

## CONSULTATION ISSUE 1 : MINERALS AND SUSTAINABLE DEVELOPMENT

The Consultation paper recognises both the need for minerals and the disturbance that mineral operations cause to the physical environment and local communities. The Paper identifies the broad aim of the SMRLP to be "to provide the minerals that our society and economy need with least impact on the environment and natural resources". 'Restoration-led' mineral working is seen to offer potential long term social and environmental benefits, and that the SMRLP must seek a way of striking a 'balance' between the environmental/natural resource and economic objectives.

- 1a *Do you agree that the basic objective of the Plan is to provide for the supply of minerals needed by the economy and society with the least harm to the environment and residential amenity?*

Comment

As a general proposition this would seem acceptable, bearing in mind few, if any, mineral deposits cannot be won without a degree of harm. However, such 'basic objective' should not be interpreted as one where economic need is paramount over the harm caused. The Strategy for Surrey set out in the current approved Surrey Structure Plan 1994 states at para 1.12:

"1.12 Care of the environment must therefore be the paramount aim. This includes not only concern about the physical environment, such as towns and villages, the countryside and open spaces, but also about noise, pollution and the conservation of energy and resources. The aim is to bring about a sustainable high quality environment in which change within the natural or built environment is steered by policies which reflect the particular circumstances of Surrey."

This should remain the guiding principle.

- 1b *Should high quality minerals be husbanded as a scarce resource?*

Comment

North West Surrey contains high quality concreting aggregates which should not be extracted unnecessarily for other purposes such as use for bulk fill. It is therefore important that such resources are husbanded, otherwise this could lead to pressure to extend extraction to areas previously excluded because of unacceptable impact on the environment or amenity.

- 1c *Do you consider that sites restored after mineral extraction can bring benefits in terms of biodiversity and recreation opportunities?*

Comment

Clearly this is possible but such 'benefits' should not in themselves be a reason for allowing mineral extraction. Care needs to be taken with regard to recreational provision as this can have environmental and amenity implications of its own. Whilst mineral extraction is a 'County Matter', it should be recognised that such other longer term non-mineral or waste-related developments are planning matters for the Borough Council.

## CONSULTATION ISSUE 2 : THE NEED FOR AGGREGATES

The Government figures for aggregate provision cover the period 2001-2016, and for the South-East Region this is for 212 million tonnes of 'land-won' sand and gravel, equivalent to 13.25 mtpa. The South East England Regional Aggregates Working Party has proposed a figure of 2.62 mtpa for Surrey.

The SMRLP will also need to provide for recycled and secondary aggregates (although not crushed rock). There is no system to apportion the regional provision of such aggregates within the Region.

A 7 year 'landbank' of planning permissions for aggregate minerals is required, which entails allocating reserves within the Plan amounting to the annual apportionment times the number of years which the Plan covers.

2a *Do you consider the regional balance between 'land-won' primary and recycled/secondary aggregates of around 2 to 1 is appropriate for Surrey?*

Comment

The County Council as the Minerals Planning Authority is probably in the best position to judge the appropriateness of any such split, but given the circumstances and the practical limitations of recycling construction and demolition wastes a 2 to 1 balance would seem a reasonable aspiration.

2b *Should the Plan specifically provide for low-grade aggregate for use as fill material?*

Comment

This would be desirable in order to reduce the pressure to use higher grade aggregates. The location of such higher grade aggregates in Runnymede tends to be closer to major construction projects, such as motorway widening, airport expansion etc and therefore might otherwise be favoured under the 'proximity' principle.

2c *Do you think that we should plan up to 2016 or to 2023 in order to have a seven year landbank secured at the Plan end date?*

Comment

A 2016 end date is sufficiently far ahead. The Plan needs to be able to be reviewed within a reasonable time horizon in order to be able to respond to changing circumstances e.g. technical advances for securing alternative supplies, climate and environmental changes etc.

2d *Should we limit aggregate production in Surrey to the apportionment level?*

Comment

Surrey, and Runnymede in particular, has had a long history of mineral extraction making a significant contribution to the Regional (and National) supply of aggregate. This has been at a severe cost to the local environment and the quality of life for residents. Surrey should therefore not be expected to contribute more than that apportioned to it under Regional guidance.

### CONSULTATION ISSUE 3 : LOCATION OF FUTURE EXTRACTION

In North West Surrey aggregate mineral working is broadly split between the river valley gravels and sharp sand of the Thames, Wey and Blackwater. Soft sand is to be found across South Central Surrey.

