



**Surrey Heath Borough
Council**

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15th February 2022

Dear Sir/Madam,

**Surrey Heath Borough Council's response to the Surrey Minerals & Waste Local Plan
Regulation 18 Consultation**

Thank you for the opportunity to comment on the Surrey Minerals & Waste Local Plan Regulation 18 consultation.

Please accept this letter as Surrey Heath Borough Council's formal response to the consultation, agreed by Executive on 15th February 2022. Our response follows the format of the Regulation 18 consultation documents. Each question has been considered and only those where the Council wishes to provide specific commentary are included in the response.

Where the response does not provide commentary in relation to a consultation question, please assume that the Council does not wish to provide detailed comment to the question at this stage. Please note that our response does not provide commentary on the non-technical questions.

Surrey Heath Borough Council wishes to be notified of the outcome of the consultation and to be kept informed about future consultations relevant to the development of the Surrey Minerals and Waste Local Plan.

Having considered the Regulation 18 draft plan, the Council has the following comments to make:

1. Proposed Vision and Strategic Objectives

Q1.

Do you support or otherwise agree with the vision proposed for the MWLP?

If not, what would you like to see included or excluded?

- 1.1. Surrey Heath Borough Council is supportive of the vision proposed for the Surrey Minerals and Waste Local Plan.
- 1.2. The proposed vision for Surrey County broadly aligns with the Council's corporate priorities for Surrey Heath borough, as set out in the Council's Five-Year Strategy¹. The Council is supportive of the proposed vision's commitment to the sustainable development of minerals and waste management facilities to support our borough's residents and businesses, whilst seeking to ensure that any development mitigates potential environmental impacts, promotes biodiversity net gain, and is resilient to climate change.

Q2.

Do you support or otherwise agree with the strategic objectives proposed for the MWLP?

If not, what would you like to see included or excluded?

- 1.3. Surrey Heath Borough Council is supportive of the 13 proposed strategic objectives for the Surrey Minerals and Waste Local Plan.
- 1.4. We are committed to working with our partners to undertake local action to tackle climate change, preserving and enhancing the natural environment, whilst balancing our commitments to housing delivery and economic growth. Insofar as these commitments must be balanced, the inclusion of all 13 strategic objectives is recommended for the MWLP, in order to provide an holistic approach to minerals and waste development in Surrey.
- 1.5. However, the Council notes that there is scope for further ambition and detail to be added to the strategic objectives throughout the development of the plan as progress is made toward adoption. Particular consideration should be given to the introduction of text to reaffirm Surrey County's commitments to carbon-neutrality, as set out in County Council's Climate Change Strategy 2020, within the context of the MWLP.

¹ Available online at: <https://surreyheath.gov.uk/council/about-council/five-year-strategy>.

2. Spatial Strategy

Spatial Strategy Options for Minerals Development

1. **Option One:** Provide for future minerals needs for key mineral resources (i.e. primary aggregate, silica sand and brick clay) solely through the development of extensions to the quarries / minerals sites already present in the County.
2. **Option Two:** Provide for future minerals needs through the identification and allocation of small numbers of new quarries / minerals sites in locations with good accessibility and away from sensitive landscapes, habitats, and communities. Any new strategic sites will be identified in the MWLP.
3. **Option Three:** Combine elements of options one and two to ensure that the County is able to comply with national requirements for landbanks in respect of primary aggregate, silica sand and brick clay.

Q1.

Which one of the three options do you think should be the approach taken for the MWLP?

Why?

- 2.1. The MWLP does not at this stage express an identified need for minerals development over the proposed plan period. Therefore, it is not possible to determine whether the implementation of either Option 1 or Option 2 in isolation would provide for sufficient minerals development throughout the plan period.
- 2.2. Given the MWLP's strategic objectives, Option 1 could reasonably be considered preferable, where existing minerals facilities can be appropriately expanded or intensified. However, given the spatial distribution of existing minerals sites, in combination with the geological conditions of the borough, it remains to be determined whether the implementation of Option 1 alone would be sufficient.
- 2.3. Consideration should therefore be given to the introduction of a strategic policy that sets out a spatial hierarchy of preference for the direction of minerals development. Such a policy could seek to maximise the implementation of one option as far as reasonably practicable, before then relying on another approach, to provide sufficient minerals development to meet any identified need or requirement. This could be introduced alongside any specific site allocations.

