

Minerals Local Plan Publication (Regulation 19) version

Name	Representation	Part	Representation/Comment	Planning Authority Comment
Environment Agency		Whole Plan	We have no comment to make on this document. Our comments from past submission have been considered.	Noted
Highways England		Whole Plan	<p>1. Thank you for your email of 13 January 2016 to the Secretary of State for Transport inviting comments on the Minerals Local Plan: Final Draft Plan (Proposed Submission Version)</p> <p>2. Highways England is responsible for the operation, maintenance and improvement of the Strategic Road Network in England on behalf of the Secretary of the State. In Milton Keynes and the surrounding area, Highways England has responsibility for the M1, A5 and A421 (east of the M1). The M1 is defined as a route of strategic national importance. The A421 trunk road provides an important link between the A1 and M1 via Bedford, having benefited from a significant upgrade in 2011. A number of important junctions on the Highways England network are located within or close to Milton Keynes, including M1 Junctions 13 and 14.</p> <p>3. Highways England is a key delivery partner for sustainable development promoted through the plan-led system and as a statutory consultee we have a duty to cooperate with local authorities and other bodies to support the preparation and implementation of plans.</p> <p>4. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the Strategic Road Network and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.</p> <p>5. I have reviewed the Minerals Local Plan:Final Draft Plan (Proposed Submission Version) which replaces the adopted Mineral Local Plan 2006, setting out the policies and proposals against which future planning applications will be determined. Highways England has previously responded to Milton Keynes Council Minerals Local Plan: Issues and Options Consultation Paper September 2013.</p> <p>7 I note there are currently four sand and gravel sites that have the benefit of planning permission. Currently there are no operational</p>	Noted

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			<p>quarries in Milton Keynes. Highways England request it is notified by Milton Keynes Council when these sites become operational to enable it to assess impact on the Strategic Road Network.</p> <p>8. In conclusion, Highways England is broadly supportive of the Mineral Local Plan: Final Draft Plan (Proposed Submission Version)</p>	
Bedford Borough and Central Bedfordshire Council		Whole Plan	The plan does not raise any strategic issues that are of concerns to our two authorities.	Noted
Cllrs Geary, Hoskings and Mclean	Unsound and not legally compliant	Whole Plan	<p>In our view the minerals local plan was flawed very early on in the process and only meagre attempts have been put in place to address this.</p> <p>In earlier drafts we were surprised that very few sites had been entered. Having spoke to a number of local landowners they seemed unaware that the process was underway and when questioning officers it seemed they had only approached the industry hence the industries preferred sites were put forward, not necessarily the best sites. After a motion to cabinet by us ward councillors a revised call for sites was done. This entailed all landowners who had land which had minerals underneath it being written to. The amount of people who responded showed how flawed the first process had been. The additional sites were all refused however as they had no industry backing. This is not surprising as not time was given to approach the industry or to engender support or investigate the amount of minerals that may exist under the sites. If this work had been done at an earlier stage then this would have almost certainly been different.</p> <p>This plan therefore has not in any way undergone the rigorous approach that it should have done to identify the best sites, not just for minerals industry but also for the people of the city. There are better sites that are further away from houses, that will affect less people both during extraction and into the future and as a result should be brought forward first.</p> <p>The initial failings of the process have possibly lead to the plan not being legally compliant and the resulting proposals have led to it in our opinion not being sound as their are better sites the could have been selected.</p> <p>Changes need to make the plan sound.</p>	<p>The plan has been prepared fully in accordance with the regulations and has adopted the same process in relation to site selection through a call for sites process that has been found sound on numerous occasions elsewhere. It is important that the sites included in the plan are deliverable and the plan process for this particular plan should not be further sidetracked by trying to find sites elsewhere that could potentially be as deliverable as these sites.</p> <p>The additional call for sites that took place in early 2015 and was very targeted in concentrating on landowners in the river valleys did bring forward potential sites. However these were all landowner led. In general sites brought forward were large parcels of land that, whilst within the areas of focus (identified through BGS indicative mineral resource mapping) and likely to contain some mineral resources, were not supported by site specific information; for example total yield, annual extraction rate, resource quality/characteristics and operational life. In addition no industry interest or support was noted. These factors contribute</p>