To meet the current aggregate apportionment of 3.4 mtpa for 1992-2006 requires a split of 40% from North West Surrey and 60% from South Central Surrey. The existing SMLP operates a 'rundown' policy for productive capacity within North West Surrey (3% p.a.) which aims to reduce the cumulative impact over a prolonged period. There is no equivalent rundown policy in South Central Surrey. If the cumulative impact consideration is to be more widely applied in the Replacement Plan, this could mean extending extraction to new (undisturbed) areas rather than as at present favouring the extension of existing workings.

3a *How should aggregate production be allocated between sharp sands/gravel and soft sand – the balance will affect where mineral sites are allocated?*

Comment

The existing 40/60% split should be retained together with a rundown policy for North West Surrey. In practice the 3% rundown of productive capacity has not been achieved. Whilst this may well lead to new areas being opened up, it will offer a degree of relief from those areas which have suffered from decades of working.

3b *Should the Plan continue to favour extending existing sites or turn to new areas?*

Comment

There should be no policy presumption in favour of extending existing sites. Each case should be treated on its own merits, but with particular regard being had to the cumulative impact.

3c. *Are there circumstances where you consider that mineral working should be permitted in the Area of Outstanding Natural Beauty or a Special Protection Area for birdlife?*

Comment

Mineral working should not be precluded from such areas as a matter of policy, but rather each case should be considered on its merits.

3d. *To what extent should mineral working and restoration options be limited by the hazard to aircraft of bird attraction close to Heathrow, Gatwick and Biggin Hill?*

Comment

Clearly there is a need to have full regard to matters of aircraft safety, but the options to work land within such designated areas should not be excluded without detailed examination, including possible mitigation measures.

3e. *Should the Plan avoid areas prone to flooding or harness the flood relief potential of mineral working and restoration?*

Comment

Extensive areas of the floodplain have been affected by mineral extraction and subsequent backfilling. This has resulted in large volumes of porous gravel being replaced by impervious infill material, including clay lined pits. Also ground levels have been raised above historic flood levels in restoration operations. This has undoubtedly had a cumulative impact upon the characteristics of the flood plain. Further mineral working in flood risk areas should therefore be avoided.

Any flood relief potential should be seen as a 'by product' of, and not a justification for, mineral extraction in flood risk areas.

#### CONSULTATION ISSUE 4 : APPROACH TO SITE IDENTIFICATION

'Sieve' analysis has been the method used previously for identifying acceptable sites for mineral working, using geological base data and then overlaying various environmental and other constraints to highlight potential sites. Those sites have then been subject to individual assessments for categorisation within the Plan, currently either Category 1 where working is acceptable in principle or Category 2 where working would be strongly resisted.

Other possible methods include the designation of wider 'areas of search' within which mineral operators would have scope to prospect potential sites.

4a. *Should the traditional 'sieving' methodology be applied for selecting sites for allocation in the Plan?*

Comment

The 'sieve' analysis approach should be retained as it highlights at an early stage the possible conflicts of interest between geologically suitable sites and the environmental and amenity impacts. It also leads to the clear identification of the potential working sites.

4b. *Should sites be specified wherever possible, or (preferred) areas of search indicated for new locations?*

### Comment

It is preferable for the Plan to provide a clear identification of the potential working site rather than defining wide areas of search. The latter would lead to uncertainty and possible 'blight' over larger areas.

- 4c. *Should the categorisation of sites in the existing Plan be maintained, changed or abandoned [Category 1 (in favour of mineral working) and Category 2 (against)]?*

### Comment

The first Mineral Plan, the North West Surrey Mineral Local Plan (NWSMLP) adopted in January 1985, placed potential working sites within three, rather than two, categories :-

Category A = Presumption in favour of proposed mineral working.

Category B = Presumption against mineral working where other suitable land is available.

Category C = Very strong presumption against mineral working.

The former NWSMLP made it clear that sites in Categories A and B would not necessarily be suitable for working and that in considering any planning application each site would still need to be examined on its own merits and against the other policies of the Plan. Whilst at the time the main basis of the Category B designation was the agricultural value of the land, it is felt that three categories would offer a more sensitive approach to identifying potential working sites than the current and proposed two category system. It is therefore suggested that this be the approach used in the Replacement Plan, with further consideration being given as to the precise criteria for the particular categories.

- 4d. *Should the Plan encourage production at a few large sites, where possible, or opt for a larger number of small sites?*

### Comment

The preference would be for a few larger sites providing these can be worked with only limited impact upon environmental and/or residential amenity.

- 4e. *Should the Plan take a restoration-led approach by selecting sites on the basis of their restoration potential?*

### Comment

The approach should be on the basis of an assessment of overall impact, which would include both the extraction and the restoration phases.

