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#### Table 1 – General Comments

Unique ID Reference	Summary of Issue	Response
WR6, WR9	States the River Thames Scheme, which will generate a huge mountain of gravel, is conspicuous by its absence from this section of the consultation documents. Asks why?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States the section on minerals supply and availability is hard for the layman to understand.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States minerals extraction is recognised as important to the local and National economy but must be carried out in a manner that is sensitive to local communities and to the environment: limited in scope to balancing need with landscape, biodiversity, and community protection rather than simple commercial and economic goals. It must prepare for recovery of the landscape and a net-gain in biodiversity after exhaustion of extractable resources and ensure the protection of roads, natural habitats and buildings affected by transport to and from extraction 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.
WR12	Considers the most important issues or challenges facing minerals development in Surrey are climate change and the climate emergencies declared by local authorities, and the prioritisation of security of energy supply.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	To address the issues or challenges facing minerals development in Surrey the scale and scope of planning authorisations that prioritise economies of scale over community and the natural/built environment must be limited. This may have some impact on commercial returns due to loss of economies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Given the climate emergency there should be an assumption of no hydrocarbon extraction and expect Surrey County Council to object to the issuing of licences.	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	A plan for restoration must be established simultaneously when the plan for extraction is submitted. There should be a minimum baseline number for restoration. Restoration parameters should be set and become a material consideration before extraction is permitted. The damage must be a factor when considering the application.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR14	Bargate stone has not been quarried since the 1940s, for the simple reason that its extraction is difficult and known to be uneconomic. It is also a relatively soft stone and often unsuitable for exposed surfaces, as it flakes easily. There are alternatives which are easier to extract, harder, less expensive, and more sustainable. These alternatives are currently used for the repair of and extensions to local properties, so it is surprising to read that bargate stone might be sought again. States that at an early-stage extraction of bargate stone would involve heavy and large vehicles. The impact of these in a rural area with narrow, unsuitable lanes would obviously be unwelcome.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR17	On 12 October 2021, the council debated fossil fuel extraction and resolved to "1) Record its commitment to reducing the extraction and use of fossil fuels and its opposition to further fossil fuel extraction in the District; 2) Reiterate this commitment in all future consultation responses relating to fossil fuel extraction; 3) Inform Surrey County Council, companies and organisations promoting the extraction and use of fossil fuels and local residents of this resolution; 4) Request Surrey County Council to consider not renewing existing fossil fuel permissions when any come up for renewal".	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR26	State they support Preferred Areas for sharp sand and gravel extraction at: Queen Mary Reservoir (existing) and King George VI Reservoir (Viable – application submitted).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR32	Strongly objects to mineral extraction close to residential areas. The impact of extra lorries and health issues to families is unacceptable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR38	States paragraph 6 refers Preferred Area A of the Primary Aggregates Development Plan Document – Addlestone Quarry Extension, New Haw. States paragraph 6 refers to Preferred Area A of the Primary Aggregates Development Plan Document 2011 – Addlestone Quarry Extension, New Haw. Figure 1 of this consultation document suggests that the status of this preferred area is 'not likely to be viable'. States they confirm that extraction from this area remains under review and may be viable and should continue to be identified in the Minerals and Waste Local Plan. At this time, they are focussed on the final extraction, filling and restoration of the main Addlestone Quarry site with active planning applications and timings to be agreed. Only when that has been resolved and works further advanced in completing the filling and restoration will they look at the extension 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.
WR38	States that in the context of Figure 2, site capacity figures provided for Addlestone Quarry are given as 100,000 tonnes per annum. However, the site is now confirmed to be operating at a maximum capacity of up to 250,000 tonnes per annum.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Recognises that in Surrey whilst some reserves remain in allocated sites and are yet still to come forward with a planning application or be permitted, – workable new sand and gravel resources will be more difficult to identify. For sand and gravel, consider the plan should focus on existing allocated sites, extensions, windfalls, and safeguarded reserves. Development over one hectare on safeguarded reserves should be considered for extraction prior to being sterilised by new development. The sand and gravel should where possible be extracted and sold as dug or processed at nearby production plants for higher quality product.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR41	Concern that any loss of a construction, demolition and excavation recycling and aggregate recycling sites within Surrey, will reduce availability of material of secondary recycled aggregates. Thus, stress the importance of maintaining productive capacity. Surrey should be looking to protect and preserve existing capacity. To do otherwise will impact on aggregate provision within the county, requiring additional imports from other areas to meet the shortfall. Hithermoor Quarry, near Stanwell Moor, is a key site for this and a Preferred Area should be designated to retain this facility. It should be clarified that 'very special circumstances' would be demonstrated if there are no alternative sites to continue recycling at Hithermoor.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR41	Argues that industry needs confidence/security of tenure at a location to invest in recycling and evolving technologies and convert to lower carbon sources. Surrey should be establishing key locations were this is expected to occur. Green Belt policy allows for certain activities to occur in the Green Belt where very special circumstances arise. Surrey should set out what is deemed to be very special circumstances. Think that there are very limited opportunities for recycling in non-Green Belt locations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR41	References a Mineral Products Association paper on recycling activities in the UK, and the fact that recycling capacity is reaching its limit. This reinforces the case for recognised and established recycling sites within Surrey to be identified as long-term, if not permanent, facilities to assist with the continuing and ever-increasing need for suitable sites to be retained, as land-won resources of primary aggregates are slowly diminishing.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 the overall approach for this section appears to follow that which exists currently. Its order and structure should be revised such that it is guided by overarching policy statements on climate change, circular economy, and restoration/enhancement. Policies on circular economy and recycling should precede and constrain policies on material extraction, not the other way around.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 the policy framework should shift from one that is primarily reactive and responsive to market demand to one that more actively constrains and manages demand to align minerals and waste operations with Surrey and UK climate targets and associated circular economy shift. This requires a fundamentally different approach to better govern minerals extraction and waste 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.

Unique ID Reference	Summary of Issue	Response
WR47	States a circular economy for minerals and waste in Surrey must reduce the overall rate of virgin production, increase the amount of reuse and longevity of product use in Surrey, and increase the quality of material recycling within the county. The focus therefore must be on quality first, quantity second. This will necessitate policies that lead to substitution of virgin materials with recycled materials, increase product reuse (and capacity to facilitate this in Surrey, including through refurbishment and repurposing activities) as well as overall building and infrastructure reuse. What is needed is to link this strategy, which sets out targets for the total amount of new materials, to a planning regime that delivers a whole life cycle strategy for buildings. 'Building passports' of how to take apart a building if it needs to be moved, repurposed or deconstructed in the future which will feed into saying minerals and reducing material use. This will mean that policies that restrict and constrain demolition, and more stringent requirements to locate new buildings in existing urban areas where the need for new infrastructure is minimised.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	[Response that is common to Q1, Q3, Q5, Q7, Q9 and Q15] All of the options proposed either start with the same or increase the level of material extraction in Surrey from the status quo. This is at complete odds with the policy statement, which talks about a transition to a circular economy. You cannot transition to a circular economy if the level of mineral extraction either remains unchanged or continues to rise. An additional option, based on a shift to a circular economy should be added. This will have a reduced rate of sharp sand and gravel extraction, soft sand extraction and need for recycled aggregates (including for concreting – see additional note below) against the Local Aggregates Assessment 2020 10-year average rate for 2010-2019.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Sharp Sand and Gravel Option One "Continue to meet the 7-year landbank required with sales at 0.34 million tonnes per annum."

Unique ID Reference	Summary of Issue	Response
CR6	This option is smaller. Comments that there is continued local infrastructure damage by using local transport routes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR68, 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.
CR38	States this is more sustainable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR40	Considers the options provided are meaningless to the public and that the question is weighted towards Surrey County Council's desired outcome.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	It requires the least gravel 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.
CR23	Considers that Surrey County Council should challenge the 7- year landbank requirement and put in place a strategy for Surrey that ensures the need for gravel and sand extraction is minimised in accordance with the declaration of a climate emergency.	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
CR57	States that this option is broadly supported provided it meets local needs, and that locally sourced aggregates will help to reduce carbon emissions.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Due to evidence of past sales over a 10-year period.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers it is impossible for the county to increase the scale of production without causing major damage to both the communities and natural environment. Northwest Surrey is a heavily built up are and the landscape is already altered by large scale quarrying. It must be recognised that extraction cannot go on indefinitely. The shortfall will have to be met by imports or more recycling of building materials.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR41	States this is the most realistic option which seeks to continue to meet the seven-year landbank figure for the duration of the Minerals and Waste Local Plan with sales at 0.34 million tonnes per annum (Local Aggregates Assessment 2020 10 – Year Average Rate for 2010 – 2019). Options 2 and 3 promote increases in the assumed sales rate (respectively 0.39 million tonnes per annum and 0.59 million tonnes per annum) when calculating the seven-year landbank and this approach is not 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.

Table 3 – Sharp Sand and Gravel Option Two "Continue to meet the 7-year landbank required with sales at 0.39 million tonnes per annum."

Unique ID Reference	Summary of Issue	Response
WR40	States it is important to build in flexibility but using peak sales may not be appropriate and these are unlikely to be sustained in the long-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.

Table 4 – Sharp Sand and Gravel Option Three "Continue to meet the 7-year landbank required with sales at 0.59 million tonnes per annum."

Unique ID Reference	Summary of Issue	Response
CR50	States that the most recent Local Aggregates Assessment recommends a level of 0.5 million tonnes per annum, and only option 3 reflects this. Considers productive capacity needs to be maintained to achieve this supply level and given that this is an average figure to do so a productive capacity of at least 0.75 million tonnes per annum will be required. States supply has been constrained by a lack of resources, and recent new permissions will take a couple of years to come on stream due to the clearance of planning. Several planning applications are outstanding for new sites, and it is anticipated that an increase in supply may be achieved.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States that councils in Surrey are proposing to increase housing numbers by nearly 100,000, and there is also a proposed increase in infrastructure and commercial development. Ask how these have been factored into 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.

