverage amongst the district and borough’s adopted local development plans, option 4 may be considered appropriate. Any conclusions made in this assessment should be set out in the discussion accompanying this proposed policy in the next iteration of the Minerals and Waste Local Plan.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 38 – Nature Option Four “Single strategic nature protection policy approach.”

Unique ID Reference	Summary of Issue	Response
CR6	Considers it a better all-round policy strategy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers that better green space leads to better wildlife.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that local knowledge is needed on such decisions, and that this option takes into consideration the wider picture outside the county. Expresses concern about minerals and waste development impacting on nature, and questions why, if minerals development can ‘provide unique opportunities for geological or palaeontological study’, this cannot be done without development taking place?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 39 – Nature Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR44	Considers that a policy that application sites that demonstrate restoration which provides linkages to green infrastructure and achieves targets in Biodiversity Opportunity Areas and in the Local Nature Recovery Strategy would be encouraged.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Support either option 2 or 3. Considers option 4 would not appear to be appropriate given that Surrey County Council is considering using policy to secure higher levels of biodiversity net-gains on restored minerals site than local policies. Considers option 1 may not be appropriate as the Surrey Minerals Plan contains no reference to achieving biodiversity net gain given the age of the document.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR57	Considers that options 3 or 4 would both provide a more up to date context than relying on option 1.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR53	Advises that any policy option should robustly aim to meet biodiversity net-gain targets considering the nature of minerals and waste developments and their impacts on the environment.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 40 – Landscape and townscape Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR43	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	Considers that the protection of the landscape and townscape raise differing issues, and the present policy best reflects this.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 41 – Landscape and townscape Option Two “Single landscape and townscape policy approach.”

Unique ID Reference	Summary of Issue	Response
CR23	Considers that local people affected by proposals need a greater say in what is happening in their area.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR36	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Most appropriate as it appears likely to contain an extra layer of detail beyond existing local plan policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59	Minerals should be treated separately as they can only be developed where they occur and are appropriate development within the Green Belt.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	It appears to provide the most detailed and linked analysis of many specifics and localities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16, WR44	A specific policy is required to reflect the exceptional circumstances in which major development within protected landscapes may be acceptable and permitted, with the policy making it clear that minerals can only be worked where they occur and are essential for the economy, that extraction is a temporary activity, and restoration can enhance the landscape as well as delivering other ecosystem services and benefits.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers a separate criteria-based policy is needed setting out the exceptional circumstances under which major development proposals in protected landscapes would be permitted. A broad environmental policy could cover the need to address landscape impacts more generally.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR33	States that a single policy approach would help to ensure the policy is clear and avoid unnecessary duplication in accordance with the National Planning Policy Framework 2021. This policy should be reflective of paragraph 176 of the National Planning Policy Framework 2021 but acknowledge that minerals can only be worked where they are found.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	It would set clearer expectations for developers of specific types of minerals and waste development, and not rely on interpretation of National policy or other broader policies which might result in developers not delivering sufficient appropriate landscape or townscape protection.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 42 – Landscape and townscape Option Three “Single strategic landscape and townscape policy approach.”

Unique ID Reference	Summary of Issue	Response
CR6, CR18	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers that unused sites in towns should be built on rather than the Green Belt. Also comments that removal of the Green Belt will lead to Surrey becoming part of London.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that it gives local councils more control over what happens in their areas	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	States that this option is broadly supported provided that all boroughs and districts have adequate landscape and townscape policies in place. States that if not, option 2 would be supported.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR6	Finds it difficult to choose between options 2 and 3 but favour the “local” development plan reference in the latter.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Each of the districts and boroughs have different landscapes and townscapes and already have detailed policies in place and therefore it would be better to rely on these than have a generic approach in the Minerals and Waste Local Plan.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR48	Considers that this represents an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the potential impacts of minerals and waste management development on both landscape and townscape, given the likelihood that Surrey’s borough and district councils will benefit from adopted detailed policy guidance.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 43 – Landscape and townscape Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR18	Considers that local people may not want minerals development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR39	The strategic vision should impose demanding minimum environmental requirements, but local councils should be able to impose higher requirements.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR39	Considers that relying on local plans produced by lower-tier authorities risks a patchwork approach. Considers that Surrey County Council should set a high minimum that local areas might exceed by having higher restrictions. This is therefore a combination of options 2 and 3.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR37	Policy should reflect National policy on these matters. Minerals working can be considered in these areas if exceptional circumstances are demonstrated and public benefits are delivered	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR54	Notes that the effect of mineral extraction and waste management on protected designated landscapes is acknowledged and that the National Planning Policy Framework 2021 emphasises that any major developments should only be permitted in exceptional circumstances. Suggests that the Minerals and Waste Local Plan should contain policies containing more proactive protection for such landscapes and emphasise that any conditions attached to works in these landscapes will be rigorously enforced.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 44 – Heritage Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR6, CR43	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 45 – Heritage Option Two “Single historic environment policy approach.”

