

Milton Keynes Minerals Local Plan
Submission
Statement of Consultation and Engagement
March 2016

Role of the Statement of Consultation and Engagement

When a Local Plan, in this case the Milton Keynes Minerals Local Plan, reaches submission stage, there is a requirement to prepare a formal statement such as this Statement of Consultation and Engagement.

The purpose of the Statement of Consultation and Engagement is to set out:

- Who was invited to be involved in plan preparation,
- How they were invited to be involved in the plan preparation, and
- A summary of the main issues raised and how they have been addressed.

The following sections set how this has been undertaken in relation to the Milton Keynes Minerals Local Plan.

Background to the Minerals Local Plan

Minerals are essential to support economic growth and our quality of life and this is acknowledged as a key part of National Planning Policy Framework (NPPF). It is therefore important that there is a sufficient supply of materials to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation.

Milton Keynes Council is the Minerals Planning Authority (MPA) for the administrative area of the Borough of Milton Keynes. As the MPA, Milton Keynes Council is preparing a new Minerals Local Plan (MLP) in line with the NPPF that will replace the Minerals Local Plan 2006. The emerging MLP will set out the policies and proposals against which planning applications will be determined.

The scope of the MLP will include:

- Vision and objectives for minerals related development within Milton Keynes;
- Spatial strategy for minerals extraction;
- Aggregate provision to be met;
- Commitment to maintaining landbanks;
- Safeguarding of mineral resources and ancillary development/infrastructure;
- Development control and management policies; and
- Identification of specific sites for minerals-related development required to facilitate delivery of the identified aggregate provision.

Consultation on the Issues and Options

The issues and options consultation paper identified the key issues and available strategic options influencing minerals planning in Milton Keynes. Consultation at this stage helped to identify what the plan should include and focus on the most appropriate strategic options for Milton Keynes in order to support sustainable development and communities. In addition stakeholders were given the opportunity to consider the evidence presented to ensure that this was robust and able to support the preparation of the plan. The document identified the key issues for discussion.

- Issue 1 – The Draft Vision and Objectives for the Minerals Local Plan.
- Issue 2a – Identifying a spatial strategy for sand and gravel extraction.
- Issue 2b – Identifying a spatial strategy for limestone extraction.
- Issue 3 – The Plan period.
- Issue 4a – Provision of sand and gravel.
- Issue 4b – Provision of limestone, brick clay and secondary and recycled aggregates.
- Issue 5a – Resource areas to be safeguarded.
- Issue 5b – Identifying the Minerals Safeguarding and Consultation Areas.
- Issue 5c – Safeguarding permitted sites, ancillary development and supporting infrastructure.
- Issue 5d – Implementing the Minerals Safeguarding and Consultation Areas and promoting prior extraction.
- Issue 6a – Development criteria for minerals extraction.
- Issue 6b – Secondary and recycled aggregates.
- Issue 7 – Policies to manage and control development.
- Issue 8 – Land use compatibility.
- Issue 9 – Amenity.
- Issue 10 – Restoration and after-use.
- Issue 11 – Tackling climate change.
- Issue 12 – Other matters to be addressed.
- Issue 13a – Potential sites for minerals related development.
- Issue 13b – Other potential sites for minerals related development.
- Issues 13c – Identifying broad areas of search.
- Issue 14 – The approach to be taken in the site selection.

Consultation on the issues and options was undertaken over twelve weeks during the period Wednesday 30 October 2013 to Wednesday 22 January 2014. Documents published alongside the issues and options included Habitats Regulations Assessment Scoping Report, Draft Local Aggregates Assessment, Annex 1 Site Assessments, Minerals Safeguarding Area Methodology, Site Assessment Methodology and Sustainability Appraisal Scoping Report.

Notifications at the start of the consultation were sent to 526 contacts on our mailing list. There were 405 emails sent out and 121 letters. The list below shows the types of bodies on our mailing list.

Adjoining Authorities
 Adjoining Parishes
 Agents
 Business Groups
 Community Residents Groups
 County Bodies
 Developers
 Duty to Co-operate Authorities*
 Education
 Environmental Groups
 Faith, Race, Gender and Disability Groups
 Government
 Government Bodies
 Health
 Industry – Minerals
 Industry – General
 Infrastructure/Utilities
 Landowners

Members of Parliament/Members of European Parliament
Minerals Organisation
Milton Keynes Borough Councillors
Parish Councils
Private Individuals
SEA Consultation Bodies

*Duty to Co-operate Authorities are all the other minerals authorities in England and Wales.

The notification letters/emails stated that copies of the documents could be forwarded on request, but also that documents could be viewed at Milton Keynes Council Libraries and the Milton Keynes Civic Offices. The full documentation was also placed on the Council website and the Councils online consultation system.

During the issues and options consultation period Council officers attended three parish meetings and three parish forums to answer questions that people had on the emerging Minerals Local Plan and to help groups to consider how to respond to the consultation.

In total 50 responses were received with one more specifically making no comment. Most responses received were in relation to issue 13a the potential sites for minerals related development with landowners, operators, local residents, parish councils, government organisations and conservation groups all responding to the issue. All the issues discussed in the document received a large number of responses, with many organisations providing additional comments. Some responses suggested wording and amendments and points of clarification and these suggestions were considered to see if it was appropriate to include these in the plan.

A summary of the responses and the suggested policy approach is included as Appendix 1.

Consultation on the Draft Plan

The Draft Minerals Local Plan for consultation was published on Wednesday 13 August and consultation ran until Wednesday 5 November. The draft plan was prepared by considering local factors but also the responses to the issues and option, along with other evidence to determine the most appropriate options for Milton Keynes.

As with the issues and options consultation, all consultation documents were published on the Councils website and the council's online consultation system. Those that were notified during the issues and options consultation were notified again and those that received emails had a direct link provided for stakeholders to access all the documents online. Stakeholders could again request copies of the documents and again all documents could be viewed at the libraries and at the Civic Centre.

