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Table 1 – Safeguarding Minerals Resources Option One “An approach broadly consistent with Policy MC6 of the Surrey Minerals Plan 2011 by retaining Minerals Safeguarding Areas as currently defined.”

Unique ID Reference	Summary of Issue	Response
WR5	The council is of the view that the existing Policy MC6 of the Surrey Minerals Plan Core Strategy 2011 and Policy 7 of the Surrey Waste Local Plan 2020 provides a robust and, importantly, flexible approach to safeguarding, based on effective consultation. In this regard, option 1 under safeguarding mineral resources is supported: an approach broadly consistent with existing policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR24	Support option 1 as option 2 is too broad if takes into account only the geological resource and not environmental constraints. Supports excluding soft sand locations in the revised Areas 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.
WR42	Option 1 is broadly consistent with Policy MC6 of the Surrey Minerals Plan 2011 by retaining the Mineral Safeguarding Areas as currently defined but would be less preferable than option 2 in terms of safeguarding the county’s remaining reserves or potentially exploiting mineral resources including sharp sand and gravel based on the geological resource as identified by the British Geological Survey.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR42	Favours option 1 which is broadly consistent with the Policy MC6 of the Surrey Minerals Plan 2011 but subject to a robust review of the Mineral Safeguarding Areas, as opposed to relying on those currently defined in 2011. Such a review of the Mineral Safeguarding Areas would need to take into account whether potentially viable mineral resources are likely to be present, including from interested parties in the form of Mineral Resource Assessments in line with Surrey County Council’s Minerals Safeguarding Standard Advice Note.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Safeguarding Mineral Resources Option Two “An approach that provides for the safeguarding of the County’s remaining reserves of potentially exploitable mineral resources in terms of: sharp sand and gravel; soft sand (outside the Surrey Hills AONB); brick clay; and silica sand. Minerals Safeguarding Areas would be defined based on the geological resource as identified by the British Geological Survey.”

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.
CR57	Considers that this option provides a useful starting point, though areas of search could be added.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR58	Considers that this would provide a more rigorous and evidenced approach to defining Mineral Safeguarding 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.