Q2.

Are there any other issues or policy options that you would suggest for consideration?

Please provide detail.

2.4. No further comment.

Waste Management Development

1. **Option One:** Maximise the capacity of existing waste management facilities in the County (including expansion where practicable and appropriate) to meet the need of any necessary additional capacity.
2. **Option Two:** Seek to provide any necessary additional capacity in a small number of new strategic facilities accommodating a range of waste management approaches within or close to the main centres of population where high levels of growth are anticipated and there is good access to the strategic/primary road network. Any new strategic sites will be identified in the MWLP.
3. **Option Three:** Seek to provide any necessary additional capacity in a large number of new non-strategic facilities dispersed across the County with particular focus on areas likely to experience the most rapid pace of growth and development over the MWLP period. Non-strategic sites would not be identified in the MWLP.
4. **Option Four:** Combine elements of options one, two and three and use strategic allocations to address only the most significant capacity gaps expected to arise over the lifetime of the MWLP.

Q3.

Which one of the four options do you think should be the approach taken for the MWLP?

Whv?

- 2.5. The Council notes that the Waste Capacity Needs Assessment (WCNA) (2019) forecasts a capacity gap in Surrey to 2035. However, the MWLP does not identify, at this stage, whether the implementation of a single identified strategy would provide for sufficient waste-management development throughout the plan period.
- 2.6. Therefore, it is not possible to determine whether the implementation of Option 1, Option 2 or Option 3 in isolation would provide for sufficient minerals development throughout the plan period. Given the MWLP's strategic objectives, Option 1 could reasonably be considered preferable, where existing minerals facilities can be appropriately expanded or intensified, though it remains to be determined whether the implementation of Option 1 alone would be sufficient.

- 2.7. Consideration should therefore be given to the introduction of a strategic policy that sets out a spatial hierarchy of preference for the direction of waste-management development. Such a policy could seek to maximise the implementation of one option as far as reasonably practicable, before then relying on another approach, to provide sufficient minerals development to meet any identified need or requirement. The options do not appear to be mutually exclusive. This This could be introduced alongside any specific site allocations.

3. Protecting the Green Belt, Environment and Communities

Green Belt

1. **Option One:** Maintain the established policy approach. With one policy that provides guidance to all forms of waste management development, and a second that addresses the question of minerals extraction and other forms of minerals development in the Green Belt.
2. **Option Two:** Update the existing policy approach to reflect guidance on 'inappropriateness'. Include one policy providing guidance for 'inappropriate development' including waste management development and non-extractive minerals related development, and a second policy covering mineral extraction including surface mineral workings and hydrocarbon development (exploration, appraisal, and extraction).

Q1.

Which one of two options do you think should be the approach taken for the MWLP?

Whv?

- 3.1. Of the available options, Option 2 represents the Council's preferred approach. Option 2 would provide for the guidance to be updated to reflect the guidance on 'inappropriateness', and allow for an appropriate level of guidance to specifically address mineral extraction including surface mineral workings and hydrocarbon development (exploration, appraisal, and extraction).

Q2.

Are there any other policy approaches that should be considered with reference to the management of impacts on the Green Belt?

- 3.2. No comment.