- 4f. *How should the balance be struck between safeguarding residential amenity and protecting environmental designation?*

### Comment

In such areas as Runnymede where existing communities have suffered from the adverse effects of mineral extraction and related activities for so long, priority should be afforded to residential amenity.

## CONSULTATION ISSUE 5 : RECYCLED AND SECONDARY AGGREGATES

Recycled aggregates are processed from construction and demolition waste and secondary aggregates are by-products of other processes (e.g. fly ash). The Waste Local Plan sets out planning policies for the processing of such materials at current or former mineral sites. Encouraging the use of mineral processing plant for aggregate recycling is seen as an efficient way to increase recycling.

Aggregate recycling at a mineral site will attract inert waste material, which after processing, leaves a residue which can be used to restore the site. This helps to husband mineral resources and secure restoration, but may prolong the operating life of the site.

- 5a. *Is it reasonable to identify suitable mineral sites as appropriate locations for aggregate recycling, even though most of them will be in the Green Belt?*

Comment

It would not be appropriate to identify such sites in the SMRLP. Such sites should be considered on their own merits, including the implications of prolonging or intensifying such industrial activities not only within the Green Belt but also in terms of impact upon residential amenity. Even where such aggregate recycling is allowed these should be subject to strict time limits and other mitigation conditions.

- 5b. *Do the advantages of aggregate recycling of imported materials on minerals site outweigh the disadvantage of prolonging site operations?*

Comment

Each case needs to be considered on its own merits. The SMRLP should not seek to introduce any presumption in favour of such provision.

- 5c. *How can the use of recycled and secondary aggregates be promoted to save on primary extraction?*

Comment

Without appropriate legislation to require the use of more sustainable materials in building construction there is little direct action available. Planning Authorities could possibly promote greater awareness through information and publicity. In seeking applications for mineral extraction applicants could be required to provide an assessment and evaluation of such alternatives, very much as is required under the Environmental Assessment procedures.

CONSULTATION ISSUE 6 : RESTORATION

Traditionally, Surrey mineral sites have either been restored by landfill for agriculture or, in areas where the water table is high (primarily North-West Surrey), by wet restoration for creating lakes for water sports, amenity and nature habitats. More recycling may mean more wet restorations or longer restoration times.

- 6a. *Do you prefer restoration to land or water?*

Comment

In Runnymede substantial areas of permanent water have resulted from mineral extraction. Whilst it is acknowledged that wet pits can have recreational and ecological value, it is considered that there is already a preponderance of water areas in the northern part of the Borough. This is atypical of the local landscape and has radically altered the nature and form of this part of the Surrey countryside. The traditional landscape in the northern part of the Borough is one of open, flat meadowland broken by hedgerows and tree belts. This, together with the higher, more undulating ground and extensive woodland in the southern and western parts of the Borough, presented a well-balanced landscape. The progressive disruption by mineral extraction has altered this balance. The setting of Thorpe and the northern approach to Chertsey in particular are very much dominated by extensive areas of open water, landscapes which are far removed from the traditional agricultural environment of these two historic settlements, both of which are designated conservation areas.

It is therefore considered that the preference should be for restoration to land. Where this cannot be achieved within a reasonable timescale then mineral extraction should be resisted.

- 6b. *Should the Plan encourage alternatives to agricultural restoration?*

Comment

The Plan should not, as a matter of policy, seek to encourage alternative uses unless these have been specifically identified in the Borough Council's Local Plan (or Local Development Framework). Each case should be treated on its own merits and any restoration leading to alternative land-use should be discussed and agreed with the respective Local Planning Authority.

- 6c. *Should the Plan specifically encourage restoration schemes that make a contribution to enhancing biodiversity by creating particular natural habitats?*

Comment

The lead should be taken from the relevant Borough Council's Local Plan and there should be no general rule.

- 6d. *Should the Plan take a restoration-led approach by setting restoration briefs for sites allocated for mineral working.*

Comment

Restoration Briefs for specific sites would be a useful addition, similar to Planning Briefs prepared for other development sites. However, the release of a potential working site should not be 'restoration-led', in that this could mean less weight being given to other considerations such as residential amenity.

- 6e. *Should applicants for mineral working be required to provide a detailed restoration plan including the intention after-use and long term management of the restored site?*

Comment

Such restoration plans should be required at the outset and be part of the consideration and determination of the application for extraction. Applications failing to provide satisfactory restoration plans should be refused.

- 6f. *Do you agree that the degree to which restoration schemes are designed to reduce attraction to birdlife should diminish with distance from airports and flight paths?  
(Please cross-refer to Question 3d)*

Comment

This would seem appropriate.