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			<p>The process needs to be rolled back. Landowners who have entered sites need to be contacted and asked to promote their site properly, to gather the evidence that is needed so an objective comparison can be made of all the sites and giving landowners an opportunity to seek industry backing for their sites.</p>	<p>towards site deliverability. That they were not present in the submissions does not indicate that these sites are inappropriate but it illustrates that these potential sites are not robust enough to displace the existing allocations in the Draft Plan. It should also be noted that the spatial distribution of the sites brought forward also did not in many cases address the perceived over-concentration of sites with several sites being located in proximity to the Draft Plan allocations. Three sites located in a cluster along the west of the River Tove were put forward but as a new potential extraction area with no history of extraction and no supporting information submitted there was an uncertainty over these sites particularly when set against the Draft Plan allocations. In conclusion none of the eight sites brought forward through the additional call for sites round were therefore considered to be more appropriate for inclusion in the plan, or more deliverable, than those previously identified as proposed allocations within the Draft Plan. As such none of the listed sites were subject to further assessment or taken forward for consultation with the intention of being included in the Final Draft Plan.</p>
Dr D Crowe	Objection	Whole Plan	<p>We do not find the forms provided for consultation adequate: they do not allow for certain criticisms which need to be repeated at this stage (having been persistently ignored in previous stages of the Plan's preparation). So in addition to the forms you have provided, which we have completed below, there are the following points which we wish to be</p>	<p>The forms are the standard recommended forms.</p>

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			<p>clearly recorded.</p> <p>The preparation of the Plan has been unsatisfactory in several respects but mainly in the almost total disregard paid to the affected communities. Lathbury Parish Meeting produced a detailed analysis and set of improvements which were completely ignored by the Council Planning Officials. In short the consultation process has been a complete sham.</p> <p>This is further underlined by the Sustainability Appraisal document which in first draft was completely incoherent and remains now an inconsistent and rambling document that fails properly to address environmental factors or sustainability. This document is so poor that we intend to ensure that it receives careful scrutiny at the hearing.</p> <p>Finally we would offer the further comment that the Plan as a whole, when considered as a piece of written English, is of a very low standard. There are several sentences that simply do not read, and one or two paragraphs that just do not make sense. For a document of this importance to be released in such a state does not reflect well on Milton Keynes.</p>	<p>Potentially adverse impacts resulting from proposed allocations have been taken into account through the site assessment process, please refer to the Technical Annex. The scope of the assessments is set out in the methodology. It is important to note that the level of assessment (and scope of methodology) is proportionate to the plan-making process and so does not include more detailed assessments/works that would be expected to accompany a planning application.</p> <p>The SA has been prepared in accordance with regulatory requirements and national guidance. The format, scope and content of the SA reflects that of national guidance. No objections to the SA were received by Council from the statutory SEA consultation bodies.</p> <p>Whilst it is accepted that some typographical and grammatical errors do occur in drafting the Local Plan and all of the associated evidence documents, it would have been useful if the respondent had included a listing of such errors if indeed the standard of the document was of such low standard.</p>
Bedford Borough and Central Bedfordshire Council		2.34	<p>Para 2.34 notes that there is a low volume of C&D waste arising in Milton Keynes and, therefore, a limited amount of recycled aggregate. The EA Waste Interrogator reveals that approximately 54,000 tonnes of inert waste was exported from Milton Keynes to Bedford Borough and Central Bedfordshire in 2014, but this was nearly all soil to be used for land reclamation. We therefore have no reason to disagree with the assumption made, albeit there may be smaller amounts of hardcore, etc. arising from exempt sites, not included in the Waste Interrogator. Nevertheless, we are pleased to</p>	Noted