Documents that were published for consultation in support of the Draft Minerals Local Plan included the Draft Local Aggregates Assessment, Site Assessment Methodology, Annex 1 Site Assessments, Habitats Regulations Scoping Report, Strategic Flood Risk Assessment, Sustainability Appraisal Scoping Report, Minerals Safeguarding Areas Report and the Sustainability Appraisal Environmental Report.

Council officers again attended four parish meetings and a parish forum to answer questions and provide assistance on responding to the plan.

In total 179 responses were received, providing a total of 264 separate comments (a further three organisations provided a response of no comment). Responses received came from

environmental groups, residents and Councillors, English Heritage, Natural England, minerals industry, town and parish councils and county councils. The main topic that the majority of respondents commented on was the proposed sites for extraction although most policies also received comments.

The Policy that drew most responses was Policy 3 the proposed sites for mineral extraction. There were three sites in particular that received the most comments, being the sites around Lathbury and the site in Lavendon. Some of the concerns raised included an increase in HGV traffic, impacts of dust and noise, increased flood risk and visual impact. A number of respondents felt that other sites in the county had not been fully explored, especially those closer to urban areas.

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. Respondents also provided a number of small amendments to the boundaries of the sites included in the plan and an additional site was put forward for consideration.

One respondent to Policy 1, felt that the 3 year average was a suitable level of provision for sand and gravel whereas most other respondents questioned why the 10 year average was not being used as it was felt the 10 year average was more representative of the current situation in MK.

On Policy 7 a number of respondents raised concerns over the aggregate recycling capacity and the low target for recycled aggregates.

Four developers raised concerns over the Minerals Safeguarding Areas highlighting the fact they are too generalised and the inclusion of buffer zones around the mapped deposits.

A number of respondent highlighted typographical errors or points of clarification. There were also a number of respondents that supported different sections of the plan.

Comments were also welcomed from councils around the country under the duty to co-operate. Nine councils provided comments with an additional eight providing a response of no comment. The main comment raised included the reliance on adjoining authorities to process recycled aggregates. Most council's supported the content of the Minerals Local Plan.

An additional targeted call for sites concentrating on land in the Ouse and Tove Valleys took place in January to February 2015 to investigate if there were any additional sites that have previously not come forward for assessment. Any sites put forward were to be considered in the context of sites included within the Draft Plan.

The representations can be viewed online at: http://miltonkeynes-consult.objective.co.uk/portal/dev_plans/minlp/mlp_draftplan/mlp_draft_aug14?page=0&pageSize=20&status=&tab=list&sortMode=response_date&q:sortMode

Consultation on the Final Draft Plan (Proposed Submission)

The Minerals Local Plan Final Draft Plan (Proposed Submission) was published on Wednesday 27 January 2016 and the period for representations ran for a formal period of six weeks finishing on Wednesday 9 March 2016. The Final Draft Plan included changes made as a result of the Draft Plan consultation and was the document the council considered should be adopted as the new Minerals Local Plan.

The Final Draft Plan consultation was carried out in the same way as for the Draft Plan, with stakeholders being notified by email or letter and copies of the documents placed online and at libraries and the Civic Centre. All the supporting documents (updated and amended as appropriate) were again made available alongside the Final Draft Plan. Council officers again attended four parish meetings to explain to stakeholders how to respond to the Draft Plan.

In total 22 responses were received, providing a total of 42 separate comments. Responses came from the Environment Agency, Highways England, adjoining minerals planning authorities, Borough Councillors, parish councils/meetings, private individuals and a developer.

Objections related to two allocations comprised a significant proportion of the representations. Annual provision was raised by two respondents who both sought an alternative approach (but not a 10 year annual average). In relation to Landbanks a County Council raised concern with the terminology “seeking to maintain” a landbank on the basis that it is not positive enough. A developer raised concerns over identifying the land along the River Ouzel as a primary area of focus and seeks the deletion of the area to the south of Newport Pagnell from the MSA. Three ward members raised concerns over the call for sites process and how they consider the process flawed. A Parish Meeting felt a greater emphasis on recycling aggregates should be included in the Plan and concerns were raised by two respondents in relation to whether the council has sufficient resources to monitor the implementation of the plan.

In terms of the allocations eight residents objected to the allocation at Passenham on the grounds of the impact on the village. One parish raised a number of concerns in relation to the sites near Lathbury, and raised concerns with the content of the site profiles. Residents and a parish council raised concerns over traffic impacts in relation to the site at Lavendon.

Responses also included those giving broad support for the plan or to specific elements of it.

The representation can be viewed online at: http://miltonkeynes-consult.objective.co.uk/portal/dev_plans/minlp/mlp_fdp

Conclusions

In moving towards submission of the Minerals Local Plan, the Council considers it has complied in relation to consultation and engagement with that which it required under the regulation and in the adopted Statement of Community Involvement.

The engagement and consultation carried out has appropriately informed the content of the Minerals Local Plan.

Appendix 1: Summary of Issues and Options Consultation Responses.