Unique ID Reference	Summary of Issue	Response
WR23	<p>In addition to safeguarding the land suitable for such uses, option 2 acknowledges that there is a broad suite of minerals infrastructure types that should be safeguarded. This approach should also reflect the ‘agent of change’ principle. The reference in option 2 to the need to protect the viability of existing minerals development is supported. This builds on Surrey Minerals Plan 2011 Policy MC6 which seeks to prevent the effective operation of sites currently in or permitted for minerals development use from being prejudiced. In the Surrey Minerals Plan 2011, the mineral safeguarding areas are coterminous with the mineral consultation areas and the latter extend beyond the site boundaries of safeguarded facilities. Guidance on Surrey County Council’s approach to safeguarding is provided in their Standing Advice Note and Consultation Protocol 2016. It is noted the Protocol is being reviewed and we may have comments on any proposed changes to it.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR40	<p>Support option 2 to safeguard the county’s remaining reserved of potential exploitable mineral resources as these are finite resources and should be safeguarded for the future.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 3 – Safeguarding Mineral Resources Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR50	<p>Did not select either option for safeguarding mineral resources, as considers that neither option fully complies with the National Planning Policy Framework 2021. Option 1 current Mineral Safeguarding Areas do not include all resources. Option 2 may comply if it is adjusted to not exclude the protection of resources in the Areas of Outstanding Natural Beauty, which is contrary to National Planning Policy Framework 2021 and guidance.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
CR57	Note that fuller's earth would no longer be of commercial significance in Surrey with the end of extraction at the plant in Redhill. Clarification is 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.
WR16	In respect of safeguarding mineral resources, neither of the two proposed options are appropriate or consistent with the National Planning Policy Framework 2021 or National Planning Practice Guidance. Current Mineral Safeguarding Areas, as defined on the interactive map, do not provide safeguarding of remaining resources of minerals of local and National importance (National Planning Policy Framework 2021 paragraph 210c) and so option 1 is not appropriate. Option 2 proposes defining Mineral Safeguarding Areas on resources defined by the British Geological Survey but then proposes that areas within the Areas of Outstanding Natural Beauty are not included. Planning Practice Guidance makes it clear that safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so (Paragraph: 004 Reference ID: 27-004-20140306). There are known resources, particularly of soft sand, within the Areas of Outstanding Natural Beauty that should be included within the Mineral Safeguarding Area. While the risk of sterilising development occurring in the Areas of Outstanding Natural Beauty is lower as applications and proposals for development will be fewer, so too would be the potential implications for workload and scrutiny of such applications. In the absence of Mineral Safeguarding Area coverage, should potentially sterilising applications come forward there is no mechanism to alert the local planning authority and applicant to the presence of resources and to trigger the safeguarding process. Option 2, but without the exclusion of the Areas of Outstanding Natural Beauty, therefore, would be the appropriate option to pursue.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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
WR22	<p>Considers that minerals resources should be safeguarded in a manner which is consistent with the National Planning Policy Framework 2021 and associated guidance, and that it is not clear that either of the options presented are consistent with these.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR23	<p>Regarding safeguarding minerals reserves does not select an option but states that the National Planning Policy Framework 2021 makes clear that known resources of local and National importance should be safeguarded from non-mineral development that would sterilise those resources, whilst not creating a presumption that the resources defined will be worked (paragraph 201 (c)). The Issues and Options Spatial Strategy, acknowledges that much soft sand within the county lies within or close to the Surrey Hills Areas of Outstanding Natural Beauty. Whilst these designations have their own rigorous specific policy development criteria which must be met, the British Geological Survey Mineral Safeguarding in England: good practice advice says that safeguarding should not be precluded by the presence of National and international environmental designations on the basis that sterilising development does not take place in these areas. British Geological Survey data provides the starting point for identifying Mineral Safeguarding Areas and based simply on this, the presence of known soft sand resources both outside and within the Areas of Outstanding Natural Beauty should be safeguarded. It is believed that at the time of the Surrey Minerals Plan 2011, soft sand resources in the Areas of Outstanding Natural Beauty were not safeguarded in part because it was possible to make the necessary provision for soft sand from sites outside the Areas of Outstanding Natural Beauty. The continuation of a similar approach in the emerging Minerals and Waste Local Plan would need to be justified.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR33	Neither option should not be taken as they do not comply with the National Planning Policy Framework 2021. They also do not recognise the National importance of the industrial mineral found here (albeit this has been highlighted in the text regarding silica sand). Arbitrary boxes appear to have been drawn on the interactive map. These should be extended to match the outcrop of the lower greensand as detailed in published British Geological Survey data.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR33	The current Mineral Safeguarding Areas do not appear to cover the full extent of the relevant mineral resources of local and National importance as suggested by the British Geological Survey. Therefore, the current approach as outlined in option 1 is not suitable as this does not comply with the National Planning Policy Framework 2021 or Planning Practice Guidance. Option 2 proposes defining Mineral Safeguarding Areas on the basis of British Geological Survey data, but then suggests that areas within the Surrey Hills Area of Outstanding Natural Beauty will be removed. This is contrary Planning Practice Guidance (Paragraph: 004 Reference ID: 27-004-20140306) which indicates "safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so." The fact that silica sand is Nationally important is a clear reason for safeguarding the mineral in designated areas. Minerals can only be worked where they are found and can be worked sustainably in the Surrey Hills Area of Outstanding Natural Beauty. Option 2 would be appropriate without the exclusion of land within the identified Area of Outstanding Natural Beauty. Given the occurrence of Nationally important silica sand resource it would be appropriate to define Mineral Safeguarding Areas together with Mineral Consultation Areas to further protect valuable resources from unnecessary sterilisation directly and indirectly through adjacent 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.
WR44	Neither option is appropriate or consistent with the National Planning Policy Framework 2021 or Planning Practice 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
WR44	<p>The current Mineral Safeguarding Areas, as defined on the interactive map, do not provide safeguarding of remaining resources, but known locations of minerals of local and National importance (National Planning Policy Framework 2021 paragraph 210c) and so option 1 is not appropriate. Option 2 proposes defining Mineral Safeguarding Areas on resources defined by the British Geological Survey but then proposes that areas within the Area of Outstanding Natural Beauty are not included. Planning Practice Guidance makes it clear that safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so (Paragraph: 004 Reference ID: 27-004-20140306). There are known resources of soft sand within the Area of Outstanding Natural Beauty that should be included within the Mineral Safeguarding Area. While the risk of sterilising development occurring in the Area of Outstanding Natural Beauty is lower, as applications and proposals for development will be fewer, so too would be the potential implications for workload and scrutiny of such applications. In the absence of Mineral Safeguarding Area coverage, should potentially sterilising applications come forward there is no mechanism to alert the local planning authority and applicant to the presence of resources and to trigger the safeguarding process. Option 2, but without the exclusion of the Area of Outstanding Natural Beauty, therefore, would be the appropriate option to pursue.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 4 - Safeguarding Minerals Development Option One “An approach broadly consistent with Policy MC6 of the Surrey Minerals Plan 2011.”

