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3 February 2022

Dear Mr Jenkins,

**SURREY COUNTY COUNCIL – MINERALS AND WASTE LOCAL PLAN - ISSUES AND
OPTIONS CONSULTATION
RESPONSE BY WOKING BOROUGH COUNCIL**

Thank you for giving Woking Borough Council the opportunity to comment on the Minerals and Waste Local Plan – issues and options consultation document. The importance of having an up to date development plan for the area cannot be underestimated. If adopted, the Minerals and Waste Local Plan will set the framework for determining planning applications relating to minerals and waste management development. It will also be a material consideration for Surrey districts and boroughs when preparing their local development plan documents and making planning decisions. In this regard, the Council welcomes the process to bring the Minerals and Waste Local Plan up to date. Under the Duty to Cooperate, the Council would like to be engaged positively at subsequent stages of the process to adoption.

The consultation document sets out a positive vision for the future management and development of minerals and waste in Surrey. It also sets out 13 objectives that provides a clear and sustainable direction of travel for the management of mineral and waste in the county. These are broadly supported by the Council.

To date separate Plans have been prepared for Minerals and Waste management and development. The emerging Minerals and Waste Local Plan seeks to combine the two Plans into a single Local Plan. Whilst the Council welcomes this as a positive step, the document would benefit from an explanation of why they have been combined and the advantages and shortcomings for doing so.

The Council acknowledges the significance of all the various sections of the documents and the inter-relationships between them. However, for the purposes of this response, the Council has focussed on the issues that are of most concern.

Policy options concerning Rail Aggregate Depots

There are only two rail aggregate depots in Surrey – one in Woking Town Centre and the other in Salfords between Redhill and Horley. Woking hosts the principal and only active rail aggregate depot in Surrey. The depot receives crushed rock and Marine-won sharp sand and gravel imports. These are vital in supporting the construction industry. The Council acknowledges the economic and environmental significance of the rail aggregate depot to Surrey. In particular, it helps provide for the sustainable movement of substantial volumes of minerals and reducing the dependency on road transport with associated congestion and vehicle emissions. It provides jobs and the emphasis on rail movement is consistent with measures to reducing climate change. However, as the document acknowledges, the adverse impacts of rail aggregate depots are particularly acute in urban areas such as Woking Town Centre where sensitive receptors are in proximity and adjacent land-uses may not be compatible with industrial activities. Some of the adverse impacts include unacceptable levels of noise, dust, increased number of HGV movements in residential streets. These adverse impacts have become very obvious with the delivery of the Housing Infrastructure Fund project in Woking.

The aggregates depot is located in a prime town centre location that is one of the most sustainable locations for town centre uses such as housing and office floorspace. Development at this location will be in close proximity to key services and facilities such as the railway station to minimise the need to travel by the car. Various unsuccessful attempts have been made by Woking Borough Council in the past to relocate the facility to an appropriate and suitable location. Woking Borough Council as recently at its meeting on 2 December 2021 considered a Notice of Motion to relocate the depot to a suitable location, and agreed to use its endeavours to encourage Network Rail, Surrey County Council and other partners to move the aggregates yard to a more appropriate and non-residential location. A Task Group of Members has been set up to work with partners to facilitate this. The Council has written to Network Rail to express that consideration be given to finding a suitable alternative location. The Leader of the Council and Jonathan Lord MP have also written to the Leader of the County Council seeking the same consideration. The Council will therefore request that the preparation of the Minerals and Waste Local Plan should be used as an opportunity to find an alternative location that could be safeguarded by policy in the Plan. The 'call for sites' and the work on 'areas of search' provides an opportunity to explore alternative sites. Presently, part of the site has been allocated in the Site Allocations DPD 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 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.

On the basis of the above, the Council strongly supports options that encourage the relocation of the existing rail aggregates depot to locations more suitable to industrial land-uses and activities. Areas of search for new facilities should be identified in the Minerals and Waste Local Plan.

Woking Borough Council would be willing to continue to work in partnership with Surrey County Council to facilitate any relocation process.