Strategic issue and identified options	Summary of consultation responses	Preferred approach / Draft plan policy
<p>Issue 1 - The draft vision and objectives for the Minerals Local Plan</p> <p>The MLP requires its own vision and objectives which should reflect local circumstance and set out the desired outcomes for the plan. The vision and objectives will act to inform the development of the plans emerging policies.</p> <p>The issues and options consultation paper included draft vision and objectives for the Minerals Local Plan, views were sought as to whether these were appropriate and reflected Milton Keynes' local circumstance.</p>	<p>Total comments 20, of which: 7 said Yes; and 6 said No and 7 gave a general comment.</p> <p>Industry Supportive of the vision and objectives Concern was raised about objective 10 and the ability to provide alternative methods of transport. Vision and objectives need to have a theme of self sufficiency included.</p> <p>Environment groups Supportive of objective 6 but would like it broadened</p> <p>Government organisations Most organisations are supportive of the objectives. Objective 9 should be elaborated on to encompass potential for networks for biodiversity at a landscape level. Reference to the historic environment should be added to the draft vision and objective 6 should be made stronger.</p> <p>Other Authorities Concern that MK is not meeting the needs of national and regional supply More work is needed on the Duty to Co-operate Community / private individuals Mixture of support and objection to the vision and objectives.</p>	<p>Preferred approach The vision and objectives outlined in the issues and options consultation paper have largely been carried through to the Draft Plan unaltered with the exception of objectives 6 and 7 which were amended to more closely align with the NPPF.</p>
<p>Issue 2a – Identifying a spatial strategy for sand and gravel extraction</p> <p>Sand and gravel are economically the most important mineral resource in Milton Keynes. The MLP needs to identify how the extraction of such resources should relate to other plans and land uses.</p> <p>Views were sought on several options identified in order to determine the most appropriate strategy for sand and gravel extraction, these included:</p> <p>i. Identifying all sand and gravel resources as per the approach taken in the MLP 2006.</p> <p>ii. Focus on resource areas that are well-related to the main built-up areas of Milton Keynes.</p>	<p>Total comments 14, of which: 7 supported option 1; 1 supported option 2; and 4 supported option 3 and 2 gave a general comment.</p> <p>Industry Option1 as this provides the greatest flexibility and operators need as much flexibility as possible. Option 2 as this is most sustainable in providing the widest range of construction materials in closest proximity to the market. Option 3 would reduce the risk of cumulative impacts.</p> <p>Other Authorities Option 1 as it is a flexible approach</p>	<p>Preferred approach The preferred approach is a blend of the outlined options. It includes all of the resource areas identified in the latest BGS study for sand and gravel resources (BGS 2010 Sand and gravel resources of Milton Keynes Borough) but applies a hierarchy of preferred areas with (roughly) those areas in option ii forming the primary focus areas and those within option iii forming the secondary focus areas. In this manner the plan seeks to provide for flexibility and a focus for industry investment.</p> <p>Draft plan policy Policy 2: The spatial strategy for sand and gravel extraction</p>

<p>iii. Focus on the largest available resources north of the M1.</p>	<p>Community / private individuals Option 3 condemns a small number of communities to endless extraction. Option 3 ensures the greatest capacity of resources are available for extraction Option 1 as it covers all possible resources and which can ensure you reach the best possible solutions</p>	
<p>Issue 2b – Identifying a spatial strategy for limestone extraction Although extraction of limestone takes place on a much smaller scale in Milton Keynes than sand and gravel it may still be beneficial to identify a spatial strategy or policy approach for such development. Views were sought on several options identified in order to determine the most appropriate strategy for limestone extraction, these included: i. Not identifying a specific strategy for the extraction of limestone as per the approach taken in the MLP 2006. ii. Identify all Blisworth Limestone Formation resource areas within Milton Keynes. iii. Develop a strategic policy on where such development should occur rather than a spatial strategy.</p>	<p>Total comments 13 of which: 5 supported option 1; 4 supported option 2; and 3 supported option 3 and 1 gave a general comment. Industry Option1 as this provides the greatest flexibility and operators need as much flexibility as possible. Option 1 as the specialist nature of buildings tones require the greatest of flexibility Government organisations Would welcome special consideration being given to small scale extraction of limestone to support conservation of historic buildings. Other Authorities Limestone should be safeguarded and if applications come forward it should be considered under relevant policies. Community / private individuals Option 2 as it will provide certainty to the council that it can meet potential demand for limestone. Option 2 as it covers all possible resources and which can ensure you reach the best possible solutions</p>	<p>Preferred approach The preferred approach is a blend of the outlined options. The plan does not identify a specific spatial strategy, however it sets out a preference for the extraction of limestone from the White Limestone formation and secondly from the Blisworth Limestone formation (para 4.19) and identifies development principles for mineral extraction in order to provide guidance for industry. Draft plan policy Policy 5: Development principles for mineral extraction</p>
<p>Issue 3 – The plan period The plan period is the time over which the plan will remain in force upon its adoption. Views were sought on what the plan period for the MLP should be: i. 15 years from its anticipated adoption (i.e. 2030), or ii. a longer period, for example 20 years (i.e. 2035) to give greater direction to the minerals industry.</p>	<p>Total comments 13 of which: 6 supported option 1; and 5 supported option 2 and 2 gave a general comment. Industry Option 1 as will allow suitable long term policies to be drawn up without attempting to plan to far into the future. Option 2 with a plan period of 20yrs to provide greater certainty for the industry but with regular 5 year reviews. Minerals allocations should be identified in two 10 year phases. Other Authorities Option 1 in accordance with the NPPF Community / private individuals Option 1 is long enough, future uncertainties will require</p>	<p>Preferred approach The preferred approach is for a plan period up to the end of 2032. This will be 20 years from the commencement of the plan period. This approach meets national requirements and is a mid-point between the two options.</p>

