

## Review of Minerals & Waste Development Scheme 2014

### Background document

### Conformity of the Surrey Minerals Plan with the National Planning Policy Framework (NPPF)

The Surrey Minerals Plan comprises:

[The Minerals Plan Core Strategy DPD 2011](#)

[The Primary Aggregates DPD 2011](#)

[The Aggregates Recycling Joint DPD 2013](#)

This document assesses the continued soundness of the Plan when compared to changes in government policy and in particular the NPPF.

### The Minerals Plan Core Strategy adopted 19 July 2011

The Core Strategy sets out the vision, objectives and spatial strategy for mineral development to 2026 incorporating specific policies on silica sand, brick clay and oil and gas, together with generic development control policies. It also identifies preferred areas and areas of search for silica sand and brick clay extraction. The proposals map identifies Mineral Safeguarding Areas, preferred areas and areas of search.

Public hearings for the Core Strategy and Primary Aggregates Development Plan Documents were held between October 2010 and January 2011.

The inspector's report<sup>1</sup> concluded that:

*"The Surrey Minerals Plan Core Strategy Development Plan Document provides an appropriate basis for the planning of the County over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered."*

The Minerals Plan Core Strategy was recognised by the RTPI as:

*"An exemplar for the thoroughness of its evidence base and research. This exemplar plan has a clearly explained methodology for sub-regional apportionment and an 'after-care led' approach."*<sup>2</sup>

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<sup>1</sup> See [Inspector's report](#) on the examination into the Surrey Minerals Plan Core Strategy DPD 23 May 2011.

<sup>2</sup> Royal Town Planning Institute SE Spatial Strategy Award 2011

## **The Primary Aggregates DPD adopted 19 July 2011**

The Primary Aggregates DPD sets out the policy framework to address the need for provision of sharp sand, gravel and soft sand in Surrey. It also identifies preferred areas to meet the need for primary aggregates, which are shown on the proposals map, and contains policies for controlling primary aggregate extraction.

The Inspector's report<sup>3</sup> concluded that:

*“The Surrey Minerals Plan Primary Aggregates Development Plan Document provides an appropriate basis for the planning of the County over the next 15 years. The Council has sufficient evidence to support the preferred areas identified and can show, in almost all cases, that they have a reasonable chance of being delivered.”*

## **The Aggregates Recycling Joint DPD adopted 12 February 2013**

The Aggregates Recycling Joint DPD sets out proposals with regard to the provision of aggregate recycling facilities across the county for the period up to 2026. It lists existing temporary and permanent aggregates recycling facilities and identifies potential new sites.

The NPPF was published during the course of the public examination (March – June 2012). As a result the Inspector specifically requested<sup>4</sup> that the council prepared a supplementary self-assessment relating to the consistency of the plan with the NPPF<sup>5</sup>. The council also included in its proposed main modifications a new policy (numbered AR1) which includes an explicit presumption in favour of sustainable development.

Based on the NPPF the inspector identified his role as being to assess whether the Plan had been prepared in accordance with the Duty to Co-operate; legal and procedural requirements; and whether it was “sound”. To be “sound” – a plan should be positively prepared, including being based on a strategy which seeks to meet objectively assessed development and infrastructure requirements; justified, in that it should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence; effective including being deliverable; and consistent with national policy, enabling the delivery of sustainable development in accordance with the policies of the framework.

The Inspector concluded that the Plan was “sound” in accordance with the NPPF and that it therefore provides an appropriate basis for the planning of the county over the next 14 years.

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<sup>3</sup> See [Inspector's report](#) of the examination into the Surrey Minerals Plan Primary Aggregates DPD. 23 May 2011.

<sup>4</sup> See [Inspector's report](#) of the examination into the Aggregates Recycling Joint Development Plan Document for the Minerals and Waste Plans 26 November 2012

## **Environmental Assessment**

The Surrey Minerals Plan has been subject to thorough and comprehensive strategic environmental assessment (SEA) and sustainability appraisal (SA) throughout the course of its preparation. This process has informed the d-strategy and site selection.<sup>6</sup>

### **Assessment**

Both the Minerals Plan Core Strategy and Primary Aggregates DPDs were adopted prior to the Government publishing the NPPF in March 2012. It is therefore necessary to assess these plans against the NPPF – and in particular those changes that the NPPF introduces over previous planning policy relevant to minerals and waste planning.