Restoration

1. **Option One:** All site restoration or enhancement schemes deliver at least 10% biodiversity net gain (on-site or through off-setting contributions as appropriate). Such an approach is likely to deliver some improvement at the site level over the situation that pertained prior to mineral working / other development but would be unlikely to support broader biodiversity benefits for the host area.
2. **Option Two:** All quarry restoration schemes deliver at least 20% biodiversity net gain; and all other site restoration or enhancement schemes deliver at least 10% biodiversity net gain (on-site or through off-setting contributions as appropriate). Such an approach is likely to deliver definite improvement at the site level for quarries over the situation that pertained prior to mineral working but would have a limited ability to support broader biodiversity benefits for the host area. For non-quarry development the approach would deliver some improvement at the site level over the situation that pertained prior to mineral working / other development but would be unlikely to support broader biodiversity benefits for the host area.
3. **Option Three:** All quarry restoration schemes deliver 20% biodiversity net gain over the site baseline and a further net gain of at least 10% to create additional headroom within the host area; and all other site restoration or enhancement schemes deliver at least 10% biodiversity net gain (on-site or through off-setting contributions as appropriate). Such an approach is likely to deliver definite improvement at the site level over the situation that pertained prior to mineral working and would support broader biodiversity benefits for the host area (particularly if the minimum 10% uplift were substantially exceeded).

Q3.

Which one of the four options do you think should be the approach taken for the MWLP?

Why?

- 3.3. In March 2019, the government confirmed that biodiversity net gains are set to be required for all development proposals. Additionally, the NPPF (2021) makes it clear that planning policies should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity. The NPPF also states that planning policies should identify and pursue opportunities for securing *measurable* net gains for biodiversity.

- 3.4. Notably, the Surrey Nature Partnership recommends that Surrey's local planning authorities adopt a policy for a minimum 20% increase in biodiversity units for all planning applications. The Council agrees with the conclusions of the Surrey Nature Partnership and contends that a minimum of 20% increase in biodiversity should be the target for all planning applications. Therefore the council does not support any of the proposed options as currently formulated.
- 3.5. The Council notes that development provides opportunities to encourage biodiversity through appropriate design, including site restoration and/or enhancement schemes. The Council is supportive of an approach that requires a minimum of 20% in biodiversity as the target for all planning applications, including for all site restoration and/or enhancement schemes.
- 3.6. Given the scale of biodiversity loss in Surrey, the Council is supportive of an ambitious approach to biodiversity net gain. Therefore, the Council supports the implementation of Option 3 but note that the objective should be amended to ensure that *"all other site restoration or enhancement schemes deliver at least **20%** biodiversity net gain (on-site or through off-setting contributions as appropriate)."*
- 3.7. Additionally, it should be made clear within any detailed policy that biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts of new development and should be delivered even if there are no losses through development. Biodiversity net gain should not be applied to irreplaceable habitats and should be dealt with separately to any mitigation and/or compensation requirements for European sites

Site Restoration and Enhancement

1. **Option One:** Retain the SMP approach to the form, content, and structure of the restoration policies for quarry sites. Retain the approach currently set out in the SWLP with respect to restoration and enhancement of waste management facilities. There would be no clear policy approach with respect to minerals development that does not involve quarrying operations.
2. **Option Two:** Adopt a policy approach based on the type of land-use. The first policy would focus on quarry restoration with sub-clauses that set out the MWPA requirements with respect to the restoration of quarry sites and associated temporary infrastructure. The second policy would deal with the restoration / enhancement of minerals or waste management development not subject to quarrying operations, with a structure like that proposed for quarrying operations.

3. **Option Three:** Adopt a policy approach based on landform and biodiversity net gain. The first policy would focus on the question of the landform to be achieved by the restoration of land affected by quarrying operations. The second policy would focus on the delivery of biodiversity net gain across all the forms of development covered by the MWLP.

Q7.

Which one of three options above do you think should be the approach taken for the MWLP?

Why?

- 3.8. Of the available options, Option 2 represents the Council's preferred approach. However, this depends on the approach that the MWLP takes with regard to the other policy areas in relation to Biodiversity Net Gain. The inclusion of a broad policy on biodiversity net gain across all forms of development covered by the MWLP would be useful, though this is likely to be covered in detail elsewhere.