Unique ID Reference	Summary of Issue	Response
WR16	Option 3, at 0.59 million tonnes per annum is closer to the Local Aggregates Assessment rate than the other options and would provide for additional flexibility and provision to be made should demand increase further as indicated by National forecasts of demand including those recently considered by the Mineral Products Association. The reference in the options to 'meeting the 7-year landbank figure for the duration of the Minerals and Waste Local Plan' should be clarified as meaning that reserves of between 2.1 million tonnes (0.34 million tonnes per annum) and 4.13 million tonnes (0.59 million tonnes per annum) will need to be maintained throughout, including at the end of the plan period. Capacity to supply at the annual Local Aggregates Assessment rate will also need to be 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.
WR16	The Local Aggregates Assessment refers to significant increase in reliance on imports as resources in Surrey are constrained by Green Belt and environmental designations. However, the source of such imports, and quantification of the reliance over time on these, is not identified. This approach risk under-provision and supply, and potentially long-distance movement of material by road from producing areas with associated environmental impacts. Mineral extraction is not inappropriate in Green Belt where openness is preserved, and major development within and affecting Areas of Outstanding Natural Beauty can occur in exceptional circumstances, and so neither of these types of designated areas are 'no-go' for minerals provision.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 provides for flexibility in identifying new sites and extensions to exiting sites as opportunities arise.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR22	Considers this option is most likely to ensure that likely increases in demand for sharp sand and gravel 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.

### Table 5 – Sharp Sand and Gravel Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR20	Did not select an option, and questions how a changing climate is factored into the Mineral and Waste Local Plan's assumptions regarding suitable land, as states most or all sites highlighted are in flood zone areas or close to populations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States that as alternative solutions using identified sources are sensitive, time will be required to mitigate issues or source of sharp sand and gravel outside the 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.
WR39	Support the development of varying options and the continuation of meeting need for a steady and adequate supply.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States the options proposed for future sand and gravel supply are unclear in their justification. The Issues and Options text appears to suggest identification of the quantity of possible nature conservation unconstrained sand and gravel resource – which should then be allocated, together with the remaining allocated sites which have not received planning permission.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States an assessment should be made of future demand for sand and gravel aggregates based on economic growth, infrastructure and public service provision and housing provision over the plan period. The shortfall in the availability to meet these reserves can then be identified and – discussion made in relation to how the shortfall be met in part by imports and recycled aggregates.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States that if Surrey is unable to meet its future sharp sand and gravel requirements, there should be some recognition that this shortfall to supply should be balanced by a contribution to soft sand provision in the region. Surrey has considerable unallocated soft sand reserves as the paper highlights. This reserve sits within and outside of the Area of Outstanding Natural Beauty.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR41	States concern that it cannot be assumed that operations will continue at Addlestone Quarry or that it would be practical or viable to extend the operations in this locality. Such matters should be taken into account, including that Addlestone Quarry has largely been worked out with only a nominal tonnage of remaining mineral resource and some parts of the site have been backfilled and restored, when carrying out the robust assessment of whether or not to allocate any potential Mineral Safeguarding Area for this site and/or any adjoining land.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 the sections do not state whether the amount of sharp sand and gravel that can be provided in Surrey includes that which is recycled. To align to the circular economy, statement the amount that is recycled should be prioritised before considering the amount of new virgin material is required. And the amount that demand can be reduced, including through reuse of existing infrastructure, buildings and product should be maximised before recycling product (e.g., following demolition) down to constituent materials. Thus, this policy should start with policies that govern salvage and retention of existing buildings and infrastructure, then proceed to policies concerning local high-quality recycling (into the same product) before proceeding to lower quality downcycling (e.g., crushing, chipping) into lower value/utility products and material for inert disposal, backfill or land-raising. This should frame and guide estimation of need, and policies regarding material extraction and waste processing. Thus, policies on renewable energy generation in Surrey should precede those related to non- quarry product related mineral extraction (oil and gas) and policies on how we intend to transition towards a circular economy in Surrey (to realise the aims of the circular economy statement) must precede policies regarding extraction. If the policies regarding renewable energy generation do not sit within the Minerals and Waste Local Plan they should be developed elsewhere in parallel and fully referenced 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.

Unique ID Reference	Summary of Issue	Response
WR47	States sharp sand is used as a main constituent for concrete. Concrete however is a high carbon material due not just to the embodied energy associated with sand extraction and transport but the high-embodied carbon of cement (due both to high temperature to burn limestone and the subsequent chemical process that releases carbon dioxide, that is progressively reabsorbed over 50-100 years). A Cambridge Research team recently proposed that concrete use is reduced in line with UK national decarbonisation targets (45% reduction by 2030). As sharp sand and gravel have a high use in concrete production then overall demand for these should be considered to similarly reduce for us to plan to reduce the carbon emissions of the UK economy in line with our international committed targets.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Did not select an option, as considers there is limited information provided in regard to benefits/implications. Recognises the need for a 7-year land bank to be maintained as required by the National Planning Policy Framework however states the fluctuations in demand and sales must also be considered. Raises concerns over the interaction between demand and supply and the continued working of sites beyond the original dates for restoration. Also raises concerns about the suitability of some of the sites that could be included and considers there has been limited consideration of 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 6 – Soft Sand Option One "Continue to meet 7-year landbank figure with sales at 0.4 million tonnes per annum."

Unique ID Reference	Summary of Issue	Response
CR6	This option is smaller.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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.
CR38	Considers this is more sustainable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR40	Considers the options provided are meaningless to the public and that the question is weighted towards Surrey County Council's desired outcome.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	This is the minimum option but considers Surrey County Council should seek to ensure that even this level is more than required. Further comment: states that as minerals are a finite resource, action needs to be taken now on the basis that there are limited minerals left for extraction. Raises concerns about other areas relying on Surrey exports.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 it meets local needs, and that locally sourced aggregates will help to reduce carbon emissions.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers this is most realistic but agrees with the assertion that the Area of Outstanding Natural Beauty boundary is likely to be extended and so even this figure is likely to be unachievable if the landscape is to be preserved.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Soft Sand Option Two "Continue to meet the 7-year landbank figure with sales at 0.456 million tonnes per annum."

Unique ID Reference	Summary of Issue	Response
WR23	Option 2 annual supply is lower than the 0.5 million tonnes per annum set out in Surrey Minerals Plan 2011 Policy MA1 to take account of the actual average sales over the past 10-years, but it makes reasonable allowance for an anticipated trend towards a sustained increase in sales, reflecting the successful operations at Mercers South. There is nothing to suggest that demand and sales of Nutfield Sand will decrease in the future and the slightly higher than the 10-year average annual production rate is supported to allow for the upward trend, to support sustainable growth. According to the Local Aggregates Assessment July 2021, the landbank for soft sand as at end 2019 was 5.86 million tonnes, which is equivalent to 14.7 years based on the Local Aggregates Assessment rate of 0.4 million tonnes per annum. Based on this lower annual production rate, the Local Aggregates Assessment states that soft sand production would continue to meet demand until around 2035. However, the reserves will have decreased still further in the past two-years and will not be sufficient to maintain an adequate supply for the emerging Minerals and Waste Local Plan period (to 2039/40). Without the replenishment of reserves, the landbank will fall below the minimum 7-years stipulated in the National Planning Policy Framework 2021, potentially around 2026/2027 (towards the end of the current Surrey Minerals Plan 2011 period) and sooner if the option 2 higher sales figure is 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.

Unique ID Reference	Summary of Issue	Response
WR23	States the permitted reserves at Mercers South are more substantial than estimated at the time of the Surrey Minerals Plan 2011 and the allocation of Mercers Farm as a Preferred Area for extraction of soft sand. There are also future resources within the wider landholding which have not yet been accessed and which are outside of the Area of Outstanding Natural Beauty. These include the proposed Eastern Extension. The Nutfield landholding will be the most significant supplier of soft sand in Surrey and one on which the county and region will depend to provide security of soft sand supply for the emerging Minerals and Waste Local Plan period and beyond. States they are happy to provide more detail to Surrey County Council on their reserve/resource position.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 it is important to build in flexibility but using peak sales may not be appropriate and these are unlikely to be sustained in the long-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.

# Table 8 – Soft Sand Option Three "Continue to meet the 7-year landbank figure with sales at 0.57 million tonnes per annum."

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.
CR50	Comments that the 3-year Local Aggregates Assessment trend is above the 10-year average which implies that the supply rate should be increased to reflect this trend. Councils in Surrey are proposing to increase housing numbers by nearly 100,000 and there is also a proposed increase in infrastructure and commercial development. Ask how these have been factored into 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.

Unique ID Reference	Summary of Issue	Response
CR59	Considers that with increasing housing demands, more flexibility and a higher soft sand provision needs to be recognised.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	The latest Local Aggregates Assessment (December 2021)	Comment(s) noted. Any issue(s) raised will be considered
	identifies that the 3-year average of past sales is 0.47 million	further and addressed as appropriate by the Minerals and
	tonnes per annum (also the sales figure for 2020 – an increase	Waste Planning Authority in preparing the Regulation 19
	of 7% in sales recorded in 2018, and of 26% on sales recorded	Draft Minerals and Waste Local Plan to be published in 2023.
	in 2011). The 3-year average of sales is 0.47 million tonnes	
	per annum, higher than the 10-year average, indicates that	
	supply needs to be increased above the 0.4 million tonnes per	
	annum rate as advised in Planning Practice Guidance. The	
	Local Aggregates Assessment identifies that housing	
	construction being planned for in Surrey in the short-medium	
	term (to 2031) will increase 35% over the 10-year average of	
	completions. Combined with a forecast increase in population	
	of 9% this would be expected to lead to an increase in demand	
	for soft sand used that is predominantly used in mortar for	
	housebuilding. However, the Local Aggregates Assessment	
	concludes that the 10-year average is the appropriate figure to	
	use as the 'Local Aggregates Assessment rate' and so does	
	not include an appropriate 'forecast of demand' that it is	
	required by the National Planning Policy Framework 2021.	
	Other Local Aggregate Assessments prepared by mineral	
	planning authorities in the Southeast and wider are proposing	
	rates above the overly simplistic 10-year average reflecting the	
	likelihood of planned housing and infrastructure resulting in	
	increased demand. Surrey County Council should be	
	approaching planning for aggregates, especially soft sand, in a	
	similar way. The Mineral Products Association produces	
	Economic Market Briefings for its members, the most recent	
	being issued on 28 February 2022. While at Great Britain level	
	and not including forecasts for soft sand demand specifically, it	
	does provide an indication of the direction and scale of growth	
	the economy, construction demand and the market for	
	aggregates in the short-medium term. It also illustrates how the	
	economy and markets have rebounded following depression	
	due to the Covid lockdowns of 2020 and 2021, including a	
	12.7% rise in construction output in 2021 with double digit	
	increases in sales for all major construction materials.	
	Forecasts for 2022 and 2023 include ready-mixed concrete	
	sales expected to grow by 3% in 2022, asphalt sales by 3%,	
	mortar by 4.5% and sand and gravel sales at 3%. The wider	
	regional (especially Southeast England and London) demand	