	<p>re-evaluation before the plan period is up. Option 1 as per NPPF as it is impossible to predict requirements for aggregates that far in the future. Option 2 as provides certainty and NPPF is simply a suggestion.</p>	
<p>Issue 4a – Provision of sand and gravel An annual provision figure for sand and gravel needs to be identified in the plan. The Council has identified a number of potential apportionment / provision figures that could be taken forward as well as local circumstance influencing the provision of sand and gravel in Milton Keynes. Views were sought on what level of aggregates should be provided for from Milton Keynes, the options included: i. 0.28 Mtpa – the current regionally derived apportionment rate. ii. 0.11 Mtpa – the provision rate based on an average of ten years sales. iii. 0.12 Mtpa – the apportionment rate from the MLP 2006. iv. 0.17 Mtpa – the provision rate based on an average of three years sales.</p>	<p>Total comments 14 of which: 0 supported option 1 and 2; 2 supported option 3; and 9 supported option 4 and 3 gave a general comment. Industry Option 4 should be used but should be kept under review and changed at the first formal review if needed. Option 4 as this is more reflective of the current situation. Other Authorities Further assessment need to consider future population, housing completions etc and may justify a figure of 0.2mtpa or more. Option 4 as would provide an adequate supply of aggregates and provide flexibility should demand increase. Community / private individuals Option 4 is the only figure which there is evidence to take forward. Option 3 as calculations must be based on estimated figures due to confidentiality and there is no reason to expect a larger annual demand that that used in 2006.</p>	<p>Preferred approach The preferred approach is for an annual provision rate of 0.17Mtpa (the provision rate based on an average of three years sales), option iv. This option is in line with the NPPF, reflects recent sales trends and provides a mid-point between the highest and lowest of the rates identified. This is an average provision figure and no ceiling limit is placed on extraction where it can be demonstrated to be required to meet MK (and wider) needs. Draft plan policy Policy 1: Providing for sand and gravel</p>
<p>Issue 4b - Provision of limestone, brick clay and secondary and recycled aggregates There is general support for the provision of building stone and secondary and recycled aggregates as well as brick clay and limestone for aggregate purposes, however it is not considered necessary to identify a specific provision for the supply of these minerals (a continuation of the approach in the MLP 2006). Views were sought on whether this was an appropriate way forward for Milton Keynes.</p>	<p>Total comments 11 comments of which 10 said Yes and 0 said No and 1 gave a general comment. Community / private individuals It is important to ensure the extraction of small quantities of limestone, it will not be necessary to identify location specific supplies.</p>	<p>Preferred approach The preferred approach is as stated in the issues and options consultation paper. The plan identifies development principles for mineral extraction in order to provide guidance for industry. Draft plan policy Policy 5: Development principles for mineral extraction</p>
<p>Issue 5a - Resource areas to be safeguarded Whilst sand and gravel is recognised as being of national importance, limestone could be considered to be of local importance and as such it may be prudent to also safeguard these resources. Several options for identifying mineral safeguarding</p>	<p>Total comments 10 of which: 3 supported option 1; 1 supported option 2; 4 supported option 3 and 2 gave a general comment. Industry Option 2 as only need to consider safeguarding resources of national and local importance.</p>	<p>Preferred approach The preferred approach is to include both sand and gravel and limestone from the Blisworth and White Limestone Formations within the MSAs (option iii) as this ensures that minerals of current and potentially future value are safeguarded for future generations. This</p>

<p>areas were identified, views were sought on which option was the most appropriate. The options included:</p> <ul style="list-style-type: none"> i. MSAs should include only sand and gravel resources. ii. MSAs should include both sand and gravel and limestone from the Blisworth Limestone Formation only. iii. MSAs should include both sand and gravel and limestone from the Blisworth and White Limestone Formations. 	<p>Option 3 as limestone is of local importance and will become more important as the sustainability agenda moves forward.</p> <p>Option 1 as there is low production of limestone and a large resource is does not need to be safeguarded.</p> <p>Other Authorities Brick clay to the north and east of the city should also be safeguarded Community / private individuals Need to safeguard appropriate and adequate areas for extraction, therefore it is important that both Limestone formations are safeguarded.</p>	<p>approach is in line with the NPPF. Draft plan policy Policy 18: Mineral Safeguarding and Consultation Areas</p>
<p>Issue 5b – Identifying the Mineral Safeguarding and Consultation Areas</p> <p>National guidance requires the identification of MSAs and MCAs. A draft methodology has been prepared based on based on the BGS 2011 Mineral Safeguarding in England: A Good Practice Guide.</p> <p>Views were sought on whether the proposed methodology for defining MSA / MCAs within Milton Keynes was appropriate.</p>	<p>Total comments 13, of which 7 said Yes and 5 said No and 1 gave a general comment.</p> <p>Industry Support the exclusion of previously worked sites It is not clear whether buffer zones are incorporated into the MSA/MCAs so this needs clarification. MPA's should safeguard any existing planner or potential mineral assets. The good practice guidance does not reflect the NPPF which encourages the prior extraction of mineral where practicable and environmentally feasible. This test needs to be applied to both the impact on the non-mineral development as well as the minerals.</p> <p>Environment groups Strongly disagree with not excluding environmental designations; all designations should be excluded from inclusion within an MSA.</p> <p>Other Authorities Query why MK is safeguarding minerals in an urban area as presumably these are already sterilised.</p>	<p>Preferred approach The preferred approach is as stated in the issues and options consultation paper (i.e. MSAs have been created based on BGS guidance). Policy regarding prior extraction has been developed in line with the NPPF. Draft plan policy Policy 18: Mineral Safeguarding and Consultation Areas</p>
<p>Issue 5c – Safeguarding permitted sites, ancillary development and supporting infrastructure</p> <p>MCAs can also provide an additional measure of safeguarding to permitted sites and associated infrastructure.</p> <p>Views were sought on whether the Milton Keynes MCAs should include associated infrastructure.</p>	<p>Total comments 12, of which 8 said Yes and 4 said No</p> <p>Industry NPPF states the existing, planned and potential infrastructure should be safeguarded. MCA's should include associate infrastructure. MSA's should be much more robust to provide mineral operators with necessary reassurance to continue to develop the assets and resources identified in the plan. If a site is "permitted" then it should already be</p>	<p>Preferred approach The preferred approach is to safeguard permitted sites and associated infrastructure through a stand-alone policy and apply consultation buffers to these separate to the MCAs as this will be easier to maintain and update rather than amending the MCAs. Draft plan policy Policy 19: Safeguarding of minerals-related development and associated infrastructure</p>