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Mrs R Chandler	Unsound - Justified	3.3	<p>note the provision for secondary recycling facilities in Policy 7, as arisings of C&D Waste may increase over time.</p> <p>I believe that the following has not been taken into account:- The proximity of listed buildings to the Lathbury Site. This is not consistent with 3.3 The close proximity of residential properties to the proposed Lathbury site. The boundary of The Thatched Barn is adjacent to the proposed site. Field Gate Flowers is a British flower farmer serving the community of Milton Keynes – employing local people. This business will be affected by proposed extraction at the Lathbury site Suggested Change I understand the need for mineral extraction. My concern is two sites in Lathbury. This impact on the community would be significantly reduced. The Quarry Farm Site is further from the residential area of Lathbury and the listed properties.</p>	<p>The proximity of listed buidlings and residential properties has been taken into account through the site assessment process, please refer to the Technical Annex. In addition the proximity of Field Gate Flowers has also been taken into account through the site assessments (compatibility of surrounding land uses – low/medium sensitivity refers to such landuse).</p> <p>The site assessments address potentially adverse impacts and include an overview of standard avoidance and/or mitigations measures and the level to which such measures would reduce the identified impacts.</p> <p>The scope of the assessments is set out in the methodology. It is important to note that the level of assessment (and scope of methodology) is proportionate to the plan-making process and so does not include more detailed assessments/works that would be expected to accompany a planning application.</p>
Wildlife Trust	Unsound – Consistent with national policy	Objective 6	<p>Page 21 Section 3 Minerals Local Plan Strategic Objectives: number 6.</p> <p>As stated in our response in 2014, the remit of this objective still needs to be amended to ensure protection of a wider range of ecological assets (e.g including Local Wildlife Sites, priority habitats and priority species) and enhancement of Milton Keynes natural environment, without restriction to just national and international designations.</p> <p>At present the objectives are not consistent with the NPPF paragraphs 109, 113, 114, 117, 118.</p> <p>Suggested Change</p>	<p>As previously explained in relation to the Draft Plan consultation response received from the Wildlife Trust the remit of the objective includes ecological assets such as Local Wildlife Sites, priority habitats and priority species through the following reference which is at a level commensurate with their status as per NPPF paragraph 113. "... ensure that permitted operations do not have unacceptable adverse impacts on the</p>

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			<p>The change we consider necessary is as follows: It is hard to suggest wording since the objective also includes heritage and human health which are outside of our remit to comment on. With respect to the natural environment we would suggest wording for Objective 6 as follows: “Protect and enhance Milton Keynes’ key ecological assets and enhance the biodiversity of the wider environment.” This change will make the plan sound in this respect as it would then be consistent with paragraphs 109, 113, 114, 117, 118 of the NPPF.</p>	<p>natural and historic environment or human health by avoiding and / or minimising adverse effects to acceptable levels.” The objectives should be viewed as setting the scene with the policy detailing local requirements – for example Policy 9 expands on Objective 6 by requiring “Minerals related development should contribute to and enhance natural assets and resources, including a net gain in biodiversity. This is achievable through: Protecting environmental designated sites of national and international importance, <u>Enhancing the natural environment and recognise wider ecological networks, particularly regarding local environmental designations</u>, and Contributing towards the Buckinghamshire and Milton Keynes Biodiversity Action Plan targets.” An objective that sought the protection and enhancement of all aspects of ecological networks (ie all levels of designation receiving the same level of protection) would not be practicable or sound and would not be in line with the NPPF. The approach taken through the plan is fully compliant with the NPPF. Simply listing NPPF paragraphs is not useful, where there are real issues with a planning document it would be more effective to identify actual deficiencies or areas of non-compliance and link these to specific sections of the NPPF or other evidence documents (rather than a blanket reference to every paragraph referring to nature</p>