Unique ID Reference	Summary of Issue	Response
	for and supply of soft sand is also important, given that resources are limited in distribution with a large proportion and amounts located within protected landscapes including the South Downs National Park. The draft Statement of Common Ground on which the South East England Aggregates Working Party has been consulted recently, and to which Surrey County Council is a proposed signatory, is also relevant. It considers overall demand and supply, and the need for inter-authority provision and supply of soft sand to meet demand. In particular, East Sussex County Council and Brighton and Hove City Council are not planning to allocate any sites for soft sand and will be increasingly reliant on imports from other areas, including from other signatories to the Statement of Common Ground (Kent County Council, Surrey County Council, West Sussex County Council). London of course also has no soft sand resources or reserves and is a very significant market area. Therefore, making additional provision in Surrey, through applying a higher annual rate of 0.57 million tonnes per annum, is prudent and is required to properly reflect likely growth in demand and ensure that Surrey makes a full and appropriate contribution to local as well as the wider regional demands.	
WR22	States that of the three options it is the most likely to ensure that likely increases in demand for soft sand can be met. This is especially important in light of the decreasing number of opportunities for the supply of this material in the Southeast.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR41	States that making additional provision, through applying a higher annual rate of 0.57 million tonnes per annum is prudent and is required to properly reflect likely growth in demand and also ensure that Surrey makes a full and appropriate contribution to the wider regional, as well as local, demands.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Soft Sand Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR20	Did not select an option, and questions how a changing climate is factored into the Mineral and Waste Local Plan's assumptions regarding suitable land, as states most or all sites highlighted are in flood zone areas or close to populations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR30	Did not select an option, and comments that without knowing what areas would be affected percentage increases are meaningless.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Consider a policy for how to sustainably extend resources and mitigate impact on the Area of Outstanding Natural Beauty; and consider investing in research to identify future impacts on demand that affect policy for extending or replacing soft sand.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 there is a requirement to maintain a minimum landbank of 7 years' supply throughout the plan period. While the overall length of landbank appears reasonably healthy and above the minimum length at present, if additional reserves are permitted then the landbank will fall below the required minimum level within 8 years at best, or within 4 years if the highest rate (0.57 million tonnes) is taken forward. The plan needs to properly reflect this and the need to permit and maintain productive capacity (ability to supply the market) sufficient to deliver the elected rate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR17	Supports maintaining the permanence and quality of the landscape within the Area of Outstanding Natural Beauty. Furthermore, also supports work to expand the Area of Outstanding Natural Beauty where appropriate. In view of this commitment to landscape quality, would not support mineral working in the Area of Outstanding Natural Beauty.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR39	Support the development of varying options and the continuation of meeting need for a steady and adequate supply. Support the recognition that soft sand is becoming a regional 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.
WR37	Calls for a review of the unallocated reserve soft sand both within and outside of the Areas of Outstanding Natural Beauty to identify suitable future sites. Seeking sites where the extraction operation can be designed with embedded mitigation to minimise significant adverse impacts and where the restoration scheme can be designed to achieve and deliver climate change benefits, biodiversity enhancements or formal or formal recreational benefits. The need for soft sand in the region and any enhancements delivered through restoration in the right location and with a good operational design should be able to meet the criteria of National Areas of Outstanding Natural Beauty policy set out in 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.
WR41	States that while the current landbank appears healthy, for it to be maintained throughout the plan period, including at its end, additional reserves will need to be permitted in the short to medium 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.
WR41	States in order to maintain the annual rate of supply that is selected will also require ensuring that there is sufficient productive capacity, i.e., the ability to supply this amount of material to the market from extraction sites in 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.

Unique ID Reference	Summary of Issue	Response
WR41	States that as one of the small numbers of soft sand producing sites in the county, extensions to Moorhouse Sandpits would provide a sustainable and appropriate option for ensuring the steady and adequate supply of soft sand locally and regionally and in the long-term. The site has been operational for decades with no complaints or compliance issues, good access to markets and is within an area of the Areas of Outstanding Natural Beauty that accommodates development including the M25 and A25. The site is comprehensively screened by mature vegetation and topography and impact on the Areas of Outstanding Natural Beauty of small extensions would not be significant and be able to 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.
WR47	A significant use of gravel and soft sand is in road construction. A preventative approach to road maintenance that invests earlier in pothole filling such that less resources (and finance) are expended in complete resurfacing and reconstruction, together with reduction of the heaviest vehicles on non- strategic routes by Surrey highways would also reduce the demand for quarried materials in the county. This should be part of our strategy to decarbonise Surrey's highway maintenance operations as part of the new highways contract.	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.
WR52	States that options 2 and 3 appear to increase the level of quarrying above the 2020 Local Aggregates Assessment sales rate set out in option 1, with quarrying levels increasingly intensive. Due to the technical nature of this aspect and the National Planning Policy Framework 2021 requirement to maintain a landbank, reserve the right to comment on this further as the plan evolves and as necessary.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Need for aggregate recycling capacity Option One "An approach that is primarily driven by the need to have sufficient capacity to manage the levels of Construction, Demolition and Excavation waste that is expected to arise in Surrey and the surrounding area over the plan period, with targets for recycling and recovery equivalent to those that would have been taken forward in the Surrey Waste Local Plan 2019."

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.
CR50	Considers that policy should seek to manage this waste and provide sufficient capacity to do so. States that given that it is estimated that over 90% of the "hard" material (bricks, concrete, aggregates) are already recycled increasing supply will be difficult unless it is proposed to demolish more houses. States recycled material does not meet the higher end uses of sand and gravel and therefore can't be a direct replacement.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 as construction, demolition and excavation waste recycling rates increase and suitable alternative sites are not available, it is important to recognise the need to maintain and preserve the life of existing recycling sites, such as that operated by Brett Aggregates Limited. and Hithermoor Quarry.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 the production of recycled aggregate will be driven by the production and management of construction, demolition, and excavation waste. Recycled aggregate cannot substitute for all applications for which primary aggregates are used, and not for soft sand given the characteristics required for its use in mortar and asphalt. Mineral Products Association research indicates that recycled and secondary aggregates already contribute significantly to total aggregates supply in Britain (approaching 30%) but this is likely to be at or near the maximum as the vast majority of suitable material is already being 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.

Unique ID Reference	Summary of Issue	Response
WR23	States that construction, demolition, and excavation waste levels will drive the production of recycled aggregate. Recycled aggregate cannot be substituted for soft sand and land won resources will continue to be required.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR41	Selected this because the production of recycled aggregate will be driven by the production and management of construction, demolition, and excavation waste. Building sand cannot be substituted with recycled aggregate given the characteristics required for its use in mortar and asphalt, therefore option two would not conserve reserves of soft/building sand.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 11 – Need for aggregate recycling capacity Option Two "An approach that is primarily driven by the need to conserve remaining reserves of primary aggregate (particularly concreting aggregate) by increasing the amount of recycled aggregate produced per year above the 0.9 million tonnes target (for 2026) set in the Surrey Minerals Plan 2011."

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.
CR20	Considers there should be as much recycling as possible.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR30	Considers that this saves in many areas. Also comments that recycling should be the main method of usage.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
CR38	Considers that this is more sustainable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR40	Considers that there should be a strong emphasis towards recycling of material rather than depleting natural gravel resources. Also comments that as natural resources become scarcer, the impact of the extraction process on the local community will get worse.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 as much as possible should be recycled rather than used for infilling.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 12 – Need for aggregate recycling Option Three "Adopt a hybrid approach that combines the need to increase the resource efficiency of the wider economy with the need to manage remaining reserves of non-renewable mineral resources."

Unique ID Reference	Summary of Issue	Response
WR24	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.
CR6	Comments that Surrey County Council should take into account other sites outside the county boundaries in terms of capacity and materials.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	This option supports the approach to demolition and recycling of materials as advocated through Reigate and Banstead Borough Council planning guidance regarding sustainable development and reduction of 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.
CR58	Considers that maximising resource efficiency of the wider economy is a significant factor.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Supports an option along the lines of option three – that where possible recycled aggregates are recovered and used in construction and infrastructure projects. This recovery of previous material used for restoration will result in restoration projects for sand and gravel taking longer than previously anticipated – but this resource recovery is sustainable. This longer time period for restoration of sites, prior to aftercare and management will need to be reflected in the plan and proposals for 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.
WR40	States it should be ensured that the policy requires the amount of recycled aggregate produced to be increased as this is important for improving the sustainability of the county and reducing embodied carbon for new buildings.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers this strikes a fair balance between existing resources and demand. Also states that they only support the co-location of recycling facilities at existing mineral sites where the recycling supports the timely restoration of a mineral working. States there are problems where the recycling activity starts to take precedence over the restoration works and thereby leads to applications to extend the end date of final restoration and with significant delays to the provision of environmental enhancements or amenity benefits for residents. Gives an example of Stanwell Quarry where restoration had not been completed within the original five-year time period for restoration and a further temporary permission of ten-years was granted by Surrey County Council for a recycling facility of twice the size. States concerns over how the expansion of capacity could also impact on human receptors and gives the example of Oak Leaf Farm where the existing bund may not be sufficient to protect local residents from increased noise and activity. States an effective tie between co-location with a clear and shorter timeframe to restoration would be supported as an inclusion 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.

#### Table 13 – Need for aggregate recycling capacity Further/Other Comments

Unique ID Reference	Summary of Issue	Response
WR12	Consider a policy for how to design reduced road miles to recycling centres through rail networks, or optimising 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.
WR39	Queries whether option 2 is realistic as waste availability is based on construction, demolition, and excavation waste arisings. Policy should seek to maximise opportunities to produce recycled and secondary aggregate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Stresses the need to conserve primary aggregates for the most suitable uses and for recycled aggregates to be recovered and used or blended to extend the life of primary aggregates.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 14 – The improvement or expansion of existing aggregate recycling facilities Option One ""Provide for the general improvement or expansion of waste management facilities (including aggregate recycling facilities) through a policy like Policy 8 of the Surrey Waste Local Plan 2019."