	<p>safeguarded. There is little to be gained by safeguarding proposed sites if the industry do not wish to develop them.</p> <p>Other Authorities To accord with the NPPF, the associated infrastructure to be safeguarded should be expanded to include concrete batching plants, aggregates recycling, asphalt and stone coating plants.</p> <p>Community / private individuals Necessary infrastructure associated with MCA's will come forward only following the grant of planning permission. Therefore the infrastructure will be subject to necessary scrutiny.</p> <p>This proposal is to allow developers to maintain their processing plant, roads etc in place once set up so as to await their next movement onto fresh territory. This would therefore provide an excuse to delay the expected restoration.</p>	
<p>Issue 5d – Implementing the Mineral Safeguarding and Consultation Areas and promoting prior extraction</p> <p>In order to ensure effective implementation of MSAs it is proposed to include a criteria based safeguarding policy setting out developer requirements so that it is clear what an application in a MSA should include, how it will be determined and how prior extraction will be encouraged.</p> <p>It should not be necessary for every planning application within a MSA to be subject to consultation. The use of development thresholds and exemption criteria is proposed to ensure that only those applications that may result in sterilisation are subject to consultation. Views were sought on whether the proposed policy direction and thresholds for implementing MSA / MCAs and promoting prior extraction were appropriate.</p>	<p>Total comments 10, of which 8 said Yes and 1 said No and 1 gave a general comment.</p> <p>Industry Any policy wording needs to be clear that prior extraction is not a requirement and the evidence to demonstrate why this cannot be undertaken should be proportionate and not overly onerous.</p> <p>Community / private individuals All planning applications should be subject to consultation without exception. To suggest otherwise makes life too easy for the developers and harder for the rest of us.</p>	<p>Preferred approach The preferred approach is as stated in the issues and options consultation paper. Policy regarding prior extraction has been developed in line with the NPPF. Development thresholds and exemption criteria are set out in para 6.8. Draft plan policy Policy 18: Mineral Safeguarding and Consultation Areas</p>
<p>Issue 6a – Development criteria for minerals extraction</p> <p>Development criteria provide a clear indication of what development is considered acceptable and how applications will be decided. A range of factors to be addressed through the development criteria have been identified.</p> <p>Views were sought on whether the factors to be</p>	<p>Total comments 15, of which 11 said Yes and 3 said No and 1 gave a general comment.</p> <p>Industry Surprised that no consideration appears to have been given to the locational context of proposals. Sterilisation needs to be qualified and guidance refers to “needlessly sterilised” indicating that sterilisation can</p>	<p>Preferred approach The preferred approach is as stated in the issues and options consultation paper. Draft plan policy Policy 5: Development principles for mineral extraction</p>

<p>included in the development criterion were appropriate.</p>	<p>take place in appropriate cases. Environment groups Strongly recommend inclusion for consideration, potential adverse impacts on;- legally protected species and species of principle importance – designated sites of international, national and local importance – habitats of principle importance. Government organisations Agree with list of potential adverse impact and welcome the inclusion of surface and groundwater quantity. Recommend that the SFRA is added to the evidence base of the MLP. Recommend that guidance is included with the MLP for assessment of windfall sites based on these criteria. Support the inclusion of development criterion that supports the supply of locally sources building materials. Other Authorities How will MK ensure that a proposal will “promote an appropriate end use of primary aggregate”? Consider that “the identification of significant environmental and biodiversity benefits” should also be included in the criterion. Community / private individuals Particularly important that the Local Authority strongly supports proposals for the sufficient supply of minerals including the supply of locally sourced building materials. Important that the criteria should include considering the context of the surrounding area, with particular emphasis on the effect of those living and working in the vicinity.</p>	
<p>Issue 6b – Secondary and recycled aggregates The use of secondary and recycled aggregates should be encouraged to reduce the need to extract primary resources, as such development criteria should be identified to guide development and inform the decision-making process. A range of factors to be addressed through the development criteria have been identified. Views were sought on whether the factors to be included in the development criterion were appropriate</p>	<p>Total comments 12, of which 10 said Yes and 1 said No and 1 gave a general comment. Industry Would like to see clearer reference between the links of a sustainable operation located on an existing minerals site including a locational preference for such facilities. Other Authorities Policy should also include “locations criteria” to guide applicants towards appropriate sites. In addition to the locations criteria, this should include “areas of despoiled, contaminated or derelict land”. MK need to place great emphasis on supporting the production of recycled aggregates by finding new sites</p>	<p>Preferred approach The preferred approach is as stated in the issues and options consultation paper and also includes preferred locations to accommodate such development. Draft plan policy Policy 7: Development principles for facilities for secondary and recycled aggregates</p>

	<p>as all of its existing capacity is temporary. Community / private individuals Secondary and recycled aggregates should be considered and encouraged especially as MK is now seeing demolition prior to development.</p>	
<p>Issue 7 – Policies to manage and control development In order to reduce potentially adverse impacts resulting from minerals-related development it is necessary to include policies to manage and control development. A range of factors to be addressed through the emerging policies have been identified. Views were sought on whether the factors to be addressed were appropriate</p>	<p>Total comments 14, of which 11 said Yes and 0 said No and 3 gave a general comment. Industry Allowing minerals extraction on a site could sterilise it for a number of years therefore impacting on the delivery of any allocated sites. The criteria could therefore be widened to include allocated sites. Government organisations The factors to be addressed in policy are appropriate, most notably traffic and access. Supports the indication that the potential adverse impacts that will need to be considered in developing policy could include heritage assets. Other Authorities Potential adverse impacts that need to be considered in policy should be expanded to include disturbance associated with illumination and mud on the highway. The Plan should recognise that there could be wider impacts beyond the MK area and the impact should be jointly assess with the relevant neighbouring authorities. Community / private individuals Important to ensure that proposal for the extraction of minerals are undertaken in a sustainable and logical manner and which do not adversely affect the natural or historic environments.</p>	<p>Preferred approach The preferred approach is to address the factors identified through the issues and options consultation paper through a range of policies. Draft plan policy Policy 5: Development principles for mineral extraction Policy 9: Natural assets and resources Policy 10: Historic environment and heritage assets Policy 11: Landscape and townscape character Policy 12: General amenity Policy 13: Sustainable transport Policy 14: Site design and layout Policy 19: Safeguarding of minerals-related development and associated infrastructure</p>
<p>Issue 8 – Land use compatibility Buffer distances from mineral development are currently applied through the MLP 2006. Views were sought on whether buffers should also be applied to non-mineral development applications to avoid encroachment of incompatible development and reduce the potential land use conflict.</p>	<p>Total comments 11, of which 6 said Yes and 2 said No and 3 gave a general comment. Industry It is considered that the provision of MSA/MCA's alongside the proposed buffers will provide suitable protection and consideration of development proposals within close proximity to allocated or working minerals extraction. Buffer distances should be applied to non-mineral development to help reduce potential land use conflict. The MSA/MCA should provide an appropriate tier of</p>	<p>Preferred approach The preferred approach is to apply separation areas to minerals development to trigger consultation on proposals for non-minerals development in order to give consideration to mineral interests early in the decision-making process and avoid encroachment of incompatible development and reduce the potential land use conflict. Draft plan policy Policy 19: Safeguarding of minerals-related development and associated infrastructure</p>