CONSULTATION ISSUE 7 : BUFFER ZONES

A new 'buffer zone' policy is being suggested which would seek to provide separation distances between mineral workings and dwellings and other sensitive properties.

- 7a. *Should a buffer zone policy be introduced to the Plan or should the Plan continue to rely on 'technical' development control criteria, e.g. noise, vibration and dust limits, visual intrusion assessments?*

Comment

Whilst 'working margins' have previously been provided on mineral sites, these have more often been designed for stability and access rather than specifically to protect the amenities of adjoining properties. Under the normal 'technical' development control criteria such issues of noise, vibration, dust and visual intrusion have tended to be dealt with by means other than 'separation' e.g. bunds, hours of operation, water dousing etc. Separation distances are an important tool in safeguarding amenity in other forms of development (e.g. housing) and it is considered that a 'buffer zone' policy would be a useful addition to the development control for mineral working.

- 7b. *If a buffer zone policy is included, should it be based on a universal distance around all sites or different distances for individual sites?*

Comment

The policy would be stronger if a minimum desirable distance could be defined, based upon common assumptions applicable to the majority of mineral workings. This however should not preclude the application of greater distances, having regard to the particular circumstances of individual sites and local circumstances.

7c *If a site specific approach is taken, should buffer zone distances be set in the Plan or left to be fixed at the planning application stage?*

Comment

Minimum distances should be set out in the Plan but with the proviso that these may be increased depending upon the particular circumstances of each case (see para 3.45 above). Only in very special circumstances should minimum set distances be reduced.

CONSULTATION ISSUE 8 : RAIL AGGREGATE DEPOTS

There are two rail aggregate depots in the County, in Woking (Town Centre) and Salfords but the latter has recently stopped operating. Both sites are however safeguarded for aggregate depot use in the current SMLP.

8a *Should the Plan continue to safeguard Surrey's two depots?*

Comment

The safeguarding of aggregate depots is in line with Regional Planning Guidance and given that Green Belt policy would preclude new provision (except in very special circumstances), it would seem appropriate that the two existing depots should continue to be safeguarded.

8b *Do we have adequate rail depot capacity for importing minerals?*

8c *Should the Plan be looking for additional/alternative depot sites and seek to safeguard them?*

Comments

The County Council is probably in the best position to make an informed judgement on this. There is considerable inter-regional movement of crushed rock, with the South East importing much of its supply from the South West. In order to husband North West Surrey's mineral resources the importation of crushed rock and secondary materials for making concrete will become increasingly important. With only the Woking Depot currently operating (which imports mostly crushed rock from Somerset) there would seem a 'prima facie' case for seeking additional capacity.

There would seem to be little point in identifying additional/alternative sites if they are not to be safeguarded for that purpose in the Plan.

8d *Should the current Plan continue to discourage new depots in the Green Belt?*

Comment

There should be no change to the policy presumption against inappropriate development in the Green Belt. To do so would be to weaken protection of the Green Belt. Such development should continue to be considered as at present wherein very special circumstances would need to be demonstrated to justify a permission or the continuation of a temporary permission.

CONSULTATION ISSUE 9 : TRANSPORTATION OF MINERALS BY ROAD

Mineral working can generate significant volumes of lorry traffic which can often have more impact on amenity than the mineral extraction itself, and this increases where lorries use minor roads. Regional Policy promotes movement of minerals by rail. The analysis of sites should eliminate sites with significant access problems which cannot be overcome. It is more difficult to assess the cumulative traffic impact of several mineral sites in a general area.

Conditions or voluntary agreements for specific routing of lorries are difficult to enforce. Reducing lorry movements can prolong the life of a pit and delay reinstatement. Conveyor belts or mineral slurry pipes to processing plants can save on local lorry movements.

9a *Should lorry movements be limited to reduce short term impact, even if the limitation prolongs the length of working?*

### Comments

Lorry movements should be restricted where this involves the use of sensitive routes such as past schools and through residential areas.

Consideration should be given to the use of rail depots, where possible, for the export of minerals in addition to imports (ref paras. 3.49-3.51 above).

9b *Should conveyor belts or mineral slurry pipes always be used in preference to lorries for moving extracted material to existing processing plants on adjacent or nearby sites?*

### Comment

There should be a presumption in favour of using alternative means other than lorries but there will still need to be full consideration of the potential impact of such alternatives. Conveyor belt systems for example can be noisy and visually intrusive and such impacts will need to be balanced against the equivalent lorry movements.

### CONSULTATION ISSUE 10 : OTHER MINERALS – SILICA SAND, CLAY, OIL AND GAS, CHALK, FULLERS EARTH AND PEAT

These minerals lie outside North West Surrey and it is not proposed to comment on the questions raised.