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	Considers this would be appropriate given the clauses already contained within Policy 8 of the Surrey Waste Local Plan 2020. Considers that if additional policy clauses are felt to be required over and above Policy 8, then option 2 may need to be pursued. States that the continued inclusion of clause II from Policy 8 in any new policy is supported, which confirms that where extensions to existing facilities are proposed they should result in benefits to the environment and local amenity.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers Policy 8 of the Surrey Waste Local Plan provides for significant comfort in respect of extensions with these being time limited, therefore supports the continuation of this approach and would recommend taking forward Policy 8 into the Minerals and Waste Local Plan. States that to be effective, the use of Policy 8 in the new Minerals and Waste Local Plan would need to be done in conjunction with Policies 2 and 3 of the same. Also states that sites being subject to temporary permissions resulting in extensions to facilities is something that is a significant problem within Spelthorne. As many of the sites are within Green Belt, there are issues surrounding the impact on Green Belt and amenity for residents. Without the assurance of an effective policy to take account of the original reasons for permission being time limited then this will continue to be a recurring problem. Given the difficulty of finding alternative sites, there is the potential that those sites which have been extended through temporary permissions within the Green Belt could become permanent. Also states that it is understood and acknowledged that there are challenges in regard to capacity for recycling facilities. States they would consider that appropriate use of co-location would be a good means of assisting in meeting this capacity. However, states this should not be done unjustified or as a means of keeping a site open beyond its 'working life' where there is no suitable reason for doing so. If a site is used for mineral working with recycling facilities, then the primary purposes beyond the need for its use as part of mineral supply. When a site ceases to contribute as minerals site then its recycling use should also cease, and the agreed restoration scheme (or equivalent) should be implemented in a timely fashion to ensure betterment for local 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.

Table 15 - The improvement or expansion of existing aggregate recycling facilities Option Two "Provide for the improvement or expansion of aggregate recycling facilities with stipulating criteria which relevant development proposals would have to meet."

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.
CR30	Comments that the questions relate to a direction and do not give access to sufficient facts.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR38	Considers that this is more logical.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 materials should be recycled where possible and existing sites should be better used instead of creating new ones.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 the main issue is not the lack of current capacity, it is the replacement of capacity at temporary sites that policy needs to address. States this could be addressed by a combination of extensions at existing sites and the grant of new permissions at future mineral 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.
CR57	Considers that this option could meet local needs in a more positive manner unlike option 3 which is considered probably not acceptable in terms of National 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.

Unique ID Reference	Summary of Issue	Response
CR59	Ensures that future construction, demolition, and excavation waste recycling capacity is 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.
WR16	States this would enable the development and expansion of facilities which may not all be on existing 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.
WR23	Considers it would provide greatest flexibility to help maximise opportunities for the provision of construction, demolition and excavation recycling activity in the right locations, both existing and 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.
WR24	Questions why not also include residential permissions which involve demolitions?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Consider that there should be specific criteria which must 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.

Table 16 - The improvement or expansion of existing aggregate recycling facilities Option Three "Do not provide for the improvement or expansion of aggregate recycling facilities."

Unique ID Reference	Summary of Issue	Response
WR37	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.
CR6	Considers this would generate less traffic. Also considers that primary recycling should be got rid of where transport is disruptive and affects homes.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - The improvement or expansion of existing aggregate recycling facilities Further/Other Comments

Unique ID Reference	Summary of Issue	Response
WR22	States that option 3 is the least desirable as the recycling of aggregate should be encouraged and this approach would act to counter this. The National Planning Policy Framework 2021 expects aggregate to be recycled and this option therefore appears to be inconsistent 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.
WR38	Did not select an option but considers that whatever approach is adopted it should have regard to the fact that there is greater scope for improvement and expansion of facilities when they are permanent (as opposed to temporary) given the investment that needs to be committed to by the operator.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR39	States option 3 would not be consistent with Strategic Objective 4. Opportunities to improve facilities should 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.

Table 18 - Location of new temporary and permanent aggregate recycling facilities Option One "Provide for the identified need for recycling of Construction, Demolition and Excavation waste and production of recycled aggregate by allocating land to be developed as permanent facilities."

Unique ID Reference	Summary of Issue	Response
CR30	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.
CR40	Comments that it is not possible to decide without practical context.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Comments that this is assuming this leads to more recycling and the appropriate location of sites away from housing and other 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.
CR59	States that construction, demolition, and excavation waste recycling is going to be a permanent requirement, therefore, existing and established recycling sites are maintained and preserved.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Location of new temporary and permanent aggregate recycling facilities Option Two "Maintain the current Surrey Waste Local Plan 2019 approach (Policy 3), with a significant proportion (c.62%) of aggregate recycling capacity provided by temporary facilities located on land within established mineral workings."

Unique ID Reference	Summary of Issue	Response
CR6	Considers that there should be no new 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.
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	Given how recently the Surrey Waste Local Plan was 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
WR51	Supports co-location (as in Policy 3 of the Surrey Waste Local Plan 2020) given the dual uses that occur on site and the reduced need to find additional sites. However, states the issue of recycling taking precedence over the application of approved restoration schemes and applications extending the final delivery of these works is a significant problem. The approach through Policy 3 of the Surrey Waste Local Plan 2020 provides a strong basis for this issue and it being tied to the time limiting through Policy 8 means that both approaches from the Surrey Waste Local Plan 2020 are supported and should be carried forward into the emerging Minerals and Waste Local Plan. States they would not support new temporary or permanent facilities being in Spelthorne. States where possible, co- location should be utilised during the working life of the relevant sites and once no longer required, both uses should cease. States that where uses have been established on a site which go beyond the scope of an approved planning consent, they would expect suitable enforcement to be carried out to prevent these uses becoming lawful. States the issue of expanding recycling facilities by stealth is a major issue in Spelthorne and should be subject to the planning regime to ensure the uses are time limited and in appropriate locations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Location of new temporary and permanent aggregate recycling facilities Option Three "Adopt a hybrid approach that combines elements of options one and two to enable the development of a small number of new permanent Construction, Demolition and Excavation waste recycling hubs supplemented by temporary facilities on suitable land which may include mineral workings."

Unique ID Reference	Summary of Issue	Response
WR12, WR16, WR24, WR39	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
CR50	Considers the main issue is not the lack of current capacity, it is the replacement of capacity at temporary sites that policy needs to address. States this could be addressed by a combination of extensions at existing sites and the grant of new permissions at future mineral 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.
CR57	Considers this option would make use of recycling at existing sites but allow for the shortfall and reduce the incentive for minerals sites to continue without restoration of the site. However, considers that a robust approach to the identification of suitable sites will be required, and that closure of sites and changes in operating hours would need to take account of local opinion.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 it would provide greatest flexibility to help maximise opportunities for the provision of recycling infrastructure relative to need and markets. Facilities co-located with mineral workings play a vital role in the management of waste and delivery of best practice to recycle and recover materials. They enable sites to attract materials for the timely restoration of sites which are otherwise frequently diverted away to schemes with far fewer restrictions such as agricultural improvements, acoustic bunds, landscaping proposals and golf courses. There should be ongoing support for the retention of established and provision of new facilities at mineral workings alongside proposals for new permanent 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.
WR40	Suggest that a sequential approach should be taken where new facilities are only considered where capacity cannot be met at existing temporary 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.
WR50	Considers this could be further expanded to consider temporary and permanent facilities (as defined by the Environmental Permitting Regulations 2016, as amended) that are required on development schemes where there is a need to manage and treat waste materials over periods in excess of 12 months.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 21 - Location of new temporary and permanent aggregate recycling facilities Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR20	Did not agree with any of the options listed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR38	Did not select an option, but states that the approach adopted must have regard to the need to secure a greater number of permanent facilities and reduce reliance on temporary facilities. Permanent facilities allow greater scope for investment, improvement and innovation. Given the need for aggregate recycling facilities and the likelihood that Green Belt sites will need to be identified the strategic option must (as is the case in the recently adopted Surrey Waste Local Plan) ensure that it does not preclude the possibility of permanent aggregate recycling facilities at former mineral workings. Any such proposals would need to be considered on their merits and against other policies in the Minerals and Waste Local Plan – as is currently the position in the adopted Surrey Waste Local Plan 2020.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Need to safeguard existing rail aggregate depots Option One "Continue to safeguard existing rail aggregate depots as per Policy MC6 of the Surrey Minerals Plan 2011."

Unique ID Reference	Summary of Issue	Response
CR20, 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
CR30	Chose this option as option 2 is too general to have meaning.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR40	Comments that it is not possible to decide without practical context.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	In the absence of knowledge about potential alternative 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.
CR59	States that as land-won resources within Surrey are exhausted, it is critical to safeguard existing rail aggregate depots from alternative 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.
WR16	Considers this a hybrid approach to provide flexibility and enable expansion of 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.
WR18	Safeguarding of such sites is a requirement of the National Planning Policy Framework 2021 and sit in tandem with requirements under the 'agent of Change' principle for the onus to be placed on new development to ensure that it will not restrict the operation of existing businesses.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR22	States option 1 is preferred over option 2 as option 2 seeks to relocate existing rail depots which would most likely be a considerable challenge, due to the lack of opportunities for relocation, and therefore unlikely to be deliverable. Option 1 is also consistent with National planning policy and 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.

Unique ID Reference	Summary of Issue	Response
WR23	States the policy should also cover the requirements of the 'agent of change' principle.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Not aware of any suitable replacement depot locations within Waverley.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 these locations would continue to remain the most suitable in the county and would minimise disruption 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 23 - Need to safeguard existing rail aggregate depots Option Two "Encourage the relocation of existing rail aggregate depots to locations more suitable to industrial land-uses and activities. Areas of search for new facilities to be identified in the Minerals and Waste Local Plan."

Unique ID Reference	Summary of Issue	Response
WR12, WR24	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.
CR4, CR35	Considers that current location of the Woking depot generates unacceptable levels of 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.