	<p>management in this regard. Buffer zones are a somewhat “blunt instrument” and can give rise to needless sterilisation and misleading expectation. Separation distances should be criteria based to take account of the site specific solution Other Authorities If it is intended that buffer zones are established around existing and allocated mineral sites and any applications for non-mineral development within those zones trigger a consultation then we would support such an approach.</p>	
<p>Issue 9 – Amenity In preparing the MLP there is an opportunity to include more detailed dust and noise guidance. Views were sought on whether the dust and noise guidance set out in the NPPF: i. will be adequate when applied at a local level to prevent environmental nuisance effects, or ii. should be expanded on by including more detailed guidance in the MLP.</p>	<p>Total comments 11, of which 4 said will be adequate when applied at a local level to prevent environmental nuisance effects and 3 said should be expanded on by including more detailed guidance in the MLP and 3 gave a general comment. Industry Issue 7 can be suitably worded to cover dust and noise. Noise levels can therefore be determined at the detailed design/application stage when specific details are known about the development and levels of activity. NPPF is adequate for dust and noise issues otherwise there will be considerable inconsistencies between different authorities. Community / private individuals Policy should identify future gravel extraction possible sites and encourage advance mitigation measures so they are more mature when gravel extraction takes place.</p>	<p>Preferred approach The preferred approach is to not expand on guidance set through the NPPF regarding dust and noise, however the plan includes a general policy addressing amenity impacts. Draft plan policy Policy 12: General amenity</p>
<p>Issue 10 – Restoration and after-use The current policy approach is quite detailed and structured; this may restrict innovation by not allowing for other forms of after-use not set out in the policy. Views were sought on whether there a need to broaden local policy relating to restoration and after-care in order to maximise the potential opportunities and outcomes, or if the document should continue with the approach taken in the MLP 2006.</p>	<p>Total comments 14, of which: 9 said Yes, the document should include a broader policy relating to restoration and after-care; and 2 said No, the document should continue with the approach taken in the MLP 2006 and 3 gave a general comment. Industry Would be useful for the document to contain a broader policy and guidance on restoration and after-care and would accord with the NPPF. Greater flexibility should be given as a more prescriptive approach could deter landowners from releasing the mineral if the restoration of the site in not supported.</p>	<p>Preferred approach The preferred approach is to broaden the local policy relating to restoration and after-care in order to maximise the potential opportunities and outcomes. Draft plan policy Policy 16: Restoration and after-use</p>

	<p>Government organisations We welcome 3.21 which aspire to the potential for an area specific restoration scheme which could be implemented which would result in ecological and environmental improvements. Policy should still be robust in requiring a satisfactory standard of restoration.</p> <p>Other Authorities The 2006 plan lists the things to consider, but is not prescriptive in terms of what sorts of use sites should be restored to. The MLP 2006 approach is more helpful to applicants.</p> <p>Community / private individuals Should include a broader policy relating to restoration and after-care. No need to broaden the possibilities, which may cause temporary disruption of the local environment to become a permanent disaster. Make more flexible to allow for a restoration and after-use policies on an area by area basis. Operators need tighter controls and the use of bonds should be implemented to reduce the risk of failure to restore.</p>	
<p>Issue 11 – Tackling climate change It is proposed that the plan should address climate change by promoting sustainable transport movements and methods, encouraging the use of secondary and recycled aggregates and ensuring that where possible restoration of sites aims to address factors such as flood risk (through alleviation schemes) and enhancing biodiversity and landscape where appropriate. Views were sought on whether the MLP policy framework should:</p> <p>i. Include a specific policy addressing climate change and the transition to a low carbon future. Are there other elements that should be included within such a policy? Please provide details.</p> <p>ii. Address these elements elsewhere in the plan (i.e. with other related issues such as reducing the impact of development, restoration, etc as appropriate).</p>	<p>Total comments 12, of which 5 said to include a specific policy addressing climate change and 3 said address these elements elsewhere in the plan and 3 general comments.</p> <p>Industry Can be suitably addressed through other policies in the plan and through national standards and guidance, this will allow the plan to be kept up to date. At the local level of the plan it is not practical to deliver minerals by any other means than by lorry. Water/rail transport is generally for bulk movements over longer distances.</p> <p>Government organisations Should address climate change by promoting sustainable transport movements and methods to limit carbon emissions. Restoration schemes have been used to provide flood alleviation and we would welcome proposals where current and future flood risk is included into restorations</p>	<p>Preferred approach The preferred approach is to include a specific policy addressing climate change (option i). Draft plan policy Policy 15: Addressing climate change</p>