Unique ID Reference	Summary of Issue	Response
WR5	<p>The council is of the view that the existing Policy MC6 of the Surrey Minerals Plan Core Strategy 2011 and Policy 7 of the Surrey Waste Local Plan 2020 provides a robust and, importantly, flexible approach to safeguarding, based on effective consultation. In this regard, Option 1 under safeguarding minerals development is supported: an approach broadly consistent with existing policies.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR52	<p>Preference would be to safeguard areas outside of sensitive landscapes i.e., the Surrey Hills Area of Outstanding Natural Beauty. However, it is noted that the Area of Search relating to the Surrey Hills boundary review is extensive, but that significant further work needs to be undertaken before a final boundary is put forward. This has the potential to present a risk from a mineral resource perspective in that this could mean that none of the identified soft sand resources within Tandridge would be safeguarded. Considers that overall option 1 in each instance (minerals and waste) is the better option, in that it would maximise on existing knowledge and would prevent uncertainty and disruption for communities. However, it is also raised that their needs to be clarity as to whether safeguarded areas will just simply be carried forward, or will the parameters be suitably reviewed to ensure they remain justified. Considers that any safeguarding policy should not just be about the identification of safeguarding areas. Both district councils with their development management role and developers need to have clarity about what level of detail mineral assessments need to go into to enable a proper evaluation of whether mineral resources underlying a development site should be pre-extracted, safeguarded in situ or can be sterilised. Other mineral planning authorities (e.g., Norfolk County Council) have published separate and detailed guidance on the process of carrying out safeguarding evaluations and this may be something that Surrey County Council would want to consider.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 5 - Safeguarding Minerals Development Option Two “An approach that provides for the safeguarding of existing minerals development, including but not limited to, processing facilities, aggregate recycling facilities, rail aggregate depots, brickworks and tileworks, and provides for the protection of land identified in the Minerals and Waste Local Plan as suitable these uses. The policy would also provide for the protection of the viability of existing minerals development.”

Unique ID Reference	Summary of Issue	Response
CR36, CR58, WR18, 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.
CR50	Considers that this should cover all minerals facilities and infrastructure.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
CR57	Considers it would provide certainty. However, considers that there should be a means to remove obsolete sites from protection later in the plan 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.
WR16	Proposed policy option 2 should be the approach taken. Mineral Consultation Areas around safeguarded facilities should be defined to provide a wider area (than the site boundary) to ensure that local planning authorities and applicants consult the Minerals and Waste Planning Authority about applications that may be sensitive to impacts of minerals operations and the safeguarding process is triggered, to ensure that new development does not compromise existing or future operations and/or incorporates mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR40	Support option 2 to safeguard the county's existing minerals development as it is far more sustainable to reuse existing development with established and appropriate road or rail infrastructure than to build new facilities. This is also necessary to ensure the protection of sites in the county with high biodiversity importance.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	This policy approach would be consistent with paragraph 210 of the National Planning Policy Framework 2021.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Table 6 – Safeguarding Minerals Development Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR50	Are consultation zones being designated around safeguarded sites and how will these be regulated?	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Reference to Woking Rail Aggregate Depot should be removed from 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.
WR1	Encourage the relocation of Woking Rail Aggregate Depot to a suitable 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.