Unique ID Reference	Summary of Issue	Response
CR6	Considers this would make better use of existing 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.
CR7, CR61	Considers that depots have adverse impacts on residents, and that depots should be located out of town.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 rail aggregates sites in town centres do not make environmental sense.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 Woking depot should continue to be safeguarded, though its ability to increase supply is limited. Considers the provision of new rail depots should be encouraged, however existing urban areas are unsuitable and urban fringe or rural sites would be required which would result in a conflict with Green Belt 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.
CR57	Comments that the retention of the Salfords Aggregates Depot does not seem feasible with major obstacles remaining preventing its 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.
WR1	States the existing rail aggregate depot in Woking town centre and adjacent to a residential area is in an unsuitable location, is unsafe, conflicts with the Victoria Arch widening scheme, and that the proposal to move the existing access as part of the Victoria Arch widening scheme so that vehicles make use of a residential area (Bradford Close and York Road) to access the depot is not acceptable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR5, WR31	Strongly supports options that encourage the relocation of the existing rail aggregates depot to locations more suitable to industrial land uses and activities. Areas of search for new facilities should be identified 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.

# Table 24 – Need to safeguard existing rail aggregate depots Further/Other Comments

Unique ID Reference	Summary of Issue	Response
WR12	States that the policy for relocation needs to take account of impact on local communities and be best located for redistribution to reduce ongoing road journeys in the county, particularly on rural roads.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States proposed policy option 2 is not deliverable. There are no alternative rail sites within Surrey (and beyond) where the existing rail aggregate depots can be relocated to. The alternative locations need to be adjacent to the rail network and the cost of signalling etc. for new sites is simply cost prohibitive; not a cost which Network Rail nor the council are prepared to commit to. Rail depots are required where the market is for the materials supplied and that is generally in built up areas or sites where there is good access to the primary road network. Asks where the council considers these new locations for rail aggregate depots are if they cannot be within urban areas/townscapes or Green Belt? Previous site searches have shown that they do not exist. As such, this option is unsafe.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	It is critical that existing rail depots and operations are fully 'safeguarded' not just in terms of the site being identified in plan form but in terms of how new development is considered in the surrounding area which could prejudice the future operation of their 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.

Unique ID Reference	Summary of Issue	Response
WR31	With reference to Woking, states that such large amounts of crushed aggregates and sand account for the serious amounts of particulate matter within the atmosphere as evidenced by the constant deposition of dust within the area. Feel that this is a totally inappropriate use of this land and the residents and users of the town centre and more importantly the surrounding residential neighbourhoods are likely to be suffering the health impacts of breathing in this dust continuously. The quality of life experienced by the residents has gradually fallen as the depot became busier. People that have lived for decades within the area report that historically the goods yard did not cause an impact to the community, but as its use increased the air quality and noise issues became more and more acute.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Concern that due to the safeguarding of the aggregates depot and its access coupled with Woking Borough Council's ambitions to widen the Victoria Arch, the residents within Bradford Close and York Road are now in danger of losing their homes and gardens through compulsory purchase so a new access road can be constructed to replace the road to be demolished as part of the infrastructure project. States the siting of the depot on another site is one of the only solutions to save the homes of the 32 families to be displaced and to improve the health and wellbeing of the remainder of the residents within a wide swath of densely packed housing. The community feels they have tolerated this polluting site for 40 years and now due to the busy throughput it is inappropriate and unsustainable for the yard to remain within the centre of one of the largest and busiest towns in 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.

Unique ID Reference	Summary of Issue	Response
WR31	Within paragraph 37 it is stated that there are comprehensive site management and operational measures in place to control emissions arising from rail aggregate depots. States in the case of Days Aggregates Yard there are few site management methods or operational measure to control emissions as has been shown by the paucity of planning permissions to secure safeguards to regulate emissions and noise. The retrospective applications for a sound barrier and a walled enclosure do little or nothing to alleviate the impact of the yard on the local populace. We welcome the acknowledgment that these adverse impacts are particularly acute in urban areas where sensitive receptors are in proximity and adjacent land-uses may not be compatible with industrial activities, however the document seems to imply that even higher levels of aggregates will be processed through the yard in the future.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR39	Considers an option 3 (combining both options 1 and 2) would allow for ensuring that future capacity is maximised, and to allow for each individual depot, to be considered on a case-by- case basis, whereby some may be best safeguarded, whilst some relocated. Where facilities do require relocation, the Minerals and Waste Local Plan should seek to ensure the sites remain safeguarded to allow their continued operation, until such a time that it has been relocated or alternative capacity provided.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Improvement and extension of existing and enablement of new rail aggregate depots Option One "Encourage the improvement and extension of existing rail aggregate depots."

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.

Unique ID Reference	Summary of Issue	Response
CR40	Comments that they cannot provide an informed answer as none of the options listed have practical context.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States that as resources and reserves of Surrey derived material decrease there will be a pro-rata increase in the demand for imported primary aggregates.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 locations would be the most suitable in the county and there should be scope for improvement.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Improvement and extension of existing and enablement of new rail aggregate depots Option Two "Don't encourage the improvement and extension of existing rail aggregate depots."

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

Table 27 - Improvement and extension of existing and enablement of new rail aggregate depots Option Three "Don't encourage the improvement and extension of existing rail aggregate depots but enable the development of new facilities in locations more suitable to industrial land-uses and activities. Areas of search for new facilities to be identified in the Minerals and Waste Local Plan."

Unique ID Reference	Summary of Issue	Response
CR4	Considers that current location of the Woking depot generates unacceptable levels of 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.
CR7	Considers that rail depots should be moved out of town centres to avoid adverse impacts on 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.
CR20, CR23	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.
CR57	Considers that this option may be more suitable across the county as the Salfords site already has a number of constraints which restrict growth options including the residential area to the north, poor access and an existing industrial estate.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States this is the only viable sustainable option if the residents' lives are to be made bearable and the impacts on health and the Green Belt are to be alleviated. Would go further than this and shut the aggregates yard its current location and identify a new facility which will not impact on human or biodiversity's health and wellbeing.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Improvement and extension of existing and enablement of new rail aggregate depots Option Four "Encourage the improvement and extension of existing rail aggregate depots and enable the development of new facilities in locations more suitable to industrial land-uses and activities. Areas of search for new facilities to be identified in the Minerals and Waste Local Plan."

Unique ID Reference	Summary of Issue	Response
CR6	Considers this approach is more flexible to meet 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.
CR20, 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.
CR35	Considers that the improvement of existing rail aggregate depots other than Woking may be more appropriate than relocation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR40	States that it would be beneficial to local communities to look for sites in more industrial 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.
CR50	Considers that a mix of options is most appropriate, and that there is little room to expand Woking and new sites 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
CR59	States that with an ever-increasing reliance on imports of primary aggregates, this option is seen as 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.
WR16	States it is the most appropriate option especially given the indication that there will be increasing reliance on imports and resources and reserves of sand and gravel with Surrey are depleted over time.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR22	States of the four options it is the most likely to ensure that imports of aggregate by rail are provided for. As some aggregate is transported long distances, typically from Somerset, it is important that rail depots are maintained and provided for to facilitate such imports by a more sustainable means of 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.
WR23	Considers it is the most pragmatic approach to facilitate the provision of infrastructure in response to the anticipated future increased reliance on imports.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers existing depots should be closed when made redundant by new 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.
WR39	States this would allow for improvements of existing infrastructure where possible, whilst allowing for new facilities to come 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.

Unique ID Reference	Summary of Issue	Response
WR47	States this policy should support a modal shift of freight transport, including for minerals and waste, from road to rail where possible. This is consistent with the Surrey Climate Change Strategy. Therefore, this policy should not choose between a policy of safeguarding the two existing rail aggregate depots against relocation to alternative sites but to increase rail freight utilisation across Surrey, through opening up new rail freight depots (potentially also for minerals and waste) alongside existing depot locations. The potential to safeguard – and to develop - more sites alongside the two existing locations should be investigated. This is consistent with option 4.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Improvement and extension of existing and enablement of new rail aggregate depots – Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR30	Questions why the options presume current locations are not suitable?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States it would be ideal if option 4 could be pursued but maintain that potential sites do not exist where these new rail aggregate depots can be built to cater for this additional demand, especially in light of the council's stance with regard to the location of rail aggregate depots 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.
WR18	Notes that paragraph 33 confirms that Woking hosts the principal (and only active) rail aggregates depot in Surrey. States this underpins the critical need to ensure its ongoing 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.

Unique ID Reference	Summary of Issue	Response
WR18	States paragraph 35 makes reference to Salfords and indicates that 'the depot is not operational due to access constraints and land ownership issues beyond the control of the Minerals and Waste Planning Authority'. Access and land ownership constraints have been resolved and Day Group are actively working to prepare the site for development. The Minerals and Waste Local Plan should ensure that the status of the site is correctly stated.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States that in the context of paragraph 37, which identifies issues which can arise with rail depots located in urban areas, the position with regard to Woking Rail Aggregates Depot is reiterated. The Depot has operated since the 1980s with minimal issue. Well managed rail depots can co-exist in urban areas. Safeguarding and mineral consultation areas are key to ensuring when new residential development comes forward that it is appropriately designed and mitigated so that amenity considerations are addressed, and the operation of the rail depot is not threatened. The approach taken at the Woking Site Allocation Development Plan Document Examination in Public, and as confirmed by the Inspector's Report, evidences the fact that rail depots and new residential development can co-exist.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	In the context of strategic options identified as candidate approaches for the Minerals and Waste Local Plan with respect to the need to safeguarded existing rail aggregate depots (paragraph 38), confirm their position again that the Minerals and Waste Local Plan must continue to safeguard existing rail aggregates depots as per Policy MC6 of the Surrey Minerals Plan 2011. Any option considering relocation should again be as per Policy MC16 with proposals for relocation of existing depots considered on their merits. Urban sites are not in themselves incompatible with rail aggregate depot uses. Indeed, options under paragraph 39 with respect to improvement and extension of existing rail aggregate depots may address any potential amenity concerns more effectively than relocation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Support option 1 or 4, depending on whether there are suitable locations for new facilities. The improvement or expansion of existing rail aggregate depots could lead to an increase in the amount of aggregates transported by rail which would reduce the impact of road vehicles, although it is recognised that transport by rail will not be feasible in all areas of 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.

Table 30 - Silica Sand Option One "Safeguard existing silica sand quarries and any previously identified extensions to their permitted areas of extraction to deliver as close to the 10-year landbank required by the National Planning Policy Framework 2021 as possible over the plan period."

Unique ID Reference	Summary of Issue	Response
CR20	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.
CR40	Comments that it is not possible to decide without practical context.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 no new sites should be opened in Surrey as most identified in the 2011 plan but not worked are located in inappropriate locations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States this will allow time to ensure proper safeguards are in place to protect areas given the scarcity of this commodity and taking into account the impact on the Green Belt, Areas of Outstanding Natural Beauty, Areas of Great Landscape Value, as well as countryside beyond the Green Belt. Strong policy is needed to subordinate commercial needs to protection of 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.