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				conservation/biodiversity/ecological networks and local plan policies).
Dr D Crowe	Unsound – Justified, effective, consistent with national policy	Objective 6 and 7	Objectives 6 and 7 are laudable, but are not addressed again in the plan. In order to be consistent the plan needs to strengthen considerably its commitment to minimize adverse impacts – see later. Suggested change See full criticism supplied in original consultation which can be viewed on MK Council website at http://miltonkeynes-consult.objective.co.uk/common/search/advanced_search.jsp?id=810610&lookingFor=representations&tab=list (It is in page 3 of the list)	Objectives 6 and 7 are taken forward through the plan through policies 5 to 16. The Local Plan policies will be applied, in addition to national policy/guidance, to determine planning applications for minerals-related development.
Buckinghamshire County Council		4.6	The level of provision is solely derived from the average of the last 3 years sales. Although there is insufficient data to develop a 10 year trend, a trend could be developed using those years for which data is available. It is acknowledged that Milton Keynes does not have a minerals industry in which aggregates sales occur every year, and that aggregates extraction is sometimes absent. However, the Local Aggregate Assessment shows that sand and gravel sales have taken place between 2006 and 2012, and an average of those years would be more accurate. Sales of sand and gravel aggregate are also taken place into Buckinghamshire, and this should be acknowledged within the Plan. Demand for sand and gravel aggregates is likely to rise within the northern area of Buckinghamshire as housing growth is expected to rise substantially in the next 20-25 years.	It is considered that the three year period gave a provision level that was appropriate over the plan period assuming sites came forward and at 0.17 mtpa was more realistic than a 10 year based figure of 0.12 mtpa. It should also be noted that the six year provision figure of 2006 to 2012 suggested by the respondent gives a lower figure than in the plan (0.15 mtpa). The provision figure in the Plan needs to reflect demand for sand and gravel but also that this can fluctuate over a fifteen year plus plan period and that is why the Council considers 0.17 mtpa to be an appropriate figure. This figure is acknowledged as being appropriate by the South East Aggregates Working Party and which includes Buckinghamshire County Council. Rather than trying to get nearby areas to serve its county, Buckinghamshire County Council should through its own plan seek to better balance mineral extraction in its own area by promoting the extraction of mineral resources in the north of its area rather than concentrating production in

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				the far south of the county.
Buckingham shire County Council		Policy 1	<p><i>Sand and gravel resources are recognised as being of national importance. In order to ensure a steady and adequate supply of sand and gravel the plan will seek to secure provision of 0.17 million tonnes per annum. This will be delivered through existing commitments and new sites (including allocated and unallocated sites where in compliance with relevant local plan policies). The plan will seek to maintain a landbank of at least seven years for sand and gravel.</i></p> <p>This is not sufficiently positive. ‘Seek to secure’ and ‘seek to maintain’ are not directly providing. A more positive alternative wording would be: <i>In order to ensure a steady and adequate supply of sand and gravel the plan will maintain a landbank of sand and gravel of at least seven years for sand and gravel, and secure provision of 0.17 million tonnes per annum. This will be delivered through existing commitments and new sites (including allocated and unallocated sites which comply with relevant local plan policies).</i></p>	That is because maintaining a landbank is dependent on applications coming forward and being granted. The Council cannot magic up landbanks through permissions if applications are not made and so it “seeks to secure/maintain” rather than “will/secure”.
Bedford Borough and Central Bedfordshire Council		Policy 1	We are pleased to note, and support, the Plan’s approach to the supply of sand and gravel and the intention to maintain a 7-year landbank of reserves.	Noted
Lathbury Parish Meeting	Unsound – Justified, effective, consistent with national policy	Policy 1	Policy 1 states that “the plan will seek to secure provision of 0.17 million tonnes per annum.” The Draft MLP relies on government guidance on the managed aggregates supply system, which “states that {Minerals Planning Authorities} should....look at the average three year sales identify the general trends of demand and whether it may be appropriate to increase supply” (§4.5, p. 22). The new Planning practice Guidance (PPG) superseded this guidance in March 2014. The new guidance does not refer to three-year average sales. It states that a Local Aggregate Assessment should contain: “a forecast of the demand for aggregates based on both the rolling average of 10-years sales data and other relevant local information”. The Local Aggregates Assessment Draft Plan Stage (July 2014) (LAA) 2 argues that the first three years of the 10-years sales data skews the average, since there were no operational quarries during this time (§2.10, p 7). This accepted. However, it is not clear why the	Forecasting of demand including consideration of the 3 and 10 year averages is set out through the Local Aggregates Assessment– the approach is consistent with current Government guidance on the Managed Aggregate Supply System (MASS) states that MPAs should also look at the average three year sales to identify whether it may be appropriate to increase supply. Local Aggregate Assessments must also consider other relevant local information in addition to the 10 year rolling supply, which seeks to look ahead at possible future demand, rather than rely solely on

