

Annex A – Summary of Representations on the Minerals Local Plan: Draft Plan for Consultation Analysis of Responses

1. The Draft Plan was consulted on from 13 August 2014 to 5 November 2014. In total 179 responses were received, providing a total of 264 separate comments (a further eleven organisations provided a response of no comment). Responses received came from statutory organisations, other mineral planning authorities, town and parish councils, environmental groups, the minerals industry and their agents and local residents and councillors. As expected from a Draft Plan that included proposed allocations for mineral extraction, a substantial volume of representations related to this matter. Other main areas of response related to the provision proposed for sand and gravel, the issue of recycling provision and the policy on safeguarding mineral resources. However it should be noted that representations on level of provision for sand and gravel and on recycling of aggregates was often linked back to objections on one or more specific allocations.

Provision for sand and gravel

2. In relation to the proposed provision to be made for sand and gravel (Draft Policy 1) a number of representations queried why the plan was proposing provision based on a three rather than ten year annual average sales. National policy requires consideration not only of a 10 year average but also of the 3 year average figure in order to identify recent trends. The plan proposes a three year based provision figure (0.17 mtpa) rather than a ten year based figure (0.12 mtpa) or the level of provision in the now abolished South East Plan (0.26 mtpa). It should be noted that those questioning the provision figure were basically those who were objecting to an allocation in the plan.
3. Although there was less specific support for the proposed level of provision, it should be noted that through the Local Aggregate Assessment process the minerals planning authorities in the south east had collectively agreed to support the three year provision proposed in the Draft Plan, although the mineral industry had sought further work on whether this figure should be increased.
4. It is considered that the representations made on this matter have not raised issues that require a reconsideration of the proposed level of provision.

Proposed allocations

5. The proposed allocations for mineral extraction (Policy 3) drew the most responses and most outright objections. These largely related to three sites, two at Lathbury and one at Lavendon. The concerns raised related to traffic, impacts of dust and noise, increased flood risk and visual impact and in the case of Lathbury the issue of allocating two sites in relative close proximity to each other.
6. It should also be noted that some potential sites that had undergone assessment but were felt not to be suitable sites to include as allocations in the Draft Plan continued to receive support from the landowner and in the case of a specific site at the urban edge of Newport Pagnell there were a number of objections to any likelihood that the site could come forward.
7. Respondents also suggested a number of small amendments to the boundaries of the sites included in the plan. An additional site between Olney and Lavendon was put forward for consideration for sand and gravel extraction.
8. A number of objectors to the proposed sites also raised the issue of whether there had been a proper exploration of alternative sites, particularly those closer to or adjacent to the Milton Keynes urban area.

9. Although there were many objections received on the proposed sites, the issues raised by respondents are such that it is not considered that these sites- either the three sites subject to the most objections or the other sites proposed for inclusion (or exclusion)- should be specifically reconsidered.
10. However in relation to the representations regarding alternative sites, to prove that the Council has done all it can to encourage the widest range of sites to be considered, for the avoidance of doubt one final round of calling for alternative sites to come forward is now being undertaken. If as a consequence further sites are put forward these will be considered in the context of sites within the Draft Plan. Any sites that, following assessment, are considered to be more appropriate for inclusion than those within the Draft Plan, would need to be consulted on before a Final Draft Plan could be finalised.

Aggregate recycling capacity

11. Based around the content of Policy 7, a number of respondents raised concerns over the aggregate recycling capacity and the low target for recycled aggregates. The Draft Plan does not include a ceiling limit for production of recycled aggregates, rather it seeks to encourage both use and production of such materials. There is insufficient evidence to include specific provision rates and/or local targets for recycled aggregates.
12. It should be noted that some of these representations were made on the basis that the more recycling of aggregates that was undertaken in the Borough the less provision for minerals from new sites for extraction would be required.

Minerals Safeguarding Areas

13. Four developers raised concerns over minerals safeguarding. These related to two matters: firstly, that the Mineral Safeguarding areas (identified to prevent unnecessary sterilisation of mineral resources) cover too broad an area and secondly the inclusion of buffer zones around allocations.
14. The inclusion of buffer zones are in line with national guidance and reflect that incompatible development adjacent to a resource may hinder its extraction. The allocation of MSAs does not conflict with land being allocated for other purposes – proposals for non-minerals development would simply need to comply with Policy 18.

Other representations

15. A number of respondents sought minor amendments to the plan or sought points of clarification but these were on relatively minor issues. There were also a number of respondents that supported specific sections of the plan.