Unique ID Reference	Summary of Issue	Response
WR24	Selected this option with the proviso that sites be reappraised if within the Areas of Outstanding Natural Beauty extension 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.

Table 31 – Silica Sand Option Two "Safeguard existing silica sand quarries and any previously identified extensions to their permitted areas of extraction and allocate new land to be worked for silica sand to meet the 10-year landbank required by the National Planning Policy Framework 2021 over the plan period. Allocated sites to be identified in the Minerals and Waste Local Plan."

Unique ID Reference	Summary of Issue	Response
CR6, CR36, CR57	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.
CR38	Considers this option will damage the environment the least.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 sequential approach should be used so that the capacity of existing quarries is maximised before new sites are allocated and developed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Silica Sand Option Three "Safeguard existing silica sand quarries and any previously identified extensions to their permitted areas of extraction and identify areas of search within which new silica sand quarries could be developed to meet the 10-year landbank required by the National Planning Policy Framework 2021 over the plan period."

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

#### Table 33 - Silica Sand – Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR30	Cannot decide and asks what forecast usage is.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 a hybrid approach to proposed policy options 2 and 3 should be taken. A hybrid approach would be the most appropriate and provide the required degree of certainty and flexibility. However, safeguarding should be applied to known resources, not only to existing sites and potential extensions, in line with National policy and guidance. Safeguarding and allocation of sites does not deliver the minimum required stock of reserves required by National policy alone – that requires timely permitting of applications for reserves. National policy (paragraph 214 and footnote 74) requires that the stock of reserves is at least 10-years for individual sites reflecting the level of actual and proposed investment required for new and existing plant and the maintenance and improvement of existing plant and equipment, and up to 15-years where significant new capital is required.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR17	Supports maintaining the permanence and quality of the landscape within the Area of Outstanding Natural Beauty. Furthermore, also supports work to expand the Area of Outstanding Natural Beauty where appropriate. In view of this commitment to landscape quality, would not support mineral working in the Area of Outstanding Natural Beauty.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Did not select an option, but states that the policy should provide certainty and flexibility through the safeguarding of existing sites and extensions, retention of the existing Area of Search (Chilmead Farm) and potential strengthening of its status, as well as identify new areas as needed to enable the maintenance of a stock of permitted reserves in line with the National Planning Policy Framework landbank requirements. Did not select an option, but states that the policy should provide certainty and flexibility through the safeguarding of existing sites and extensions, retention of the existing Area of Search (Chilmead Farm) and potential strengthening of its status, as well as identify new areas as needed to enable the maintenance of a stock of permitted reserves in line with the National Planning Policy Framework 2021 landbank 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.
WR33	Chooses a combination of option 2 and 3. States this would ensure that silica sand planning applications can be assessed on the basis of a priority/locational criteria in preference of: Specific Site, Area of Search, development outside of these areas. This would help to direct development to sustainable locations in the event that Specific Sites are not deliverable or demand increases. The Specific Sites put forward by Sibelco do not provide North Park Quarry with a 15-year landbank, which adds greater importance on designating Areas of Search. This approach is consistent with Planning Practice Guidance Paragraph: 008 Reference ID: 27-008-20140306.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 this policy approach should be reflective of the national importance of silica sand and acknowledge that where significant new capital investment is required reserves of 15 years are necessary in accordance with footnote 74 of the National Planning Policy Framework. States this policy approach should be reflective of the National importance of silica sand and acknowledge that where significant new capital investment is required reserves of 15-years are necessary in accordance with footnote 74 of the National Planning Policy Framework 2021. Considers that development of some of the Specific Sites put forward will require significant new capital investment. Notwithstanding this, as set out in Planning Practice Guidance Paragraph: 090 Reference ID: 27-090- 20140306 calculating required stock should be based on previous sales and "the calculations should have regard to the quality of sand and the use to which the material is put." This should be a key consideration is allocating sites/areas within the Plan period to meet identified need.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States the comments of paragraph 42 appear to pre-determine the outcome of an assessment of the Area of Outstanding Natural Beauty that has not occurred. This is a worrying statement without any evidence to suggest that the Area of Outstanding Natural Beauty is worthy of being extended. Particularly in a landscape which includes two major motorways, a major international airport and proposed revisions to the Green Belt to accommodate large scale housing development in the form of garden villages. It also seems to overlook the National importance of silica sand.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR52	States that the two active quarries are located in Tandridge. Notes that this is recognised as a mineral of National importance but that it is found in relatively few areas, and the current landbank is anywhere between 5 and 10-years. Without understanding how near or far off the 10-year landbank target it is, and given its technical nature, reserves the right to comment on this further as the plan evolves and as necessary.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Brick Clay – Option One "Safeguard existing brick clay resources."

Unique ID Reference	Summary of Issue	Response
CR30	Questions whether bricks will be required for future environmentally friendly buildings?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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.
CR38	Considers this option is the most sustainable.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR17	States this option is best, particularly regarding Ewhurst Brickworks and South Holmwood Brickworks. All development, including minerals planning, should be plan-led and allowing for extensions could lead to piecemeal encroachment into the countryside. Should any extension to these works be required, they should be based on need which is assessed during the making of a plan and so any extension that is required can be safeguarded or permitted in a review of the 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.
WR24	States any extensions/ recommissions should be subject to environmental review and 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.

Table 35 - Brick Clay Option Two "Safeguard existing brick clay resources, enable extensions to existing quarries, and encourage the recommissioning of dormant clay quarries."

Unique ID Reference	Summary of Issue	Response
CR20	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	States we should be considering new modern methods of construction and reducing unsustainable building materials as part of this 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.
WR40	Suggest that a sequential approach should be used so that the capacity of existing quarries is maximised before new sites are allocated and developed.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 35 - Brick Clay Option Three "Safeguard existing brick clay resources and encourage the recommissioning of dormant clay quarries."

Unique ID Reference	Summary of Issue	Response
CR6	Considers that there should be no new 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.
CR40	States that it would be beneficial to make the most of what is available by recommissioning existing sites where practical.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers that if more clay is required, reopening dormant sites is less damaging than new 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.

## Table 36 – Brick Clay Further/Other Comments

Unique ID Reference	Summary of Issue	Response
WR12	Regarding other policy approaches that should be considered, states protection of rural amenity and landscape including where there is high concentration of Ancient Woodland and land beyond 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.
WR17	States the National Planning Policy Framework requires the safeguarding of locally and nationally important mineral resources but it is also the case that the long-term safeguarding of areas when there is no prospect of an area being worked stymies restoration. States the National Planning Policy Framework 2021 requires the safeguarding of locally and nationally important mineral resources but it is also the case that the long-term safeguarding of areas when there is no prospect of an area being worked stymies restoration. States the National Planning Policy Framework 2021 requires the safeguarding of locally and nationally important mineral resources but it is also the case that the long-term safeguarding of areas when there is no prospect of an area being worked stymies restoration. Surrey County Council has presented neither sufficient nor detailed enough information in the Issues and Options consultation to determine whether either of the dormant brickworks (Clockhouse Brickworks and Auclaye Brickworks) should be safeguarded. For example, Surrey County Council hints, without substantiation, that the Clockhouse Brickworks could be recommissioned but the facts are that it has not been operational for over a decade and there appears to be no prospect of it being worked in the future.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 location that bricks are currently sourced for use for the construction industry in Surrey should be confirmed. Until recently it would appear the UK imported a significant quantity of bricks. The establishment of brickworks should be carefully controlled from a planning framework as making of bricks requires a lot of energy, which is generally sourced from burning fossil fuels. Mining of clay should be used to support low-carbon production of low-temperature fired clay blocks or similar rather than permitting new high-carbon brick production in Surrey. This policy could support the use of unfired clay blocks and other sustainable building products as alternatives. The policy does not currently explore alternative building materials but seems to 'predict and provide' continued reliance on high-carbon building options. Unless the planning regime is used creatively to redirect the types of construction products available it will be a blocker to the action needed to transition to a circular economy aligned to climate targets. Thus, in addition to safeguarding brick clay resources policies that govern how these may be exploited in ways that are unfired/low-carbon should be included, as well as promotion of the resources underpinning other sustainable building products.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Chalk Option One "Maintain an approach consistent with that set out in the Surrey Minerals Plan 2011 (Policy MC10), that is a presumption against chalk extraction, no safeguarding of wider chalk resources, and safeguarding of the single existing chalk quarry in Surrey."

Unique ID Reference	Summary of Issue	Response
CR6	Considers that this approach maintains chalk habitat that is being lost.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
CR30, CR40	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	States they do not agree with the resumption of chalk mining.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 because of concerns on the environmental harm arising from the Oxted quarry, considers there should be no further chalk 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.

Table 38 - Chalk Option Two "A presumption against new chalk extraction and safeguard wider chalk resources for potential future need and the single existing chalk quarry in Surrey."

Unique ID Reference	Summary of Issue	Response
CR20, CR36, CR23, WR47	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	Selected this option for a presumption against chalk extraction but to safeguard wider chalk resources and the existing chalk quarry at Oxted for potential future need.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Chalk Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR57	Did not select an option and considers that more information about likely future need would be needed in order to answer this question usefully.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR52	Raises significant reservations about option 2. States chalk is a ubiquitous mineral in northern part of Surrey. The safeguarding of wider chalk resources has the potential to act as a significant constraint upon development both in terms of land-use and costs of development. Also states that it is recognised that demand for chalk is low and a question is raised as to whether there is a need for a chalk extraction site at all. However, supports the restoration of Oxted Quarry, at the appropriate time, given its location in a sensitive landscape coupled with the impact upon our residents arising from the volume and nature of the vehicular 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.

Table 40 - Fuller's Earth Option One "Maintain an approach consistent with that set out in the Surrey Minerals Plan 2011 (Policies MC6 and MC10), that is a presumption against the extraction of fuller's earth and safeguarding of fuller's earth resources."

Unique ID Reference	Summary of Issue	Response
CR6, CR36, CR23	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.
CR30	Comments that there is a lack of specifics.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States extraction of fuller's earth is a moribund industry and should not be resurrected.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR52	States this is the most pragmatic and flexible approach. States it would be helpful to understand if the process will also review the safeguarding parameters to establish justification, or if the current safeguards will simply 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.