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			<p>MLP bases the proposed provision in Policy 1 on the most recent three years, other than a reliance on now out-of-date government guidance. The 10-years sales data contain seven years in which there were sand and gravel sales, and the figure in Policy 1 should be the average of these seven years. On basis of information provided in the LAA we estimate this to be approximately 0.15 million tonnes per annum, which is significantly lower than the figure of 0.17 million tonnes assumed in the Draft MLP.</p> <p>Further information included in the LPM response to the Draft Plan Consultation of August 2014 – Submitted November 2014.</p> <p>Proposed amendment</p> <p>The apportionment rate in Policy 1 should be the average sales of all the years over the past 10 in which there were any sales.</p>	<p>past sales. Such information may include, for example, levels of planned construction and house building in their area and throughout the country. Mineral Planning Authorities should also look at average sales over the last three years in particular to identify the general trend of demand as part of the consideration of whether it might be appropriate to increase supply.</p> <p>At Issues and options stage four options were presented ranging from 0.11 mtpa to 0.28 mtpa. The option chosen of 0.17 mtpa was considered to provide a realistic representation of average sales as it takes account of a time when sales peaked (in 2010) and also a period when sales declined (between 2011 and 2012) but also recognised the peak in 2010 was also reached in 2009 so the figure was not artificially inflated by a one off spike in sales. As well as this occurring during a recession there was also no period when sales were artificially depressed due to the lack of available sites, such as when Passenham/Calverton was closed and sold in 2013.</p>
Ms A Cavanagh	Unsound – Justified, effective	Para 4.13	<p>There were numerous additional sites proposed within the primary areas that were not properly considered during the consultation period, that would not require any additional secondary sites eg Lavendon Mill and most importantly had these been considered there would therefore be no need for any mineral extraction near any residential housing eg Lavendon Mill where properties are within 200 m of the proposed site</p>	<p>All sites put forward throughout the plan-making process have been assessed as per the site assessment process. The appropriateness of the sites to be taken forward as proposed allocations through the plan has been determined on a merits basis and is documented in the consultation papers, Technical Annex as well as in the briefs and reports prepared for council and as part of the consultation</p>

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				<p>process. It is acknowledged that some of the proposed allocations are within the secondary area of focus. This is because overall these sites were considered more appropriate than other sites (within primary focus areas) and were in general compliance with the emerging spatial strategy. Not all sites need to be allocated from the primary area of focus. Sites that present higher risk of potentially adverse impacts or that are not deliverable should not be allocated over other sites simply because they are within the primary area. The council cannot force sites to come forward and must take those brought forward into consideration and assess them on a merits basis (according to the methodology to allow for consistency and transparency). In addition the Council has not sought to identify a number of sites purely to satisfy the total required provision – it has only taken forward those it considers deliverable and appropriate. Proximity to residential dwellings does not in itself determine if a site is appropriate to take forward as a proposed allocation. With reference to Lavendon Mill there are no residential dwellings within 250m of the site boundary – given the distance and sensitivity level of the land use (medium) this is acceptable. This is reflected in the site assessment, refer technical annex.</p>
Berkeley Strategic Land Limited		Policy 2	Policy 2 identifies preferred areas for extraction of sand and gravel resources within Milton Keynes, including the area of river deposits located along the “River Ouzel south of Newport Pagnell”. This is reflected in the Key Diagram shown at Figure 5 of the Proposed Submission Minerals Local Plan (areas shaded yellow indicated as	<p>The spatial strategy is based upon where mineral resources are located in the Borough. The MSAs are based on the BGS data that incorporated the 1:10,000k maps and</p>