	<p>schemes. Other Authorities Policy should include “use of efficient and well maintained operational plant”, “specialist planting, such as drought resistant species”, “emission measures”. Community / private individuals Should be conditions to any consent to require positive contribution to the sustainable objectives. Extraction of materials close to use should be encouraged. Secondary and recycled aggregates use should be mandated in developments with a minimum % target.</p>	
<p>Issue 12 – Other matters to be addressed A range of other local planning matters to be addressed through the plan have been identified including implementation, monitoring and borrow pits. Views were sought on whether the proposed policy direction to be taken forward through the emerging MLP for these matters was appropriate.</p>	<p>Implementation Total comments 11, of which 10 said Yes and 1 said No Industry There needs to be a clear policy that will enable non-allocated sites to be considered in view of the very limited availability of minerals. This is needed to provide flexibility as well as help maintain a supply. It is considered that the proposed policy direction is appropriate in respect of the other local planning matters, particularly with regard to implementation of mineral workings, monitoring of the Minerals Local Plan and the construction and use of borrow pits. Other Authorities Agree that there should be a policy covering borrow pits but do not think there should be ones on implementation and monitoring.</p>	<p>Preferred approach The preferred approach is to include a specific policy relating to general administration and implementation requirements in the MLP setting out what the overall requirements are for a planning application and what planning conditions are likely to entail; this will increase clarity of the decision-making process for industry and other stakeholders (such as the community) alike. Draft plan policy Policy 17: Implementation</p>
	<p>Monitoring Total comments 11, of which 10 said Yes and 1 said No Industry Proposed planning matters will provide guidance to developers, the LPA and community on the requirements of development proposals and how they will be monitored. It is considered that the proposed policy direction is appropriate in respect of the other local planning matters, particularly with regard to implementation of mineral workings, monitoring of the Minerals Local Plan and the construction and use of borrow pits. Other Authorities</p>	<p>Preferred approach The preferred approach is as per the issues and options consultation paper to include requirements for monitoring in the implementation policy and to outline mentoring requirements of the plan through a separate section including a monitoring framework to be reported on an annual basis in the monitoring report. Draft plan policy / relevant section Policy 17: Implementation Section 7: Monitoring Minerals Local Plan monitoring framework</p>

	<p>Agree that there should be a policy covering borrow pits but do not think there should be ones on implementation and monitoring.</p> <p>Borrow pits Total comments 11, of which 10 said Yes and 1 said No Industry It is considered that the proposed policy direction is appropriate in respect of the other local planning matters, particularly with regard to implementation of mineral workings, monitoring of the Minerals Local Plan and the construction and use of borrow pits. Other Authorities Agree that there should be a policy covering borrow pits but do not think there should be ones on implementation and monitoring.</p>	<p>Preferred approach The preferred approach is to continue the approach taken in the MLP 2006, proposals for other windfall sites such as agricultural reservoirs will be determined against development principles for mineral extraction. Draft plan policy Policy 6: Borrow pits</p>
<p>Issue 13a - Potential sites for minerals-related development A total of five sites have been identified as potential sites for minerals-related development including: Sand and gravel extraction Site 1: Northampton Road, Lathbury Site 2: Haversham Road, New Bradwell Site 3: Calverton Road, Calverton Limestone (building stone) extraction Site 4: Rectory Farm, Lavendon Site 5: Woodlands Farm, Weston Underwood Views were sought on whether any of the sites were considered to be appropriate to accommodate the proposed minerals-related development and taken forward as a proposed allocation in the draft plan.</p>	<p>Site 1: Northampton Road, Lathbury Total comments 6, of which 1 said No and 5 gave comments Industry Site previously subject to a planning application so there is a good understanding of how site can be developed while mitigating its impacts. Only half the field will be affected by workings. There may be an alternative point of access to avoid traffic going through Lathbury. Environment groups Site includes an area of woodland that is designated as a habitat of principle importance and should be excluded from inclusion within the site. Community / private individuals Close proximity of the site to a small historical village Impacts of noise, dust and overall visual impact with have a significant effect on the village. Site is close to a residential care home and a floristry business. Potential effects on the setting of listing building. Impacts of additional lorry traffic on the B526. Site contains badger setts and a number of bird species. Concern that if the site is restored to its current contours there will be an increase risk of flooding to the inert and impervious material used in restoration.</p> <p>Site 2: Haversham Road, New Bradwell</p>	<p>Preferred approach The following sites have been taken forward as proposed allocations in the Draft Plan: Sand and gravel - Calverton/Passenham Extension, Quarry Hall Farm, Lathbury Quarry and Manor Farm and Lavendon Mill; and Limestone (building stone purposes) - Weston Underwood. Results of the site assessments are summarised in Appendix 1 with the full assessment contained in Technical Annex: Site Assessments. Draft plan policy Policy 3: Site-specific allocations for the extraction of sand and gravel Policy 4: Site-specific allocations for the extraction of building stone</p>

	<p>Total comments 2, of which both gave comments Environment groups Site is designated as a biological notification site and therefore a site of county importance for nature conservation. Up to date habitat surveys should be undertaken at this site to establish the current quality of this site and inform decision making. Government organisations Need to consider potential impacts on the Wolvercote Conservation Area.</p>	
	<p>Site 3: Calverton Road, Calverton Total comments 4, of which 1 said Yes and 3 gave comments Industry Logical extension to the existing operations at Passenham. Government organisations Need to consider any potential impacts on the Passenham Conservation Area. Other Authorities Concern over close proximity of the Passenham conservation area, and would like to know the mitigate measure that would be put in place to limit impact. Issues of additional landscape/visual impact and traffic impact need to be investigated. Community / private individuals Site is incorrectly named and should be renamed to avoid confusing to local residents. Conditions must be put into place to continue to use the existing processing plant. Permissions granted should include conditions to mitigate visual intrusion.</p>	
	<p>Site 4: Rectory Farm, Lavendon Total comments 14, of which all gave comments Government organisations Need to consider any potential impacts on the Lavendon Conservation area and the Lavendon Abbey Scheduled Monument. Community / private individuals Close proximity of the site to the village, and the potential noise and dust that would be generated would</p>	

	<p>impact on the village. Concerns over air pollution Concern over the increase in HGV movements and the potential for mud on the road. The site is located under and around high voltage cables and pylons. Stone is of unknown quality and quantity and the site is too small to make a worthwhile contribution to requirements. Site is located 12 to 15 miles from development sites in MK, which does not emphasise MK's green credentials. Potential impacts on archaeological, geodiversity and biodiversity in the local area. Mapping shows the resource as Cornbrash limestone which has a lower suitability for use as a building stone than Blisworth limestone. Lack of a restoration plan, could lead to loss of soil function. Concern over an increased risk of flooding. Site is located in an area of instability and many of the houses have been underpinned due to subsidence</p>	
	<p>Site 5: Woodlands Farm, Weston Underwood Total comments 4, of which 1 said Yes and 3 gave comments Industry Economically viable resource and contributes towards a local stone supply for building and construction purposes. Will be an extension to an existing site, so will not harm biodiversity, heritage assets or public health. Environment groups Site includes an area of deciduous woodland that is designated as a habitat of principle importance. This area of woodland should be excluded from inclusion within the site. Site appears to be in close proximity to Yardley Chase Site of Special Scientific Interest. Government organisations Need to consider the potential impacts on the Grade II listed Rustic Bridge and is in close proximity to the Grade II listed The Alcove and The Devils Bridge, as well as the Weston Underwood Conservation Area.</p>	
	<p>General comments relating to all sites</p>	