Unique ID Reference	Summary of Issue	Response
CR12	Considers that it is preferable for heritage to be dealt with in dedicated policies, rather than threaded into other policies (option 1). Option 3 seems unnecessary to have separate policies as they will be largely the same. Option 4 exposes non-designated heritage assets to potential uncertainty if the terms of the various local plans change. Also, some district policy differs from one another and where mineral sites cross district borders this may lead to ambiguity of approach.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that it would probably be the most straight forward to implement and could cover harm to the setting of heritage artefacts, vibration and noise, dust, and post use management.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59	Considers this is the most appropriate policy for minerals sites.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16	It would provide for a single policy that includes up-to-date requirements on assessment of potential effects, harm, and how this may be mitigated.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers a single positively worded policy could provide the necessary guidance relating to minerals and waste development, without the need to delve into other parts of the development plan. As required by the National Planning Policy Framework 2021, the policy should require “detail proportionate to the assets’ importance and no more than is sufficient to understand the potential impacts of the proposal on their significance.”	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR33	States a single policy approach would help to ensure the policy is clear and avoid unnecessary duplication in accordance with the National Planning Policy Framework 2021.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 46 – Heritage Option Three “Separate policies approach.”

Unique ID Reference	Summary of Issue	Response
CR23, WR12	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Considers this is likely to lead to the best development management outcomes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	It would set clearer expectations for developers of specific types of minerals and waste development, and not rely on interpretation of National policy or other broader policies which might result in developers not delivering sufficient appropriate historic environment protection measures	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR48	Considers this represents an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the potential impacts of minerals and waste management development on heritage, given the likeliness that Surrey’s borough and district councils will benefit from adopted detailed policy guidance.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 47 – Heritage Option Four “Single strategic heritage policy approach.”

Unique ID Reference	Summary of Issue	Response
CR9	Considers that without historic sites you cannot teach history. Also comments that the old should be repaired rather than building new.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18, CR36	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	This option would appear suitable, and that Runnymede Borough Council has a suite of up-to-date heritage policies (EE3 to EE8), therefore is considered unlikely that extra detail would be required specifically related to minerals and waste development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 48 – Heritage Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR12	Remember to include views and vistas as heritage assets, both in assessing sites, and in restoration projects.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR39	Did not select an option as the implications are not clear between options 2, 3 and 4. Considers that leaving details to local councils has some merit but the county should impose high minimum as a principal for all sites not just nationally important ones. Considers that it is not currently possible to choose between these options due to insufficient detail of the implications.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR12	Planning in a condensed environment where there is much competition, needs to package heritage assets on a local case by case basis and mitigate, allow, or protect within strong local parameters. This would allow more detailed policies; we believe there should be contextualised thinking on the two issues.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 49 – Movement and access Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR23, CR36, CR46	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Comments that either option 1 or 3 are considered appropriate, as both would appear to provide the most comprehensive policy response in terms of setting policy for alternatives to road-based transport for both minerals and waste development. States that option 2 would not appear to cover the alternative of water borne transport.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	Support a similar approach to that adopted at Policy 15 of the Surrey Waste Local Plan, as there are no known changes in circumstance that would warrant a departure from that approach. Considers that there should be (1) a spatial strategy which affords priority to sites that can be served by sustainable modes of transport; and (2) a transport and access policy that specifically encourages where it is practicable and economically viable to do so, for the proposed development to make use of rail or water for the transportation of materials to and from the site, in preference to road movements.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR46	Selected this option because it makes specific reference to “the impacts of waste management development on transport networks and requiring that alternatives to road-based transport be considered”. It is felt that specific consideration of the impact of waste management development might get lost within the other two policy options, as these considerations will be combined with mineral development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 50 – Movement and access Option Two “Two policy approach.”