In essence the NPPF takes forward policies and guidance contained in Minerals Policy Statements 1 and 2 and more specific technical advice in Minerals Planning Guidance. The main changes in emphasis relates to the need for the planning process to positively support sustainable economic growth.

The checklist below provides an assessment of the Minerals Plan DPDs and seeks to address the issue of the continued “soundness” of the Plan.

The evidence provided in the schedule strongly suggests that the Minerals Core Strategy and Primary Aggregates DPDs remain in conformity with the NPPF.

The Aggregates Recycling Joint DPD was examined and adopted in the light of the publication of the NPPF and is therefore judged in conformity with the NPPF at the time of adoption in February 2013.

This situation will continue to be monitored through the Local Aggregates Assessment (LAA) and Annual Monitoring Report (AMR) with a view to assessing the ongoing robustness of the plans in terms of the NPPF test of soundness. A proportionate response will need to be made in the light of changing circumstances since plans cannot be expected to remain 100% compliant when assessed against changing national policy and the local economic, social and environmental context.

### **Conclusion**

No immediate review of the three recently adopted Surrey Minerals Plan development plan documents is proposed as part of the review of the Minerals & Waste Development Scheme 2013. The situation will continue to be monitored through the AMR and LAA. Particular attention will need to be given to the exploitation of unconventional gas (shale gas) and developments in relevant government policy.

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<sup>5</sup> See Aggregates Recycling Joint Development Plan Document. [Assessment of compliance with the National Planning Policy Framework](#) August 2012

<sup>6</sup> See [Revised Environmental Report May 2010](#) and [Environmental Report for the Aggregates Recycling DPD](#)



# Surrey Minerals Plan

## Conformity with NPPF Self-Assessment Checklist

This assessment is based on the Soundness Self-Assessment Checklist produced on behalf of the Planning Advisory Service (PAS)<sup>7</sup> but does not slavishly follow its content since the minerals plan deals with specialist issues.

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<sup>7</sup> [Soundness Self-Assessment Checklist](#) (January 2013) AMEC on behalf of the PAS

## Positively Prepared

The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

NPPF Key Requirements	Evidence
<p><b>Does the plan adequately reflect the presumption in favour of sustainable development? (14)</b></p> <p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> <li>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or</li> <li>specific policies in the NPPF indicate development should be restricted.</li> </ul>	<p><b>Core Strategy &amp; Primary Aggregates DPDs</b></p> <p>The Minerals Core Strategy encourages; <i>“reducing demand for primary minerals by encouraging efficient use of resources and recycling materials, where appropriate, in preference to excavating new resources”</i>.</p> <p><b>Primary Land Won Aggregates</b></p> <p>The NPPF requires MPAs to prepare Local Aggregate Assessments (LAAs) annually, which will be based on a rolling average of 10 years sales data and other relevant local information and an assessment of all supply options. The LAA is in preparation.</p> <p>Surrey has been a significant source of land-won primary aggregates for many years and remains a net exporter of primary sand and gravel. However, due to environmental constraints, to maintain production of concreting aggregate at past sales levels is not a sustainable prospect beyond the plan period, a position confirmed by the Minerals Plan Inspector.</p> <p>The Minerals Plan makes provision for land won primary aggregates in line with the proposed changes to Policy M3 of the South East Plan (Policy MC7 and Primary Aggregates DPD PolicyMA1). This provides sufficient capacity to continue to supply demand in Surrey and surrounding areas until 2026 (based on average sales from the last 10 years) but towards and beyond this date it is likely that reserves will become close to exhaustion.</p> <p>Criteria based Policy MC11 introduces flexibility by allowing other sites for sand and gravel extraction to come forward where appropriate.</p>