	<p>Total comments 6, of which 5 said Yes and 1 gave comments Government organisations 4 of the 5 sites identified may have public mains or sewers crossing the sites or close to the boundary. Preferable for the boundary of the site to be located to exclude water and wastewater assets. For any proposals associated with these sites a transport assessment should be prepared.</p>	
<p>Issue 13b – Other potential sites for minerals-related development The opportunity for additional sites to be brought forward for inclusion in the plan for minerals-related development was provided through the issues and options consultation paper.</p>	<p>8 additional sites were brought forward through the issues and options consultation stage, including: Quarry Hall Farm, Manor Farm and Lavendon Mill, Land south-east of Stoke Goldington, Land adjoining Lavendon Road, Land near Newport Pagnell, Land north of Sherington Bridge, Land south west of Water Lane, Land west of Sherington Bridge These sites were subject to the same site assessment process as those previously identified with those considered appropriate taken forward into the draft plan and subject to public consultation through the draft plan stage.</p>	As above
<p>Issue 13c – Identifying broad areas of search Views were sought on whether there a need to identify broad areas of search or if the combination of the spatial strategy(ies) for mineral extraction and development criteria would provide sufficient guidance and flexibility. Several options for identifying broad areas of search were identified, including: i. All sand and gravel and limestone resources within Milton Keynes as per the preferred spatial strategy(ies) (refer Issue 2 a and b). ii. Mineral resources considered to be of current economic viability using a minimum yield threshold (e.g. for sand and gravel this could be 0.50 Mt). iii. Mineral resources within previously worked areas in order to maximise recovery of these areas. iv. Mineral resources that are well-related to urban expansion areas (as identified in the adopted Core Strategy).</p>	<p>Total comments Part 1 - 11, of which 5 said Yes and 2 said No and 4 gave comments. Part 2 - 11, of which 5 said option 1, 0 said option 2 and 3, and 1 said option 4 and 5 gave comments. Industry Minerals development proposals not allocated should come forward and be considered on their individual merit. There is no need to identify broad areas of search if there are strong policies for safeguarding mineral sources. The threshold of 0.5mt need to be reviewed as smaller sites may be viable in future. Other Authorities Broad areas of search should focus on all sand and gravel and limestone resources within the plan area. Community / private individuals Planning authorities cannot realistically dictate which</p>	<p>Preferred approach The preferred approach is to not include broad areas of search, this would not value add to the plan as the spatial strategy for sand and gravel and development strategy for limestone, coupled with development criteria, is considered to provide adequate focus and guidance.</p>

	<p>sites may be applied for or when. As broad as area of search for mineral extraction as possible, should maintain as many options as possible.</p>	
<p>Issue 14 – The approach to be taken in site selection In order to inform the decision-making process a Site Assessment Methodology has been prepared. The assessment framework for which plugs into both the SA and plan-making process as it uses base elements from both of these processes. The five sites set out in Issue 13a have already been subject to Stage 1 – Initial screening. Stage 2 will assist in determining the sites to take forward into the draft plan and will involve assessment of the sites against environmental, social and economic criterion. Views were sought on whether the (Stage 2) site selection criterion were appropriate.</p>	<p>Total comments 17, of which 6 said Yes and 3 said No and 8 gave comments. Industry Some of the sites at this stage might not have sufficient information available at this stage to make a fully considered judgement. It should be made clear that all sites will be considered in detail at the time of planning application, and should there be issues that cannot be addressed then permission will not be forthcoming. Concerned at the lack of detail in the stage 2 assessments, does not define the nature of the assessment and does not allow for appropriate engagement with the developer to provide requisite detail. Stage 2 assessments could result in further restricting the future availability of minerals sites. Environment groups Welcome the inclusion of scope for a site to be restored to contribute toward beneficial outcomes for biodiversity. Government organisations Broadly supportive of the principles and the overall approach taken to choosing preferred sites. Mapping of each site should include each site in relation to local and nationally designated nature conservation sites. Supports the inclusion of impacts on the historic environment and heritage assets, landscape character and the built environment and townscape as factors to be considered through the site selection criteria. Other Authorities Should engage with neighbouring authorities to identify and assess any potential impacts. Community / private individuals Only as far as it can guide or direct – it cannot ensure a priority order. Consider the physical effect of development on surrounding properties and likelihood of having to meet claims for compensation for subsidence and damages to</p>	<p>Preferred approach The preferred approach is as set out in the issues and options consultation document, however the methodology has been amended to move the detailed assessments (where required) to be undertaken alongside preparation of the final plan as this was considered to be more reflective of the plan-preparation process/stages. Refer to the Site Assessment Methodology for further detail.</p>

	health.	
General comments	<p>Government organisations Need to consider Bedford to Milton Keynes Canal Extension. Concurs with the conclusion that there is no requirement for the plan to undergo assessment under habitats regulations.</p> <p>Other Authorities The Key Diagram shows a potential railway station on East-West Rail in the vicinity of Newton Longville, this is not part of the current proposal and needs to be removed from the diagram.</p> <p>Community / private individuals There is a need to ensure conditions are adhered to from the start of extraction to completion of restoration. There needs to be sufficient resource available to ensure it happens long term. Operators should be required to produce travel plans that require vehicles to seek to avoid travelling through key settlements.</p> <p>Currently gravel resources in Milton Keynes, Newport Pagnell, Wolverton, New Bradwell, Calverton and Passenham. It is felt strongly that these resources should be used first before extracting gravel from Ouse Valley between Lathbury and Cold Brayfield.</p> <p>Whilst recognising the need for Limestone, extraction close to established communities should be avoided if possible.</p>	