Climate

1. **Option One:** Maintain the established policy approach. For minerals development, no policies would specifically address greenhouse gas emissions relying instead on National policy guidance and policies in the district and borough local development plans. For waste management development, the approach set out in the SWLP, in terms of measures to support sustainable construction and transport, would be retained.
2. **Option Two:** Broad environmental protection policy approach. Include specific greenhouse gas reduction clauses in a single broad environmental protection policy that covers all forms of minerals and waste management development.
3. **Option Three:** Climate change mitigation policy approach. Introduce a policy that covers (1) the management of greenhouse gas emissions from all types of minerals and waste management development e.g. through integration of renewable energy technology into development design, energy efficiency measures, incorporation of electric vehicle charging points and use of electric or hydrogen powered vehicles; (2) the potential for minerals and waste management development to contribute to carbon management e.g. carbon sequestration in planting and underground carbon capture and storage in suitable geological structures; and (3) the potential for certain types of minerals or waste management development (e.g. natural gas well sites, AD facilities, and landfill sites) to produce hydrogen from natural gas or biogas, subject to such developments being equipped with carbon capture technology.
4. **Option Four:** Development-specific climate change policies approach. Introduce several policies that address the impacts of minerals and waste management development on the causes of climate change and the steps that such developments can take to reduce or eliminate such emissions. One policy would focus on surface mineral working and associated development (e.g. aggregate recycling, and rail aggregate depots), a second policy would focus on hydrocarbon development, a third policy would focus on waste management development, and a fourth policy would address the potential of the minerals and waste management industries to contribute to carbon management (e.g. carbon capture and storage facilities, carbon sequestration, hydrogen production, and energy efficiency measures).

Q9.

Which one of four options above do you think should be the approach taken for the MWLP?

Whv?

- 3.9. Surrey Heath Borough Council is committed to tackling Climate Change, working with our local communities and partners, including Surrey County Council. Local Planning Authorities have an important role in shaping new and existing development in ways that reduce carbon emissions and positively build community resilience to the impacts of climate change. In March 2019, Surrey County Council declared a climate emergency, highlighting the need for proactive action to help tackle both the causes and effects of climate change.
- 3.10. Therefore, the Council is supportive of an approach that delivers detailed policy guidance to address the impacts of minerals and waste management development on the causes of climate change and the steps that such developments can take to reduce or eliminate relevant emissions. As such, Option 1 does not represent a preferred approach.
- 3.11. Of the remaining available options, Options 3 and 4 represent the more ambitious approaches. In the Council's view, Option 3 represents a deliverable, flexible, and concise approach to address the impacts of minerals and waste management development on the causes of climate change. Importantly, any detailed policy should include sufficient flexibility to remain relevant in the fast-changing technological landscape in relation to climate change mitigation. As such, policies that focus on outcomes rather than processes in this area may be more appropriate.

Air Quality

1. **Option One:** Maintain the established policy approach. For minerals development no policies would specifically address the question of impacts on local air quality. The MWLP will instead rely upon National policy guidance and policies in the district and borough local development plans. For waste management development the policy approach set out in the SWLP would be retained.
2. **Option Two:** Broad environmental protection policy approach. Include specific air quality impact management clauses in a single broad environmental protection policy that covers all forms of minerals and waste management development.
3. **Option Three:** Single air quality mitigation policy approach. Introduce a single policy that addresses the impacts of minerals and waste management development on air quality.
4. **Option Four:** Development-specific air quality policies approach. Introduce several policies that address the impacts of minerals and waste management development on air quality, with one policy focusing on surface mineral working and associated development (e.g. aggregate recycling and rail aggregate depots), a second policy focusing on hydrocarbon development, a third focusing on waste management development, and a fourth focussing on traffic related emissions from minerals and waste management development.

Q11.

Which one of the four options above do you think should be the approach taken for the MWLP?

Whv?

- 3.12. Of the available options, Option 3 represents the Council's preferred approach. Option 3 represents the appropriate level guidance, which is deliverable, flexible, and concise, to address the impacts of minerals and waste management development on air quality.
- 3.13. Potential Air Quality impacts from development represents a technical and variegated area, which would benefit from detailed guidance in an holistic air quality mitigation policy. The implementation of Options 1 and 2 would appear to provide insufficient guidance on this technical area.
- 3.14. Given the variegated context that the different types of development face in relation to potential air quality impacts, policies that focus on outcomes rather than processes in this area may be more appropriate. Therefore, Option 4 would appear to be less deliverable and an inefficient way to present the requirements concerning potential air quality impacts.