NPPF Key Requirements	Evidence
<p><b>Does the plan adequately reflect the presumption in favour of sustainable development? (14)</b></p>	<p><b>Aggregates Recycling DPD (ARDPD)</b></p> <p>The ARDPD positively plans for an increase in the production of recycled aggregates in the County so helping to reduce dependency on land-won primary aggregates.</p> <p>It does so through site-specific allocations to meet the production targets in line with Policy MC5 of the Minerals Plan Core Strategy, and the spatial strategies set out in the adopted Waste Plan and Minerals Plan Core Strategy.</p> <p>The ARDPD recognises the need to build in flexibility over the timescale of the Plan to allow for a degree of unpredictability in the economy and the business intentions of industry and landowners. Policy AR2 makes provision for potential windfall developments.</p> <p>The monitoring framework for the Minerals Plan and Aggregates Recycling DPD together with the LAA provide a mechanism for consideration of remedial action should this be necessary.</p>

**Can the Plan continue to be justified?**

The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence

To be 'justified' a DPD needs to be:

- founded on a robust and credible evidence base involving: research/fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.
- The most appropriate strategy when considered against reasonable alternatives

NPPF Key Requirements	Evidence
<p><b>Can the Plan continue to be justified?</b></p> <p><b>Alternative spatial options</b></p> <p>What alternative spatial options were considered and were they subject to sustainability appraisal and public consultation?</p>	<p>Spatial options within a minerals plan are constrained by the geographic spread of potentially economically viable resources. The plan examined potential mineral zones (PMZ) for aggregates and for silica sand thoroughly as these represent the resources in greatest demand. There were a number of rounds of consultation at the early stages of plan preparation to discuss the outcome of the assessment of the aggregate PMZs and the development of spatial options.</p> <p>The Environmental Report sets out in chapter 2 the various stages of option assessment that were undertaken in the Strategic Environmental Assessment and Sustainability Appraisal of the plan.</p>
<p><b>Can the Plan continue to be justified?</b></p> <p><b>Concreting aggregates</b></p> <p>Is the strategy to concentrate mineral extraction of concreting aggregates on the river terrace gravels of the Thames in NW Surrey justified, founded on robust and credible evidence and the most appropriate strategy when considered against reasonable alternatives?</p>	<p>The river terrace gravels of the Thames in NW Surrey are the key source of sharp sand and gravel in the county. Although potential resources exist in the other main river valleys, notably the Blackwater, Mole and Wey, they have not been worked in recent times and operators have not shown interest in their potential.</p> <p>Sharp sand and gravel production has traditionally made up at least two thirds of total aggregate output in Surrey. The remainder is made up of soft sand, which serves a different market. NW Surrey therefore remains the most significant area in terms of potential resource for sharp sand and gravel for the plan period. There are no reasonable alternatives to the strategy other than to plan for a reduction in production below the regional guideline.</p>



NPPF Key Requirements	Evidence
<p><b><i>Can the Plan continue to be justified?</i></b></p> <p><b>Soft Sand</b></p> <p>Is the strategy to concentrate the extraction of soft sand on parts of south western and eastern Surrey, where there has already been extensive mineral working and where there are resources of other minerals, the most appropriate strategy when considered against reasonable alternatives?</p> <p>Is the strategy justified, founded on a robust and credible evidence base and will it be effective?</p>	<p>The exploitation of construction sands in Surrey has been confined to the Folkestone Formation within the Lower Greensand. This outcrops in a generally limited band just south of the scarp of the North Downs which broadens significantly in the west of the county.</p> <p>The Folkestone Formation is presently worked for construction sand in the Runfold area on the west of the county, at Betchworth in the centre and Moorhouse in the east. Silica sand is extracted from the same Formation at Buckland and at Bletchingley, the latter producing limited amounts of construction sand where sand is unsuitable for specialist use.</p> <p>The report into potential mineral zones identifies areas where economically viable resources are to be found. Extensive parts of the resource lie within the Surrey Hills AONB and the working of this for construction sands would not be in accordance with national policy when workable resources occur outside the designated area. The primary aggregates land assessment report shows how the original list of 106 potential mineral zones became the specific preferred areas identified in the consultation draft preferred option 2006 and the submission draft 2009. This is reiterated in chapter 2 of the Environmental Report.</p> <p>There are no suitable alternative resources of building sand within the county so this and the AONB limits the consideration of potential alternatives in future. The strategy will enable continued production of construction sands within the county at the same time limiting the potential environmental impact and is considered to remain the most effective solution.</p>