Unique ID Reference	Summary of Issue	Response
CR50	Considers that this best reflects the separate issues of transport and safeguarding.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59	Considers this provides the most appropriate policy for the movement of aggregates and waste.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16, WR18	This appears to be the most appropriate approach, covering impact on transport networks and separately safeguarding rail depots and encouraging rail.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers this would allow for the consolidation of the established policy approach, whilst maintaining the objectives to address transport-related impacts and to promote and safeguard alternative modes of transport to the car, where this is practicable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR33	States a two-policy approach would help to ensure the policies are clear and avoid unnecessary duplication in accordance with the National Planning Policy Framework 2021.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR51	Selected this option to ensure that vehicle movements are controlled as best as possible to ensure that impacts are minimised and to safeguard the local population. Would encourage the use of rail as an alternative to using road-based transportation. States that previous comments on air quality are also relevant and ensuring that existing restrictions are not removed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 51 – Movement and access Option Three “Three policy approach.”

Unique ID Reference	Summary of Issue	Response
CR6, CR43, WR6, WR12	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR9	Considers that more use should be made of rivers and rail to reduce road traffic.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that it gives the most thought to problems regarding Heavy Goods Vehicles. Comments that this option might mean that rivers are managed and looked after but could also create pollution so this would need to be managed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR57	Considers that separation of policies would provide clarity and reflect individual development types impacts.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Particularly support the policy focussing on encouraging the use of rail for the transport of waste as this will reduce impacts on the road network and vehicle emissions. However, it is recognised that the use of rail may not be feasible throughout the whole of the county and therefore the development of well-located sustainable transport corridors should be specifically included.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR48	Considers this represents the most deliverable and efficient approach to address the impacts of minerals and waste management development on the transport network. Given the variegated context that the different types of development face in relation to potential impacts on the transport network, policies that focus on outcomes rather than processes in this area may be more appropriate. In drafting the detailed policies, Surrey County Council should consider the benefits of including requirements that alternatives to road-based transportation are demonstrably explored before any decision is made to rely on road-based transportation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 52 – Movement and access Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR39	Did not select an option, but comments that safeguarding aggregate depots may be inappropriate if they are in the wrong location, and that promoting a new depot in a better location might be appropriate. Disagrees with suggesting alternatives to road transport but considers that there may need to be limits on vehicle movements or contributions required for improved highways. Highlights that access by the public to recycling facilities also generates significant traffic. Comments that river and wharves could be important if more use was made of canals.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Finds that a transport policy that is all encompassing for impact on roads, conditions of roads, journeys, emissions, community is important, but this does not negate the need for transport to be considered under each of the other policy areas where the context is not broad but specific to the issues. A broad policy may not catch nuances for specific circumstances	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Regarding other policy approaches that should be considered with reference to movement and access, reduction of the movement of materials is a priority. Future of transport, electrification, use of flight as an alternative to some current transport mechanisms (drones), specific highly maintained Heavy Goods Vehicles routes to manage traffic safety and road condition issues.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR11	Consideration should be given to water and rail transport over road travel if feasible for environmental and transport reasons, this is typically reserved for bulk movements over medium to long distances at present. However, opportunities should be considered to exploit these if feasible.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR18	As Surrey restricts the volume of construction materials extracted from the county, it will become more reliant on aggregates imported into the county. Therefore, maintaining and safeguarding a sustainable alternative to delivering aggregates over long distances by road is imperative.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR21	<p>Does not have a particular comment to make on the options themselves other than to reiterate that there must be policy safeguarding for rail aggregates depot. This must include consultation areas which are not referenced under any option. It is however noted that consultation areas are dealt with at Chapter 10: 'Safeguarding'.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR47	<p>The current policy approach for transport focuses on the degree to which transport is a constraint to development but does little if anything to plan for more sustainable transport options for the impacts of minerals and waste sites. This should be strengthened in four areas:</p> <ul style="list-style-type: none"> • Climate impacts (greenhouse gas emissions of the transport itself); • Road safety impacts (noting the particular danger that Heavy Goods Vehicles pose to pedestrians and cyclists); • Air pollution impacts (particularly at locations with significant existing air pollution); and • Road damage (based on the disproportionate damage that vehicles with heavy axles cause to the road surface, review if stronger policies can be introduced with respect to vehicle routing and to recoup the cost for road maintenance). <p>These policies should be strengthened such that these aspects have a material impact both on the planning process, as well as subsequent enforcement. The Minerals and Waste Local Plan must set in place a policy framework that leads to the climate impact, road safety impact, air pollution and road damage due to Surrey's minerals and waste related transport movements to reduce going forward. This should follow the 'Avoid, Shift, Improve' policy framework set out in Local Transport Plan 4 and fully align the strategy to the greenhouse gas emission reduction targets in the Surrey Climate Change Strategy (noting interim targets for 2024, 2030, 2035 and 2040 should fit with this Minerals and Waste Local Plan timescale) as well as specific policies in Local Transport Plan 4.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 53 – Communities Option One “Maintain the established policy approach.”