Table 41 - Fuller's Earth Option Two "A presumption against extraction of fuller's earth with no provision for safeguarding fuller's earth resources."

Unique ID Reference	Summary of Issue	Response
CR20, CR40, WR24	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	Selected this for a presumption against extraction of fuller's earth due to the considerable environmental impacts that such extraction would cause and due to the remaining Surrey deposits being in or adjacent to the Surrey Hills Area of Outstanding Natural Beauty.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Fuller's Earth Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR57	Did not select an option as considers it is not clear what and where future need will originate. States that additionally, the Reigate and Banstead Borough Development Management Plan currently includes land west of the former Copyhold Works and adjacent to Patteson Court as a site for mixed uses and housing, for phased release under Policy MLS1.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Agree that there should be a presumption against extraction of fuller's earth but have no view as to whether this resource is scarce, and therefore whether it is appropriate for some of this resource to be safeguarded.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Peat Option One "Confirm the presumption against new peat extraction sites as per the National Planning Policy Framework 2021."

Unique ID Reference	Summary of Issue	Response
CR6, CR36, CR40, CR23, WR24	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.
CR20	Considers that peat should be protected.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 peat is an important carbon capture mechanism whereas its extraction and use would put more carbon back into the atmosphere and contribute to 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.

Unique ID Reference	Summary of Issue	Response
WR40	Suggest that this does not need to be a policy as it would simply be duplicating National policy. In addition to this, would like to see this combined with an approach that incorporates opposition to the use of peat in Surrey as well as its extraction, in line with Surrey County Council's climate agenda.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Peat Option Two "Do not include a specific reference to peat in the Minerals and Waste Local Plan, but instead rely on the presumption against new peat extraction sites as per the National Planning Policy Framework 2021."

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

Table 45 - Peat Option Three "Set out Surrey-specific reasons for resisting proposals for peat extraction, in addition to the National Planning Policy Framework 2021 presumption against such development and identify those areas of land within the County requiring specific policy protection in the Minerals and Waste Local Plan."

Unique ID Reference	Summary of Issue	Response
CR30, 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.
CR58	Considers this appears to be the most comprehensive approach to support the continued resistance of peat extraction in Surrey, which would include a local 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
WR47	Presumption against peat extraction is agreed. The strongest policy option to resist any peat extraction is preferred.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Peat Further/Other Comments

Unique ID Reference	Summary of Issue	Response
WR53	States that peatlands are a carbon sink, and therefore any option for planning for peat in line with the Government's commitment to achieve a target of 'net zero' carbon emissions by 2050, should have a clearer/firmer policy made on the cessation of peat extraction in 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.

Table 47 - Building Stone Option One "Maintain an approach consistent with the Surrey Minerals Plan 2011 (Policy MC10), that is no specific policy provision in relation to building stone but acknowledge, as per the National Planning Policy Framework 2021, the potential future need for the mineral within the context of a generic non-aggregate minerals policy."

Unique ID Reference	Summary of Issue	Response
CR36, CR40	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 48 – Building Stone Option Two "A criteria-based policy for the extraction of building stone, in particular for Bargate Stone. The policy would set out the broad circumstances in which the extraction of building stone may be considered acceptable."

Unique ID Reference	Summary of Issue	Response
CR6	Considers that this safeguards the Surrey protected heathland.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR20, CR23	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.
CR57	Considers supply should be limited to repairs to heritage assets in the county rather than being used in new development which has high carbon related emissions including the transport of such material. Overall, considers production should be limited to specified needs within the county, especially if sites for extraction are in environmentally sensitive locations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers option 1 is too broad and 3 is too specific.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Building Stone Option Three "A criteria-based policy for the extraction of building stone, in particular for Bargate Stone, as well as identify preferred areas for future extraction. Preferred areas are to be identified in the Minerals and Waste Local Plan."

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.
WR40	Selected this option if there is a potential future need for building stone and suggest that to ensure any need can be met in suitable locations, preferred areas should be identified 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.

### Table 50 – Building Stone Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR30	Asks why Bargate stone is specific?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Conventional Oil or Gas Option One "Maintain an approach consistent with the Surrey Minerals Plan 2011 (Policy MC12) covering all stages of conventional hydrocarbon exploration, appraisal, production, and decommissioning and restoration of well sites. This approach would not provide guidance as to how appropriate sites might be identified within each of the Petroleum Exploration and Development Licence areas in Surrey. Licence areas to be identified in the Minerals and Waste Local Plan."

Unique ID Reference	Summary of Issue	Response
CR20, CR36, CR23	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.
CR30	Considers that options 2 and 3 are open ended and avoid making a directional decision.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Conventional Oil or Gas Option Two "Establish separate policies relevant to each stage of conventional hydrocarbon exploration, appraisal, production, and decommissioning and restoration of well sites. Each separate policy to provide relevant guidance and criteria. Further policies could be established to identify Petroleum Exploration and Development Licence areas in Surrey and provide guidance for each area with respect to the identification of suitable well site locations."

Unique ID Reference	Summary of Issue	Response
CR68	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
CR40	Considers that separate policies enable the practical context to be taken into consideration more readily.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR60	Would like to push for some buffer zones between sites and residents. Gives reference to the recently approved and adopted Plan for Kirby Misperton.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR63, WR30	Considers that each stage requires consideration of 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.

Unique ID Reference	Summary of Issue	Response
WR40	Consider that separate policies are the most appropriate option but question how the Minerals and Waste Local Plan will support the transition to net carbon zero. Regarding conventional oil or gas state that once finalised the Minerals and Waste Local Plan will be extant for many years to come, therefore it is important that it thinks ahead and anticipates and reflects the likely direction of oil and gas development in the UK rather than taking a snapshot. Considers it clear that climate change mitigation and the decisive shift away from fossil fuels will be the dominant driving force behind policy development in this sector as is indicated in the 2020 Energy White Paper and the proposed oil and gas climate compatibility checkpoint. Crucially on 24 February the Governments own advisors the Committee on Climate Change for the first time came out in favour of a presumption against new exploration for oil and gas within the UK. Considers that whilst energy security will be an ongoing consideration this can best be served by rapidly transitioning away from fossil fuel dependence and developing domestic sources of renewable energy combined with a strong drive to manage and reduce energy demand, not by continued exploration for oil and gas. Urges Surrey County Council to reflect these points within all parts of the plan relating to oil and gas. Urges Surrey County Council to reflect these points within all parts of the Plan relating to oil and gas. Failure to do so risks a Plan which is very quickly out of kilter with National government policy and public opinion.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Proposes separate policies related to the different stages of well development (exploration, appraisal and production) as well as for decommissioning and restoration. It is proposed that this policy framework is strengthened such that permission is not sought or granted for these together or retrospectively (such as was the case when the developer at the current operational well in Brockham misled the council in claiming that drilling of side-track was not taking place). It is important that the planning rules and their adherence is set by the council as Minerals and Waste Planning Authority, not by developers running roughshod over the planning system. This applies both to permitting development and enforcement activities. As oil and gas activities occur underground it is important that activities are properly monitored and enforced and illegal operations and retrospective applications in Surrey are avoided going 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.
WR52	Supports the provision of relevant guidance and criteria which ensures that separate planning applications are sought at each stage. This allows for more scrutiny to ensure the best 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.