Unique ID Reference	Summary of Issue	Response
WR5	Part of Woking Rail Aggregate Depot site has been allocated in the Site Allocations Development Plan Document as Policy UA33 to deliver about 100 homes between 2023 and 2026. It is hoped that the existing operations would be relocated for the full development potential of the site to be realised. Various key requirements have been incorporated into Policy UA33, drawing on feedback from the Minerals and Waste Planning Authority, to ensure a satisfactory relationship between the proposed residential development and the existing safeguarded depot, and avoid potential conflicts of use with its minerals function and operation whilst effort continues to find an alternative location for the residual operations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Existing rail aggregate depots are increasingly coming under pressure from developments in the vicinity which have the potential to prejudice or constrain their existing or indeed future operations.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Mineral Consultation Areas around safeguarded facilities should be defined to provide a wider area (than the site boundary) to ensure that local planning authorities and applicants consult the Minerals and Waste Planning Authority about applications that may be sensitive to impacts of minerals operations and the safeguarding process is triggered, to ensure that new development does not compromise existing or future operations and/or incorporates mitigation.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR21	Wish to see the Salfords site continue to be identified and safeguarded in the Minerals and Waste Local Plan on the same basis as the existing (i.e. as a Rail Aggregates Depot and as a site suitable for aggregates recycling). In terms of safeguarding this should ensure an appropriate consultation area is maintained around the site as is currently the case.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR21	<p>Wish to see the Woking Aggregates Rail Depot site continue to be identified and safeguarded in the Minerals and Waste Local Plan on the same basis as the existing. In terms of safeguarding this should ensure an appropriate consultation area is maintained around the site as is currently the case. Whilst potential relocation of the operation is not objected to in principle – it is considered that there is little prospect of finding an alternative site. Even if a site could be found it will take time to bring that forward and the safeguarding of the existing site must be maintained.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR21	<p>The appropriate option must ensure that safeguarding applies to existing, planned and potential sites for the bulk transport, handling and processing of minerals and processing and distribution of substitute, recycled and secondary aggregates in accordance with National Planning Policy Framework 2021 requirements. Critically it must also ensure that there are mineral consultation areas in place (as per the existing policy approach). There must be a requirement that local planning authorities consult the Minerals and Waste Planning Authority about proposals for non-mineral development in the consultation area around such sites.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR22	<p>It is not clear that either of the options presented are consistent with the National Planning Policy Framework 2021, which expects the following with respect to the safeguarding of minerals development: “Planning policies should: safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;”</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR33	<p>Mineral Consultation Areas should be defined in accordance with paragraph 210 of the National Planning Policy Framework 2021.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR42	Review the merits of progressing further site investigations on that part of the current Mineral Safeguarding Area to the west of Addlestone Quarry, potentially including borehole and/or trial pit sampling with analysis of the underlying strata in order to assess the quality any potential mineral, then submitting the results as part of an updated Minerals Resource Assessment to the Minerals and Waste Planning Authority.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 - Safeguarding Waste Management Development Option One “An approach broadly consistent with Policy 7 of Surrey Waste Local Plan 2019.”