Water

1. **Option One:** Maintain the established policy approach. For the minerals development maintain the established SMP approach of a clause on water quality, water resources and flood risk within a broad environmental protection policy; and maintain the policy approach for the waste management development as set out in the SWLP.
2. **Option Two:** Single water environment protection policy approach. Introduce a single policy that addresses the impacts of minerals and waste management development on water quality, on water resources and on flood risk.
3. **Option Three:** Separate water quality and resources policy and flood risk management policy approach. Introduce two policies both covering the impacts of minerals and waste management development on the water environment, the first focussing on water quality and water resources, and the second on the management of flood risk.

Q13.

Which one of three options above do you think should be the approach taken for the MWLP?

Whv?

- 3.15. Of the available options, either Option 2 or Option 3 would represent the Council's preferred approach. Options 2 and Option 3 would each represent an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the impacts of minerals and waste management development on water quality, water resources, and flood risk management.
- 3.16. Potential impacts on water quality and water resources from development represents a technical and variegated area, which would benefit from detailed guidance in an holistic water quality and water resources mitigation and management policy. Consideration of Flood Risk Management may benefit from discussion in an holistic single policy, as the policy requirements and discussion are likely to relate or overlap somewhat.
- 3.17. However, consideration should be given to setting out requirements relating to flood risk management in a distinct policy should the topic area warrant particular attention in the drafting of the policy. Given the variegated context that the different types of development face in relation to potential water quality, water resource, and flood risk management impacts, policies that focus on outcomes rather than processes in this area may be more appropriate.
- 3.18. Where appropriate, the Council would defer to the advice of the Environment Agency in this regard.

Land and Soils

1. **Option One:** Maintain the established policy approach. Maintain the established policy approach of having a clause that deals with impacts of minerals and waste management development on land and soil resources set within a broad environmental protection policy.
2. **Option Two:** Single land and soils protection policy approach. Introduce a single policy that addresses the impacts of minerals and waste management development on land and soil resources, including risks of contamination and instability.
3. **Option Three:** Development-specific land and soil protection policies approach. Introduce two policies, one covering the impacts of minerals development on land and soil resources, and the second covering the impacts of waste management development on land and soil resources. In both cases include risks of contamination and instability as relevant to the type of development addressed.

Q15.

Which one of three options above do you think should be the approach taken for the MWLP?

Why?

- 3.19. Of the available options, Option 2 represents the Council's preferred approach. Option 2 represents an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the impacts of minerals and waste management development on land and soil resources, including risks of contamination and instability.
- 3.20. Where appropriate, the Council would defer to the advice of the Environment Agency in this regard.

Nature

1. **Option One:** Maintain the established policy approach. With reference made to issues relevant to the protection of the natural environment in several policies covering minerals and waste management development.
2. **Option Two:** Single nature and biodiversity policy approach. Include a single dedicated policy that focuses on the protection of habitats and species, including designated sites and geological conservation interests, and wider ecological networks from the potential adverse impacts of minerals and waste management development, and on the delivery of biodiversity net gain through the restoration of minerals workings, or the design and construction of waste management facilities.
3. **Option Three:** Separate nature protection and biodiversity net gain policies approach. Include two natural environment focussed policies, one covering the protection of habitats and species, including designated sites and geological conservation interests, and wider ecological networks from the potential adverse impacts of minerals and waste management development, and one that focusses on the delivery of biodiversity net gain through the restoration of mineral workings or through the design and construction of waste management facilities.
4. **Option Four:** Single strategic nature protection policy approach. Include a single strategic policy in the MWLP that covers nationally important nature conservation and geological conservation assets, but for detail rely on the biodiversity and geodiversity protection and biodiversity net gain policies set out in district or borough local development plans.

Q17.