NPPF Key Requirements	Evidence
<p><b><i>Can the Plan continue to be justified?</i></b></p> <p><b><i>Silica Sand</i></b></p> <p>Is the strategy to identify a preferred area for silica sand working and an associated area of search justified? Is it founded on a robust and credible evidence base including evidence on need?</p>	<p>National advice indicates that a landbank of at least ten years should be maintained at existing workings. There are two existing workings in Surrey, at Tapwood, Buckland and North Park Quarry, Bletchingley, Deposits of silica sand in Surrey have a very limited geographic spread being confined to the upper reaches of the Folkestone Formation on the eastern side of the county. Resources around Buckland are limited and ownership and environmental issues restrict future opportunities here.</p> <p>The identification of a preferred area adjacent to North Park Quarry will support the landbank position there. The area of search in Nuffield Marsh gives an early indication of potential remaining silica sand resources, which may support the landbank in the longer term.</p>
<p><b><i>Can the Plan continue to be justified?</i></b></p> <p><b><i>Site selection</i></b></p> <p>Was the selection of preferred and safeguarded areas for minerals extraction the most appropriate given reasonable alternatives?</p>	<p>The 48 zones remaining after the initial sieve of 106 potential mineral zones (PMZs) were all looked at by the county council in open selection. The examination inspector considered this to have been a genuine exercise where they were treated equally and that the county council was not predisposed to any of the 18 sites finally chosen.</p> <p>The factors that influenced the judgement as to the zones to be selected for the preferred option are detailed in the Primary Aggregates Land Assessment Report and the 2010 Revised Environmental Report. They addressed the full range of impacts in an analytical way. Land ownership and mineral operator interest, as indicators of deliverability, informed the selection.</p>

**Does the Plan remain effective?**

The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

To be 'effective' a DPD needs to:

- Be deliverable
- Demonstrate sound infrastructure delivery planning
- Have no regulatory or national planning barriers to its delivery
- Have delivery partners who are signed up to it
- Be coherent with the strategies of neighbouring authorities
- Demonstrate how the Duty to Co-operate has been fulfilled
- Be flexible
- Be able to be monitored.

NPPF Key Requirements	Evidence
<p><b><i>Does the Plan remain effective?</i></b></p> <p><b><i>Flexibility</i></b></p> <p>Is the plan flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p> <p>Does the plan include the remedial actions that will be taken if the policies need adjustment?</p>	<p>The plan identifies preferred areas for future mineral working sufficient to maintain an adequate supply of minerals above existing permitted reserves whilst ensuring environmental impacts are minimised. In addition areas of search are identified which could meet shortfalls in supply should the need arise. The future supply of primarily aggregate – particularly concreting aggregate – will be tight towards the end of the plan period due to environmental constraints but flexibility is built into the plan with provision for increased supply of recycled aggregate and capacity to increase the importation of aggregates including marine sand and gravel and crushed rock.</p> <p>The AMR and LAA will ensure the situation is monitored</p>
<p><b><i>Does the Plan remain effective?</i></b></p> <p><b><i>Deliverable</i></b></p> <p>Does the plan continue to provide a framework for the delivery of a sustainable supply of minerals?</p>	<p>The Plan documents were prepared in consultation with the minerals industry and a key factor in site selection was interest from the industry and potential deliverability</p> <p>The AMR monitors the implementation of the Plan in terms of new planning permissions and the quantity of aggregate produced. The conclusion is that the Plan remains relevant and is being implemented.</p>