Unique ID Reference	Summary of Issue	Response
CR43	Considers that existing policy 7 covers the two important aspects of waste site 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.
CR57	Considers that this option would seem a more responsible approach as there is a risk that introducing viability would undermine some sites before their natural obsolescence.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 given how recently the Surrey Waste Local Plan 2020 was found sound, option 1 is considered most appropriate. However, Runnymede Borough Council wishes to flag that the current Trumps Farm allocation is near to the Longcross Garden Village allocation which will contain a minimum of 1700 new homes and supporting uses. The borough council would wish to ensure that if the Trumps Farm site continues to be allocated for waste development that this does not conflict with the policy requirements set out in Policy SD9 of the Runnymede 2030 Local Plan which will guide the delivery of this new settlement.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	The council is of the view that the existing Policy MC6 of the Surrey Minerals Plan Core Strategy 2011 and Policy 7 of the Surrey Waste Local Plan 2020 provides a robust and, importantly, flexible approach to safeguarding, based on effective consultation. In this regard, option 1 under safeguarding waste management development is supported: an approach broadly consistent with existing policies.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR23	Regarding safeguarding waste sites selected option 1 as this takes an approach broadly consistent with Surrey Waste Local Plan 2020 Policy 7, which seeks to prevent the operation of safeguarded sites from being prejudiced, but with additional specific emphasis given to the need to protect viability.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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	Selected option 1 as option 2 would seem to rule out environmental constraints if, say, they are major intensification of use of the site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR45	Support a similar policy approach to that contained within Policy 7 of the Surrey Waste Local Plan 2020. Considers that safeguarding policy should be written so as to not preclude other development but require consultation, and that development in close proximity to safeguarded sites should not prejudice their operation. States that the emerging Plan should also set out the policy framework for sites where improvement and enhancement are proposed on safeguarded sites, in a similar manner as Policy 8 of the 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.

Unique ID Reference	Summary of Issue	Response
WR52	<p>Overall states that the preference would be to safeguard areas outside of sensitive landscapes i.e., the Surrey Hills Area of Outstanding Natural Beauty. However, it is noted that the Area of Search relating to the Surrey Hills boundary review is extensive, but that significant further work needs to be undertaken before a final boundary is put forward. This has the potential to present a risk from a mineral resource perspective in that this could mean that none of the identified soft sand resources within Tandridge would be safeguarded. Considers that overall option 1 in each instance (minerals and waste) is the better option, in that it would maximise on existing knowledge and would prevent uncertainty and disruption for communities. However, it is also raised that their needs to be clarity as to whether safeguarded areas will just simply be carried forward, or will the parameters be suitably reviewed to ensure they remain justified. Considers that any safeguarding policy should not just be about the identification of safeguarding areas. Both district councils with their development management role and developers need to have clarity about what level of detail mineral assessments need to go into to enable a proper evaluation of whether mineral resources underlying a development site should be pre-extracted, safeguarded in situ or can be sterilised. Other mineral planning authorities (e.g., Norfolk County Council) have published separate and detailed guidance on the process of carrying out safeguarding evaluations and this may be something that Surrey County Council would want to consider.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 8 - Safeguarding Waste Management Development Option Two “A two-policy approach - the first dealing with safeguarding of land that may be suitable for waste management development, existing waste management facilities, and land that benefits from consent for waste management development; and the second dealing with the protection of the viability of existing waste management facilities.”

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 this seems the more appropriate option to manage the issues.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR40	Support option two to safeguard the county’s existing waste management development as it is far more sustainable to reuse existing development with established and appropriate road or rail infrastructure than to build new facilities. This is also necessary to ensure the protection of sites in the county with high biodiversity importance.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as 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 – Safeguarding Waste Management Development Further/Other Comments

Unique ID Reference	Summary of Issue	Response
CR43	It is important that development proposals within 250m of a landfill site, whether that landfill be operational or closed, fully consider and mitigate against potential risks relating to landfill gas. Both the Environment Agency (as regulator) and the environmental permit holder should be consulted on any development within 250m of a permitted landfill site.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.