Which one of four options above do you think should be the approach taken for the MWLP?

Whv?

- 3.21. Of the available options, Option 3 represents the Council's preferred approach. Option 3 represents the appropriate level of guidance, which would be deliverable, flexible, and concise, to address the potential impacts of minerals and waste management development on both protected habitats and species, and the delivery of biodiversity net gain.

- 3.22. Biodiversity Net Gain management and the protection and enhancement of protected habitats and species are sufficiently detailed topic areas to warrant guidance to be provided in two distinct policies. Given the detailed policies that many district or borough local development plans have set out, any policy taken forward should take account of the ambition and intent of these policies to ensure that the requirements are consistently ambitious across the County.
- 3.23. In the research and development of this policy, consideration should be given to the extent of coverage across the County of adopted local development plans that include policies on biodiversity net gain. If it is determined that there is sufficient coverage amongst the district and borough's adopted local development plans, Option 4 may be considered appropriate. Any conclusions made in this assessment should be set out in the discussion accompanying this proposed policy in the next iteration of the MWLP.

Landscape and Townscape

1. **Option One:** Maintain the established policy approach. With reference made to issues relevant to the protection of landscapes and townscapes in several policies covering minerals and waste management development.
2. **Option Two:** Single landscape and townscape policy approach. Include a single dedicated policy that focuses on the protection of landscapes and townscapes from the potential adverse impacts of minerals and waste management development, and on the delivery of enhancement through the restoration of minerals workings or through the design and implementation of waste management facilities.
3. **Option Three:** Single strategic landscape and townscape policy approach. Include a single strategic policy in the MWLP that covers nationally important landscape or townscape assets, but for detail rely on relevant policies set out in the district or borough local development plan.

Q19.

Which one of three options above do you think should be the approach taken for the MWLP?

Why?

- 3.24. Of the available options, Option 3 represents the Council's preferred approach. Option 3 represents an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the potential impacts of minerals and waste management development on both landscape and townscape, given the likeliness that Surrey's borough and district Councils will benefit from adopted detailed policy guidance.

Heritage

1. **Option One:** Maintain the established policy approach. With reference made to issues relevant to the protection of heritage assets in several policies covering the minerals and waste management development.
2. **Option Two:** Single historic environment policy approach. Include a single dedicated policy that focuses on protecting the historic environment from the potential harm from minerals and waste management development.
3. **Option Three:** Separate policies approach. Include one policy covering the protection of the historic environment from harm from minerals development, and a second policy covering the same for waste management development.
4. **Option Four:** Single strategic landscape and townscape policy approach. Include a single strategic policy in the MWLP that covers nationally important heritage assets, but for detail rely on relevant policies set out in the district or borough local development plan.

Q21.

Which one of four options above do you think should be the approach taken for the MWLP?

Why?

- 3.25. Of the available options, Option 3 represents the Council's preferred approach. Option 3 represents an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the potential impacts of minerals and waste management development on heritage, given the likelihood that Surrey's borough and district Councils will benefit from adopted detailed policy guidance.

Movement and Access

1. **Option One:** Maintain the established policy approach. With one policy addressing the impacts of minerals development on transport networks and requiring that alternatives to road-based transport be considered, a second policy safeguarding rail aggregate depots, and a third policy covering the impacts of waste management development on transport networks and requiring that alternatives to road-based transport be considered.
2. **Option Two:** Two policy approach. Adopt one policy covering the impacts of minerals and waste management development on transport networks, and a second policy safeguarding rail aggregate depots and promoting rail as an alternative to road-based transport.
3. **Option Three:** Three policy approach. Adopt one policy covering the impacts of minerals and waste management development on transport networks, a second policy safeguarding rail aggregate depots and encouraging the use of rail for the transport of waste, and a third policy covering river-borne transport and the provision of wharves.

Q23.

Which one of three options above do you think should be the approach taken for the MWLP?

Whv?