NPPF Key Requirements	Evidence
<p><b><i>Does the Plan remain effective?</i></b></p> <p><b><i>Co-operation</i></b></p> <p>Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</p>	<p>Co-operation with surrounding MPAs takes place through SEEAWP. SEEAWP will comment on Surrey's LAA to ensure it is robust and takes account of regional supply and demand.</p>
<p><b><i>Does the Plan remain effective?</i></b></p> <p><b><i>Monitoring</i></b></p> <p>Does the DPD contain targets, and milestones which relate to the delivery of the policies?</p> <p>Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</p> <p>Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</p>	<p>Targets for maintaining sufficient land banks are set by government and monitored through the AMR and LAA. Overall demand is predicted through the LAA and where necessary remedial action can be taken .</p> <p>The AMR monitors the impacts of planning permissions and the ongoing report on the ongoing active monitoring of minerals sites to ensure that mitigation measures are being appropriately implemented and maintained.</p>

**Is the Plan consistent with National Policy?**

The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

NPPF Key Requirements	Evidence
<p><b>Facilitating the sustainable use of minerals (142-149)</b></p> <p><b>Supply</b></p> <p>Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of aggregates (145) and industrial materials (146)</p>	<p>The matters of ensuring sustainable minerals supply has not changed in the NPPF and is dealt with in the Minerals Plan Core Strategy and Primary Aggregates DPD:</p> <p>Surrey’s Local Aggregates Assessment (LAA) is being prepared with participation in, and consultation with, SEEAWP.</p> <p>The Surrey Minerals Plan makes appropriate provision of minerals landbanks through:</p> <ul style="list-style-type: none"> <li>• Policy MC7 – maintenance of at least 7 yr landbank for sand and gravel</li> <li>• Policies MA2 and MA3 - landbanks for concreting aggregate and soft sand</li> <li>• Policy MC8 – Silica Sand supply and permitted reserves of at least 10 yrs for individual sites</li> <li>• Policy MC9 -Brick Clay supply and permitted reserves for at least 25 yrs</li> </ul> <p>The LAA and <a href="#">Annual Monitoring Report (AMR)</a> will monitor the supply of aggregate and industrial minerals and ensure the necessary remedial action is taken should supply fall below that which is considered sufficient. This through a review of the Minerals Plan if necessary.</p>

NPPF Key Requirements	Evidence
<p><b>Facilitating the sustainable use of minerals (142-149)</b></p> <p><b>Contents of plans</b></p> <p>In preparing Local Plans local planning authorities should (143):</p> <ul style="list-style-type: none"> <li>• identify and include policies for extraction of mineral resource of local and national importance in their area, but should not identify new sites...for peat extraction;</li> <li>• so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;</li> <li>• define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas;</li> </ul>	<p>See above – concreting aggregates and silica sand are particularly important local and national resources and relevant policies are included in the Core Strategy and Primary Aggregates DPD.</p> <p>Policy MC10 includes a presumption against peat extraction</p> <p>Surrey’s Aggregates Recycling Joint DPD takes a proactive approach to identifying suitable sites for aggregates recycling. The aim is to double recycling rates by 2016 (to 0.8 mtpa). Recycled aggregates can take the place of primary won aggregates in many situations where a lower grade material is required.</p> <p>Minerals safeguarding areas are included in the Surrey Minerals Plan 2011 under Policy MC6. District and boroughs are asked to include these areas in their own proposals maps and to consult as necessary. A revised consultation protocol is being produced in 2013 that will advise districts and boroughs when to consult the MPA in accordance with Policy MC6</p>