Unique ID Reference	Summary of Issue	Response
WR15	The National Planning Policy for Waste 2014 (paragraph 8) requires that the likely impact of non-waste development on waste management facilities is 'acceptable'. Implicitly, National policy therefore recognises that non-waste development can have some impact on waste management facilities and that the extent to which this impact is acceptable, rather than whether there is an impact at all, should be considered when determining planning 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.
WR15	It is important that the emerging plan does not impose any tighter constraints on non-waste development than are set out in National policy. Policy in the emerging plan should therefore focus on not prejudicing the efficient operation of waste management sites in accordance with relevant Environmental Permits whilst also allowing non-waste development on or nearby sites where the waste capacity and/or safeguarded site is not required; the need for the non-waste development overrides the need for safeguarding; equivalent, suitable and appropriate replacement capacity can be provided elsewhere in advance of the non-waste development; and the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable. This is essential to avoid sites being unnecessarily sterilised.	Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.
WR21	In terms of specific policy requirements, would welcome wording that is akin to that now found in the recently adopted Surrey Waste Local Plan (2020), Policy 7 - Safeguarding, Part B - which is very much in line with 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.
WR26	Does not consider it necessary to identify operational wastewater treatment works as "safeguarded" sites for alternative waste treatment facilities. Considers that the safeguarding of such sites is not necessary as there is no certainty that the sites would be available for alternative waste facility redevelopment. Therefore, prefer an option to safeguard only those waste management facilities in locations which are consistent with the vision and objectives 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.

Unique ID Reference	Summary of Issue	Response
WR53	<p>States their concern with safeguarding in the plan policy is that it should also support moving waste up the hierarchy and encourage a circular economy rather than just preserving land and capacity on a like for like basis (i.e., business as usual), where an existing site might be lost to alternative development or closure. States there will be changes in the waste sector and policies must be flexible enough to allow for the potential of this rather than locking them into having the same type of site in future. During site allocation, it is important to ensure sites are resilient in terms of both the strategic management of waste and also in terms of future proofing (i.e., regulatory change and climate adaptation). Over reliance upon one site for a specific function or activity, for example, may lead to issues of compromised resilience (i.e., if it were closed due to fire, flooding etc.). There may also be issues around proximity when relying heavily on just one site of a particular type in the county from a carbon footprint point of view, where it might increase transport distances and vehicle emissions (e.g., significant quantities of anaerobic digestion digestate and compost being transported out of the county). Sites also need to be resilient from a climate change point of view. Consideration should be given to future flood risk (at least over the plan period) and other considerations around amenity and nuisance (e.g., due to increases in temperature), in relation to sensitive receptors and other potential developments. Electrification of transport systems should also be a consideration.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Table 10 – Other/General Comments

Unique ID Reference	Summary of Issue	Response
WR15	<p>With regard to not prejudicing the efficient operation of facilities, this should be considered only in the context of how a facility is permitted to operate, in respect of the grant of planning permissions including any planning conditions imposed, Environmental Permits and other requirements. Whether or not a non-waste development will prejudice effective operations should be assessed within this context. For example, existing facilities in operation in proximity to existing residential areas, such as Patteson Court, have controls in place which the operators must adhere to ensure impacts on the surrounding area are acceptable. Therefore, new development should not be seen to prejudice the continuing efficient operation of the facility. It is acknowledged that new development may introduce new receptors to an area; however, this does not mean that the efficient operation of the facility will be prejudiced as the agreed requirements for operation, including liaising with surrounding residents, will continue to apply.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>
WR17	<p>Surrey County Council should ensure that any safeguarded land that has become exhausted is restored at the earliest opportunity, in line with part h) of paragraph 210 within the National Planning Policy Framework 2021. This would help to create opportunities for new habitats and to increase biodiversity on exhausted sites. For example, Clockhouse Brickworks has lain dormant for some time, and should it be decided that this site, or even part of the site, is no longer required, then the site or part of the site should be restored as soon as possible.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>

Unique ID Reference	Summary of Issue	Response
WR18	<p>For the key requirements of the National Planning Policy Framework 2021 in terms of safeguarding and 'agent of change' to be met it is imperative that policies in the Local Plan are robust and explicit in terms of the physical boundaries of the safeguarded area and requirements on new development coming forward. This is particularly with regard to how proposals for the introduction of noise sensitive uses in proximity to these types of safeguarded sites will be considered.</p>	<p>Comment(s) noted. Any issue(s) raised will be considered further and addressed as appropriate by the Minerals and Waste Planning Authority in preparing the Regulation 19 Draft Minerals and Waste Local Plan to be published in 2023.</p>