## Table 53 – Conventional Oil or Gas Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	Did not select an option, as considers that neither of them takes account of the phasing out of hydrocarbons.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
CR54	Considers that neither option is viable, and comments that to comply with the Paris Agreement and keep temperature rises below 1.5 degrees Celsius oil and gas should not be extracted and that there are already enough fossil fuels discovered to exceed safe limits on burning. Considers the UK is undermining its position regarding this if it continues to extract fossil fuels, and that Surrey County Council should be promoting renewable energy methods.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Did not select an option and considers that both options recognise the need to maintain a supply of oil/gas in line with National planning policy and government policy for energy security. States that as long as all relevant environmental and amenity requirements are included in line with National and local policy, has no preference in regard to how policies are cut. Considers policy should include all relevant considerations and remain focused for use by developers.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	States they cannot select any of the options as they have declared a climate emergency and it would be contradictory to support hydrocarbon extraction. States that many councils have declared climate emergencies that are in direct conflict with hydrocarbon extraction by any means. It should be recognised that there must only be very specific and extreme needs for hydrocarbons in support of National energy source security before licensing and permission under this policy can be permitted. Decisions should be made solely on energy security over commercial needs.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Considers neither of the options is acceptable. Option 2 could be amended to omit reference to exploration and appraisal so that existing sites would be covered. We should be reducing the use of fossil fuels and concentrating on renewable forms of energy. The processes in Surrey are extremely polluting, using a method of acidification, which is a form of unconventional extraction, and if we have to use hydrocarbons there are better reserves offshore. Surrey is too densely populated to be able to absorb a network of drilling locations. States the Horse Hill case outcome will be of interest in relation to new applications.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR30	States that given the longevity of the Plan once it has been approved it is crucial that it considers the probable future trend of National government policy, otherwise there is a clear risk that it will very quickly become out of date. With regards to oil and gas, the 2020 Energy White Paper (which supersedes the National Energy and Climate Plan referred to in paragraph 72), the proposed oil and gas Climate Compatibility Checkpoint, and the recent letter from the Climate Change Committee clearly indicate a decisive shift away from fossil fuels, reflecting their major role in contributing to global climate change. We would strongly encourage Surrey County Council to reflect on these points and to also refer to these more recent publications rather than the outdated Annual Energy Statement and Energy Security Strategy. Both these latter documents were written over ten years ago and with regards 3 to onshore fossil fuels refer to the potential strategic importance of unconventional shale gas (not conventional resources), the development of which has been significantly hampered by the 2019 moratorium	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR30	on fracking, and which are not likely to be found in Surrey. States existing Government policy and the likely direction it is traveling in does not support the notion that onshore oil and gas are important for maintaining national energy security as is indicated in paragraph 72. The 2020 Energy White paper: Powering our Net Zero Future presents the latest government thinking on how energy policy will develop in the coming years. Oil and gas is covered in chapter 6 which focuses almost exclusively on the large offshore sector and the objective of ensuring the UK Continental Shelf is a net zero emissions basin by 2050. The onshore sector is barely referred to. It is mentioned once in relation to its size relative to the offshore sector (on page 134), and once regarding the impacts of Covid- 19 on the industry (on page 135).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR30	States ensuring energy security is complex but continued reliance on fossil fuels is clearly not the answer. An emphasis on demand management and energy efficiency in conjunction with continued and increased development and deployment of renewable energy must instead be key planks of a national energy security 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
WR30	States that whilst there is an emphasis on what are considered to be the perceived benefits of oil and gas development there is no mention of the clear disbenefits of fossil fuel developments, aka that they are major contributors to climate change. We would urge the Council to rectify this and to recognise that their phase out is inevitable during the transition to net-zero. Indeed, oil consumption falls by up to 98% and gas consumption by up to 91% by 2050 under the Climate Change Committee's pathways. Over this timeframe net imports of oil and gas will also fall.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Highlights that paragraph 72 of the document focuses solely on the role that onshore oil and gas plays in supporting National energy security and refers to three Government strategies and policies. States they would strongly encourage Surrey County Council to reflect more on this section it is not considered that current Government policy nor the direction it is moving in supports this notion. Secondly, the Annual Energy Statement and the Energy Security Strategy referred to were both published over a decade ago and where onshore oil and gas is mentioned this is in relation to the potential strategic importance of unconventional shale gas. The extraction of these resources has now been constrained in England by the 2019 moratorium on hydraulic fracturing. The third paper referred to, the National Energy and Climate Plan, has been explicitly superseded by the 2020 Energy White Paper: Powering our net zero future. This new paper puts at its heart efforts to fight climate change and it evidences a decisive move away from reliance on fossil fuels. Strongly encourage Surrey County Council to include reference to this paper and its focus within the Key Issues section and to not refer to out of date Government policy. Thirdly, would also strongly encourage Surrey County Council to recognise that oil and gas are major contributors to climate change and that under pathways to deliver net-zero greenhouse gas emissions by 2050 the need for these resources will fall significantly as will net imports. Recognising this would create a more balanced approach to oil and gas development within Surrey and is not out of step with developing Government policy. Finally, under the Committee on Climate Change's pathways to net-zero, oil consumption falls by 84-98% and gas consumption by 50-91% by 2050. UK net imports are also expected to fall over this period.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 consultation document recognises that the oil and gas resources in Surrey are limited. However, no comment is given in the report as to how the location of these resources relates to wider oil and gas resources, or the climate constraints on the extraction of these resources. It is widely noted that to stay within the globally agreed limit of 1.5 degrees Celcius post-industrial temperature increase that we cannot exploit existing known conventional oil and gas reserves, let alone the far wider unconventional reserves that are known to exist. Globally there are already nine times more proven fossil fuel reserves than can be burned. In line with Surrey's Climate Change Strategy the council should adopt a policy that restricts the exploitation of oil and gas resources in Surrey on climate grounds. The reference in the consultation document to dated annual energy statements and security strategies should be subservient to the UK's climate commitment as well as the commitments made here in Surrey. The UK should reduce its dependence on imported oil and gas through decarbonising its energy supply and reducing the UK's overall energy demand to ensure that the energy supply can be fully decarbonised.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 Surrey County Council should include explicit consideration to the downstream greenhouse gas emissions in the planning policies that govern future oil and gas developments and ensure that this is included within the scope of Environmental Impact Assessments for such developments. States Surrey County Council should include explicit consideration to the downstream greenhouse gas emissions in the planning policies that govern future oil and gas developments and ensure that this is included within the scope of Environmental Impact Assessments for such 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.
WR53	States that they would be happy to provide comments and guidance in regard to the identification of suitable well site locations at any given time during the preparation of 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.

Table 54 - Unconventional Oil or Gas Option One "An approach tied explicitly to the extant Government position with reference to the development of unconventional hydrocarbon resources. This would allow for the possibility of unconventional oil and gas development in the future should the Government lift the relevant moratorium."

Unique ID Reference	Summary of Issue	Response
CR30	Considers that option 2 is based on limited isolated 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.
CR40	Considers this keeps options open for future technological advancements in extraction methods.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Unconventional Oil or Gas Option Two "An approach that takes account of the seismic sensitivity demonstrated in Surrey by the recent Newdigate sequence of earth tremors, and of the thresholds previously used to require the cessation of hydraulic fracturing operations at Preese Hall in Lancashire, to establish an evidence-based moratorium on the development of unconventional oil and gas resources in Surrey for the entirety of the Minerals and Waste Local Plan period."

Unique ID Reference	Summary of Issue	Response
CR6	Considers that this gives a moratorium on exploration.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR20, CR36, CR23, CR60, 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.

Unique ID Reference	Summary of Issue	Response
CR58	Considers that this safeguards Surrey's position into the future should the position of the Government 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.
CR63	Considers that to extract the resources under Surrey fracking will be required. Considers that a better understanding of the topic is needed, regarding what is conventional, what is unconventional and what will be needed to extract from Surrey. Consideration also needs to be given to whether you can require a full Environmental Impact Assessment for all oil and gas applications, whatever the size of site. Also considers that a much more balanced policy than MC12 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.
WR30	Welcome and support the intention of the Council to establish an evidence-based moratorium on the development of unconventional oil and gas resources in Surrey for the entirety of the Minerals and Waste Local Plan period as is described under Option two. Welcome and support the intention of Surrey County Council to establish an evidence-based moratorium on the development of unconventional oil and gas resources in Surrey for the entirety of the Minerals and Waste Local Plan period as is described under option 2. However, we would point out that Surrey County Council is not correct in thinking that there is a moratorium on unconventional hydrocarbon development as is stated in paragraph 84. The moratorium declared in 2019 is on the use of hydraulic fracturing. The government continues to advocate this moratorium. Unfortunately, this moratorium does not extend to other forms of well stimulation techniques such as matrix acidization and fracture acidization, and still leaves the door open for the exploitation of unconventional oil and gas. We would encourage Surrey County Council to read and consider how North Yorkshire's recently approved Minerals and Waste Joint Plan has addressed this 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.

Unique ID Reference	Summary of Issue	Response
WR40	Support this option due to both the evidence of seismic risks as well as the extraction of unconventional oil and gas being incompatible with Surrey County Council's declaration of a climate emergency and 'Greener Futures' plans. Support the intention of Surrey County Council to establish an evidence- based moratorium on the development of unconventional oil and gas resources in Surrey for the entirety of the Minerals and Waste Local Plan period as is described under option 2. However, should be aware that whilst there is a moratorium on hydraulic fracturing within England, which the Government have very recently restated their support for, there is not a national ban on unconventional oil and gas development per se or the use of other contentious well stimulation techniques (such as matrix acidization and fracture acidization).	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 there should be a clear presumption against the development of unconventional oil and gas resources within 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.

## Table 56 – Unconventional Oil or Gas Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR54	Considers that neither option is viable, and comments that fracking leads to many additional problems such as water supply problems, alongside complying with the Paris Agreement and keeping temperature rises below 1.5 degrees Celsius. Considers that there are already enough fossil fuels discovered to exceed safe limits on burning. Considers the UK is undermining its position regarding this if it continues to extract fossil fuels, and that Surrey County Council should be promoting renewable energy methods.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Did not select an option as considers that neither option fully addresses all issues set out. Considers that whilst fracking may be allowed under future Government policy, there should still be a need for evidence-based understanding of the environmental/safety, etc, implications within Surrey, which is not set out in option 1. Considers option 2 does require this but draws a conclusion in advance of the work (regarding an energy supply that may be needed to ensure energy security). Perhaps an option complying with the current moratorium, but requiring evidence-based understanding of need and safety/environmental implications to be undertaken at any such time as the government felt it necessary to utilise fracking as part of a National energy strategy? Considers this could set out stringent restrictions in regard to locations of environmental sensitivity, residential, business and community uses.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Object to both these options. There should be a firm policy of no unconventional drilling. As above, Surrey with its high population densities and environmental constraints is an inappropriate location for a web of drilling sites. There is also, as mentioned, the problems of seismic activities.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR30, WR40	States that in order to minimise confusion regarding possible planning applications in the future we would encourage Surrey County Council to use the definition of what comprises an unconventional oil and gas resource that can be found within "Acid stimulation: Fracking by stealth continues despite the moratorium in England". This states "we clarify the distinction between conventional and unconventional rock layers and explain the key concept of permeability. A low permeability (by consensus defined as less than 0.1 millidarcies) implies that 4 the resource is unconventional, meaning that it requires special methods to extract the resource. Above that value, conventional methods suffice."	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 there should be a clear presumption against exploitation of unconventional oil and gas resources in Surrey, the UK and globally for two reasons. Firstly, conventional resources already far exceed what can be utilised without locking-in dangerous climate change. Secondly, existing conventional resources (which have a lower extractive return on energy invested) so are worse in terms of direct emissions as well as leading to the same indirect emissions when the oil and gas is processed and/or burnt.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 there is currently a risk that oil and gas extraction that is unconventional in many respects (it is not free flowing but requires some form of stimulation to aid its extraction) is classed as conventional.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 57 – Underground Storage – Option One "An approach that provides for the underground storage of natural gas in suitable geological structures in Surrey."

Unique ID Reference	Summary of Issue	Response
CR36, CR60, CR63	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 58 - Underground Storage – Option Two "An approach that provides for the underground storage of natural gas or carbon dioxide in suitable geological structures in Surrey."

Unique ID Reference	Summary of Issue	Response
CR19, CR20, CR30, CR38, CR40, 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.
CR54	Comments that storing of carbon dioxide should be considered if it can be safely achieved in 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.
WR24	Does not know enough about it and the risks and infrastructure required, however, if appropriate and carbon dioxide does not have more disadvantages then option 2 is preferred.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 this appears to be in line 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.
WR53	Supports an option where the underground storage of all gasses including natural gas and carbon dioxide are considered in suitable geological structures in 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.

## Table 59 – Underground Storage Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR6	Did not select an option as considers that this should not take place as it is too dangerous.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Did not select an option. Comments that the National Planning Practice Guidance requires that the 'potential' for gas and carbon dioxide storage is considered as 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.
WR12	Does not believe there are sufficient opportunities for carbon capture in Surrey and states priority should be given to the reduction of carbon 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.
WR12	States storage should not be used as a mitigation for specifying further commercial hydrocarbon exploration and production. Carbon capture is in the early stages of development and there are no guarantees that it can be relied upon as a major factor within the lifetime of the 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.