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			<p>“Primary focus area”).</p> <p>A WSP survey and further assessment work by Alliance Planning on behalf of Berkeley, confirms that beyond the permitted extraction activities at Caldecote Farm, the remaining land in this location to the south and east contains limited potential sand and gravel resources and that these are subject to a level of constraint. In particular, the deposit is limited in extent and thickness and is overlain by soils and overburden (head deposits) that limited the potentially viable resource. IN addition, the deposit becomes excessively clayey and silty towards the River Ouzel rendering the deposit unsuitable for aggregate use. It is assessed that these factors render the deposits in this location unviable for extraction. The presence of the floodplain also increases the risk and cost of extraction arising from seasonal floods.</p> <p>For these reasons, we consider that Policy 2 is not justified and therefore unsound in respect of indentifying land along the River Ouzel south of Newport Pagnell as a primary area of focus for sand and gravel resources. This location should be deleted from Policy 2 as a primary focus area.</p> <p>In addition, we note the supporting text to Policy 2 at para 4.15 states:</p> <p>“It is important that the inclusion of areas within the spatial strategy does not imply grant of planning permission. Site specific proposals for mineral extraction will need to comply with the spatial strategy but will also be subject to assessment through the planning application process and need to be in compliance with other relevant local plan policies.”</p> <p>We consider that this is an important clarification that should be embodied within the wording of Policy 2 itself rather than just the supporting text to make clear that extraction proposals will need to be assessed in the round against the spatial strategy and alongside other relevant local plan policies.</p> <p>Proposed amendment</p> <p>We therefore request amendment to both the primary area of focus for sand and gravel and Minerals Safeguarding Areas to exclude land along the River Ouzel south of Newport Pagnell on the basis of the limited and poor quality reserves that exist in this location and with</p>	<p>any other relevant information such as borehole data. The Mineral Resource Information in Support of National, Regional and Local Planning: Buckinghamshire and Milton Keynes was produced by BGS in 2003, since this date further studies have been undertaken: BGS 2010 Sand and gravel resources of Milton Keynes Borough; BGS 2007 Aggregate supply and demand for sustainable communities; and refining of the limestone formation in 2012. Information gathered from these studies was incorporated into the updated Mineral Resources Map 2012; this map has been used as the base for identifying the geographical distribution of ‘known’ mineral resources in Milton Keynes. It is accepted that within the MSAs there may be locations where extraction may not currently be economically viable but the plan is not going to tinker with the generality of the MSAs where some work has been undertaken that may prove that this is the case. This information needs to come into play if applicants seek at planning application stage to sterilise resources identified in an MSA through non-mineral development. It is not necessary to include the text at paragraph 4.15 within Policy 2.</p>