NPPF Key Requirements	Evidence
<p><b>Facilitating the sustainable use of minerals (142-149)</b></p> <p><b>Contents of plans</b></p> <p>In preparing Local Plans local planning authorities should (143):</p> <ul style="list-style-type: none"> <li>• safeguard: <ul style="list-style-type: none"> <li>- existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials; and</li> <li>- existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.</li> </ul> </li> <li>• set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place;</li> </ul>	<p>Existing rail heads in Surrey at Salfords and Woking are safeguarded in the Core Strategy under Policy MC16 – Rail aggregate depots. These will provide sufficient capacity for anticipated imports along with surrounding rail depots particularly in London. The Policy also allows for the positive consideration for new depots based on the merits of the proposals.</p> <p>Aggregates Recycling Joint DPD safeguards existing and proposed sites for the recycling of construction waste to form secondary aggregate.</p> <p>The great majority of mineral workings within Surrey lie in the Green Belt. Retaining independent processing facilities following the completion of mineral working would potentially conflict with the restoration of these areas and their long-term openness. Planning permissions are therefore usually conditioned to require the removal of all plant and associated hard standings. Concrete batching and manufacture of coating materials are not considered appropriate in the green belt although some mortar batching plants have temporary permissions associated with soft sand quarries.</p> <p>Other mineral development, including concrete batching or the manufacture of coated materials will fall to be determined under Policy MC14.</p> <p>Objective 2.3 of the Core Strategy is “ensuring prior extraction of mineral resources, where possible, if land is to be sterilised by other development”; and para 5.4 states that “The MPA will treat prior working as an important objective when consulted on development within a minerals safeguarding area which would otherwise result in sterilisation of the resource.”</p>

NPPF Key Requirements	Evidence
<p><b>Facilitating the sustainable use of minerals (142-149)</b></p> <p><b>Contents of plans</b></p> <p>In preparing Local Plans local planning authorities should (143):</p> <ul style="list-style-type: none"> <li>• set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip- and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;</li> <li>• when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction;</li> </ul>	<p>All environmental criteria listed in NPPF are covered by Policy MC14 –subject to following assessment of some issues:</p> <p>Human health is not explicitly listed but MC14 covers noise, dust, fumes and any other matter relevant to the planning application</p> <p>Tip and quarry stability, differential settlement of quarry backfill, mining subsidence : MC14 vii) refers to land stability. Para 6.31 refers to quarry stability and subsidence</p> <p>Impacts on the flow and quality of surface and groundwater and migration of contamination from the site: MC14 ii) refers to flood risk, potential impacts of dewatering, water quality and land drainage. Key development requirements require hydro assessment to cover all these aspects. Paras 6.11-6.14 of Core Strategy</p> <p>Cumulative effects of multiple effects from individual sites and/or a number of sites in a locality: MC14 x) refers to cumulative impacts between development but not to multiple effects from individual sites (see NPPF para 144, bullet 3). Nevertheless Policy states that impacts will be considered where relevant.</p>



NPPF Key Requirements	Evidence
<p><b>Facilitating the sustainable use of minerals (142-149)</b></p> <p><b><i>Contents of plans</i></b></p> <p>In preparing Local Plans local planning authorities should (143):</p> <ul style="list-style-type: none"> <li>• put in place policies to ensure worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources), geodiversity, biodiversity, native woodland, the historic environment and recreation.</li> </ul>	<p>The 'Surrey Approach' of restoration led mineral planning is often cited as best practice and is underpinned by several key principles enshrined in the Minerals Site Restoration Supplementary Planning Document</p> <ul style="list-style-type: none"> <li>• Targeting the end use</li> <li>• Being proactive as a regulatory authority</li> <li>• Partnership working</li> <li>• Promoting, recognising and rewarding excellence.</li> </ul>
<p><b>Facilitating the sustainable use of minerals (142-149)</b></p> <p><b><i>Planning for hydrocarbons</i></b></p> <p>Minerals planning authorities should also (147):</p> <ul style="list-style-type: none"> <li>• when planning for on-shore oil and gas development, including unconventional hydrocarbons, clearly distinguish between the three phases of development (exploration, appraisal and production) and address constraints on production and processing within areas that are licensed for oil and gas exploration or production;</li> <li>• encourage underground gas and carbon storage and associated infrastructure if local geological circumstances indicate its feasibility;</li> </ul>	<p>The Minerals Plan distinguishes between the three phases of on-shore oil and gas development (Policy MC12) and makes provision for underground gas storage where capacity and geological circumstances are proven to be suitable. Policy MC13 requires that there would be no significant adverse impacts.</p> <p>Unconventional gas (shale gas) has emerged as a potential significant source of energy supply since the adoption of the plan. The Government is producing technical planning guidance on shale gas in July 2013 to provide clarity around planning for shale gas during the important exploration phase for the industry. Core Strategy Policies MC12 – Oil and Gas development and MC14 – Reducing the adverse impacts of mineral development - provide the necessary criteria based policy guidance should any proposal come forward in Surrey.</p>