- 3.26. In the Council's view, Option 3 represents the preferred approach. Option 3 represents the most deliverable and efficient approach to address the impacts of minerals and waste management development on the transport network.
- 3.27. Given the variegated context that the different types of development face in relation to potential impacts on the transport network, policies that focus on outcomes rather than processes in this area may be more appropriate. In drafting the detailed policies, the County Council should consider the benefits of including requirements that alternatives to road-based transportation are demonstrably explored before any decision is made to rely on road-based transportation.

Communities

1. **Option One:** Maintain the established policy approach. With a single broad policy for minerals development covering a range of environmental matters including issues of noise, dust, light, impacts on open space and the public rights of way, and public protection (particularly bird strike), with supporting references made to relevant matters in a minerals site restoration policy. For waste management development maintain the established policy approach, with harmful impacts on communities covered in a broad environmental and community protection policy, and provision of green infrastructure addressed in the sustainable design policy.
2. **Option Two:** Multiple policy approach. Adopt a single policy that focuses on the protection of communities from the nuisance impacts of minerals and waste management development, covering both strategic and detailed matters (including bird strike risks), and enhance the guidance given on the creation publicly accessible greenspace in the restoration policy and the sustainable design policy.
3. **Option Three:** Single strategic policy approach. Adopt a single strategic policy in the MWLP covering community wellbeing and accessible greenspace, but for detail rely on the relevant policies set out in the district or borough local development plan.

Q25.

Which one of three options above do you think should be the approach taken for the MWLP?

Whv?

- 3.28. Of the available options, Option 2 represents the Council's preferred approach. The implementation of Option 2 would represent an appropriate level of guidance, which would be deliverable, flexible, and concise, to address the impacts of minerals and waste management development on our local communities.
- 3.29. The protection of communities from the nuisance impacts of minerals and waste management development, and the creation and enhancement of publicly accessible greenspace, are topics of sufficient detail and size to warrant consideration in distinct policies.

- 3.30. However, consideration should be given to the extent to which the creation and enhancement of publicly accessible greenspace is covered in both the site restoration policy and the sustainable design policy. If there is insufficient additional value to be provided in developing a distinct policy on the matter, the MWLP may benefit from either a distinct policy that draws in the requirements previously set out in the alternative policies, or covering the remaining policy requirements in this area within the broader detailed communities policy. This would essentially comprise Option 2, but within a single detailed policy.

4. Aggregate, Minerals and Infrastructure

- 4.1. The Council does not wish to submit specific commentary on this part of the consultation.

5. Waste Management

Identifying land for waste management development

1. **Option One:** An approach which allocates land for specific waste management uses; and a range of potential management waste uses the acceptability of which is to be determined at the planning application stage based on criteria-based policy and need.
2. **Option Two:** An approach which identifies areas of search, with specific waste management uses to be determined at the planning application stage based on criteria-based policy and need.
3. **Option Three:** A combined approach which includes a combination of Option One and Option Two above.
4. **Option Four:** Adopt a criteria-based policy approach only with no allocations or areas of search.

Q18.

Which option do you think is the best approach for the MWLP to provide enough land to meet any identified need for waste management capacity?

- 5.1. Option 3 represents the Council's preferred approach to the identification of potential land for waste-management development. As previously noted, it remains to be determined whether the implementation of Option 1 in isolation would provide for sufficient potential development land to meet the identified need within the plan period. Within this context, Option 1 should be implemented as far as reasonably practicable prior to consideration of Option 2.
- 5.2. The allocation of identified sites for specific waste-management uses provides the most robust approach of the four available options. In identifying specific sites for the development of waste management facilities, Surrey County Council is provided the opportunity to assess the *suitability*, *viability* and *achievability* of sites in relation to the definitions provided in Planning Practice Guidance. In undertaking individual site assessments up-front at the plan-making stage, the MWLP could provide a more robust set of site allocations that are more likely to be delivered within the plan period to meet the identified capacity gap.
- 5.3. Should the implementation of Option 1 not identify sufficient sites for waste-management development, the MWLP should seek to implement Option 2 as a second step to ensure that further waste-management development can be guided by the criteria-based policy. Essentially, this would comprise the implementation of Option 3.