Policy options concerning Safeguarding Minerals Resources and Development, and Waste Management Development

Policy MC6 of the existing Surrey Minerals Plan safeguards areas in the borough for minerals resources and development (including the rail aggregates depot) and sets out the protocol for consultation on non-mineral development within and in proximity to safeguarded areas.

In consultation with Surrey County Council, various key requirements have been included within policies of the Council's adopted Site Allocations DPD which reflect the requirements of Policy MC6, including early consultation with the mineral planning authority where any non-mineral development may prejudice the effective operation of sites in existing minerals use or may sterilise mineral resources within mineral safeguarding areas. The requirements of Policy MC6 is already being met by the Council in this particular regard.

The existing Surrey Waste Local Plan was recently adopted in December 2020, and Policy 7 safeguards several sites in Woking in existing waste use and refers to a robust Consultation Protocol regarding proposals for non-waste development on or in proximity to these sites.

The Council is of the view that the existing Policy MC6 of the Minerals Plan and policy 7 of the Waste Local Plan provides a robust and, importantly, flexible approach, based on effective consultation. In this regard, Option One under safeguarding mineral resources, safeguarding minerals development, and safeguarding waste management development is supported: an approach broadly consistent with existing policies.

The overall emphasis on prevention of waste and reuse, recycling and recovery over its disposal is broadly welcome. In 2020/21 54% of household waste arisings were either recycled, reuse or composted. Of the 46% that were not recycled or reused, 42% were used as energy from waste and 4% was sent to landfill. Whilst the overall picture is encouraging because of the direction of travel from previous years, there is significant scope for improvement, and the Plan should provide the necessary policy measures to minimise waste arisings. Residual household waste collected per household increased by 19% between 2017/18 to 2020/21. Effort to reduce this should also be a priority in the Plan.

The Minerals and Waste Local Plan - Issues and Options document does not allocate specific sites for the management and development of minerals and waste. It however includes a 'call for sites' which is an invitation to landowners and the minerals and waste management industry to nominate any land that may be suitable for future minerals and waste management and development. The Council will continue to engage with the County Council to assess any potential to use any of its land assets for these purposes where it is deemed suitable and available.

Overall, the consultation comprehensively addresses climate and biodiversity issues. It is encouraging to see climate mitigation and adaptation, biodiversity loss and net gain, protection of key sites and habitats and improvement of their connectivity, the waste hierarchy and circular economy, rights of way/access to countryside/recreation, and opportunities to develop green and blue infrastructure networks through waste and minerals. The Council also welcomes the clear Climate Change Statement and Restoration and Enhancement Statement. However, whilst the Climate Change Statement refers to Surrey's Climate Change Strategy 2020 and its net zero carbon goal, the 'Legislation, Guidance and Policy' does not appear to acknowledge this key document.

Woking Borough Council supports option 3 at paragraph 21, which encourages higher rather than lower amounts of biodiversity net gain as a minimum expectation. It would be helpful if the County Council could work in partnership with districts and boroughs to undertake the necessary evidence base study to justify a higher requirement.

Reference to the Environment Bill should be updated to Environment Act. Also, the SEA & SA Scoping Report, October 2021 should be updated to also reference the Woking Site Allocations DPD.

The need to protect the overall purpose and integrity of the Green Belt is of paramount significance. The strict controls for the use of Green Belt land for development as set out in the National Planning Policy Framework (NPPF) should continue to apply. In particular, the requirements of paragraphs 143 to 146 should be adhered to when selecting sites for waste management and development.

On a minor detail, the consultation format is time-consuming to navigate. The publication of a single pdf of all of the consultation documents in the future, alongside the commonplace engagement hub form of presentation would be helpful.

I hope you find the above helpful. However, if you have any questions regarding these comments please do not hesitate to contact the Planning Policy Team on 01483 743871 or e-mail: planning.policy@woking.gov.uk.

Yours sincerely,

Ernest Amoako
Planning Policy Manager