NPPF Key Requirements	Evidence
<p><b><i>Building a strong, competitive economy (paras 18-22)</i></b></p> <p>The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.</p> <p>The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</p>	<p>In planning positively for an adequate and sustainable supply of aggregate and industrial minerals the Local Plan supports economic growth.</p> <p>Supply will be monitored through the LAA and AMR and remedial action take as necessary.</p>
<p><b><i>Supporting a prosperous rural economy (para 28)</i></b></p> <p>Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development .</p>	<p>Minerals can only be worked where they are found and it would be inappropriate to claim that mineral development could be positively directed to rural areas for their economic benefit. However, allocated minerals sites do lie in rural areas and their development would generate benefits for the local economy by safeguarding jobs, supporting local operators and providing the raw materials for local development.</p>

NPPF Key Requirements	Evidence
<p><b><i>Promoting sustainable transport (paras 29-41)</i></b></p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p>	<p>Surrey currently imports crushed rock and some marine aggregates into the county by rail to two depots, which are safeguarded in the Minerals Plan (Core Strategy Policy MC16).</p> <p>The 2009 regional study, Aggregate Wharves and Rail Depots in South East England<sup>8</sup> identified potential depot sites for the future, but none within or near to Surrey. This supports the conclusion that there is no significant need for additional depots in the county at present. However, the Minerals Plan does not preclude the industry from bringing proposals forward if acceptable sites can be found and the need can be justified (Policy MC16 of the Surrey Minerals Plan Core Strategy).</p> <p>The Surrey LAA will continue to monitor the opportunities for the supply of minerals into the County via rail. The LAA will be prepared in collaboration with the South East Aggregate Working Party.</p> <p>The Minerals Plan was prepared in consultation with neighbouring authorities.</p> <p>Minerals Plan Core Strategy Policy MC15 and supporting text addresses all the requirements of paragraph 32 of the NPPF including the requirement for applicants to undertake a transport assessment.</p>

<sup>8</sup> Study of Aggregate Wharves and Rail Depots in South East England (SEERA) Feb 2009

NPPF Key Requirements	Evidence
<p><b>Protecting Green Belt land (paras 79-92)</b></p> <p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p>	<p>The principal approach to green belt policy has not changed significantly. The overall strategy of the plan remains appropriate.</p> <p>The Bury Hill Wood decision<sup>9</sup> raises an issue relating to the interpretation of green belt policy. The inspector applied a different and more severe test to the <b>exploration</b> of oil reserves citing NPPF paragraph 90 which suggests that it is only mineral <b>extraction</b> which is not inappropriate in the green belt. Europa is taking this case to the High Court in late July 2012. If the Inspectors decision is held this would in effect create a presumption against oil and gas exploration in the Green Belt and potentially require a policy change. In this situation a revision to national guidance may be required.</p>
<p><b>Meeting the challenge of climate change flooding and coastal change (paras 93-108)</b></p> <p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p> <p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<p>The Surrey Minerals Plan Core Strategy sets out the spatial strategy for the location of mineral development. Whilst acknowledging that the geographic extent of mineral resources limits the selection of preferred areas the drawing up of potential mineral zones did take account of transport infrastructure, flood risk and the potential of restoration and after-use to make a positive contribution to mitigating climate change impacts.</p> <p>The Plan gives priority to locating recycling development in urban areas and particularly in north west Surrey (Policy MC1) and other major towns and hence close to the sources of waste, so limiting the need to transport material over long distances.</p> <p>The policy framework of the Surrey Minerals Plans requires the impacts of development on biodiversity, open space and landscape, flood risk and air quality to be addressed in detail at the project level stage.</p> <p>Policy MC4 of the Minerals Plan Core Strategy encourages partnership working with local planning authorities to promote sustainable construction including the re-use and recycling of waste on the site where it is created and used so reducing the need to transport waste to an off-site recycling facility (para 4.9).</p>

<sup>9</sup> Appeal decision 26 September 2012 Link to [appeal decision](#)