Unique ID Reference	Summary of Issue	Response
CR43, CR46	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR50	Considers that a simple approach relying on proven policy is best, and that multiple policies and relying on Local Planning Authority policy is likely to be overly complex and confusing.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Comments that option 3 is not considered appropriate as local plan policies are unlikely to cover matters of detail associated with minerals restoration such as bird strike risk, and therefore either option 1 or option 2 would appear to be more appropriate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR59	Considers that this appears to be the most appropriate policy and best suits the protection of communities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR16	Protection of communities will be achieved through the avoidance and management to acceptable levels of a range of potential impacts which would best be addressed through a broad policy covering these issues, otherwise there is likely to be duplication and potential confusion.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Considers that this takes a pragmatic approach and would avoid policy repetition. The policy should be positively worded and support development where it is demonstrated that potential impacts on communities can be avoided or mitigated to acceptable levels. It would also be helpful to reference the benefits which are provided through restoration schemes, such as enhanced access to public rights of way networks and areas and features of biodiversity interest.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR33	Considers this approach is pragmatic and proportionate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 54 – Communities Option Two “Multiple policy approach.”

Unique ID Reference	Summary of Issue	Response
WR8	Selected this option without justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR23	Considers that there needs to be stronger protection of communities, and that they need more say when it comes to plans for mineral extraction.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers that this could provide the most protection, however states that it will be subject to the final wording of the policy and its supporting evidence.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	States that different types of minerals and waste development have very different impacts on communities and therefore separate policies would be most appropriate. However, the detailed matters to be covered by these policies should draw on the relevant policies set out in the district or borough local development plans.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR46	It ensures that strategic and detailed impacts are considered for both minerals and waste management development, whereas for option 1, although it covers a range of environmental matters which is positive, limits this level of consideration to minerals development.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR48	Considers this would represent an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the impacts of minerals and waste management development on our local communities. The protection of communities from the nuisance impacts of minerals and waste management development, and the creation and enhancement of publicly accessible greenspace, are topics of sufficient detail and size to warrant consideration in distinct policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR51	States that it is important to ensure that the impact on residents remains a primary concern. Considers that human and ecological receptors whilst impactful in combination, should also be considered separately when assessing these. States restoration plans should be used to set out the benefits to be secured and tied to the end of the workings of the site in a timely fashion to ensure they can be brought forward as quickly as possible. States there remain several sites which have had further permissions, and this has pushed the date for restoration back, delaying benefits being secured for residents.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR54	Selected this as it includes policy on enhanced guidance for the creation of publicly accessible greenspace in the restoration policy. Suggests that the final sentence should include the words "enhance the guidance given on the creation of publicly accessible green space and public rights of way".	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 55 – Communities Option Three “Single strategic policy approach.”

Unique ID Reference	Summary of Issue	Response
CR6	Considers it is a more local based consideration within a broad national policy framework.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
CR9	Wishes to see the Green Belt maintained.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR18	Considers that it gives the most consideration and protection, and comments that local councils have the best knowledge of their local areas.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR36	Selected this option with no justification.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR12	Provides for a broader scope of protection and limitation as opposed to mitigation of determined sites replacing green spaces, rights of way, or impact communities. This option will require considerable investment in borough and district councils to monitor policies and add site specific conditions. Local policies should have equal weight alongside Surrey County Council's strategic policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 56 – Communities Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR39	Did not select an option for the question regarding communities, and comments that there may not be adequate local knowledge for option 3 to work. Considers that a team approach with seconded personnel might be possible but considers that there is insufficient information to choose an option.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR12	Regarding other approaches that should be taken, there should be limitation and prevention of use of sites in specific circumstances for the protection of natural habitats, and there should be a requirement to manage the overall amenity of the surrounding contextual landscape, not just the site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR37	Any policy needs to be updated to include an 'agent of change' approach to safeguarded, allocated and existing sites to ensure that they can operate without complaints of noise, hours of working etc.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR48	Consideration should be given to the extent to which the creation and enhancement of publicly accessible greenspace is covered in both the site restoration policy and the sustainable design policy. If there is insufficient additional value to be provided in developing a distinct policy on the matter, the Minerals and Waste Local Plan may benefit from either a distinct policy that draws in the requirements previously set out in the alternative policies or covering the remaining policy requirements in this area within the broader detailed communities policy. This would essentially comprise option 2, but within a single detailed policy.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR54	Agrees wholeheartedly with the contents of the Communities section in particular paragraph 89.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR54	In paragraph 91, support should also be given for the provision of additional bridleways as these have built in multi-user properties.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.