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			revisions to the wording of both Policy 2 and 18.	
Lathbury Parish Meeting	Unsound – Justified, Effective	Policy 2	<p>Paragraphs 4.12-4.13 in the draft MLP provide estimates for the inferred aggregate resource in the primary and secondary areas defined in the spatial strategy. Excluding previous mineral extraction sites, the primary areas are estimated to contain 20 Mt, of which 17.4 Mt is over the minimum threshold for economic viability. The secondary areas are estimated to contain 60 Mt, most of which is over the minimum threshold for economic viability.</p> <p>The sites for sand and gravel extraction within the Milton Keynes administrative area that have been subject to site assessments and which are detailed in at least one of the two site assessments documents attached to the draft MLP, together with the estimated yield from each. Thus the sites that were assessed and where resource have been quantified cover approximately 4% of the total estimated resource in the primary and secondary areas.</p> <p>This raises questions about the rigour of the process of site identification. The Methodology for the Assessment of Minerals-Related Development Sites attached to the Draft MLP states that there was “a call-for-sites” allowing landowners, industry and other stakeholders to state their interest in developing a specific site for minerals-related development during the plan period.” (§1.10). However, we can find no information in the plan and attached documents to indicate how the call for sites was conducted. The call was issued on notepaper belonging to the consultants for the Draft MLP, Northamptonshire County Council. It is possible that it was dismissed as irrelevant by some recipients.</p> <p>Before adopting the draft plan, the Council should demonstrate that opportunities to identify site have not been missed, particularly where there may be sites that provide a better balance between economic benefits and adverse environmental impacts than is the case for the sites included in the Draft MLP. We note further that the secondary areas identified in the Draft MLP are bounded to the north by the Northamptonshire County Council administrative area. It is a matter of concern that this may have given rise to a conflict of interest for the consultants, and we seek reassurances that the Council has satisfied itself that any such conflict of interest was appropriately managed</p>	<p>The inferred resource is very much the maximum that there could be and it also assumes no constraints. The plan has been prepared fully in accordance with the regulations and has adopted the same process in relation to site selection through a call for sites process that has been found sound on numerous occasions elsewhere. It is important that the sites included in the plan are deliverable.</p> <p>The additional call for sites that took place in early 2015 and was very targeted in concentrating on landowners in the river valleys did bring forward potential sites. However these were all landowner led. In general sites brought forward were large parcels of land that, whilst within the areas of focus (identified through BGS indicative mineral resource mapping) and likely to contain some mineral resources were not supported by site specific information; for example total yield, annual extraction rate, resource quality/characteristics and operational life. In addition no industry interest or support was noted. These factors contribute towards site deliverability. That they were not present in the submissions does not indicate that these sites are inappropriate but it illustrates that these potential sites are not robust enough to displace the existing allocations in the Draft Plan. It should also be noted that the spatial distribution of the sites brought forward</p>

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			<p>during the development of the draft MLP. Further information included in the LPM response to the Draft Plan Consultation of August 2013 – submitted November 2014.</p> <p>Proposed Amendment</p> <p>The Council should show that the call for sites was sufficiently thorough to ensure that all potential sites in the primary and secondary areas were identified.</p> <p>The Council should demonstrate that any conflict of interest between the consultants and the Council did not affect the content of the Draft MLP.</p>	<p>also did not in many cases address the perceived over-concentration of sites with several sites being located in proximity to the Draft Plan allocations. Three sites located in a cluster along the west of the River Tove were put forward but as a new potential extraction area with no history of extraction and with no supporting information submitted there was an uncertainty over these sites particularly when set against the Draft Plan allocations. In conclusion none of the eight sites brought forward through the additional call for sites round were therefore considered to be more appropriate for inclusion in the plan, or more deliverable, than those previously identified as proposed allocations within the Draft Plan. As such none of the listed sites were subject to further assessment or taken forward for consultation with the intention of being included in the Final Draft Plan.</p> <p>If the MK consultants were to have addressed the plan preparation process from a Northamptonshire-centred perspective then surely it would have been the case that they would not have identified the Calverton/Passenham site which is in close proximity to the settlement of Passenham. Also it could be assumed that a conflicted consultant would identify the area to the north as a primary rather than secondary area of focus in the hope that sites closer to Northamptonshire but not in it could serve Northamptonshire markets without</p>

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				allocations being needed in their patch. However this was not the case and as such it is self evident that services provided were objective with decision making led by evidence.
J Adams		Policy 2 +3	<p>The site A1 Calverton/Passenham is not founded on a robust and credible evidence base because there is no evidence of proper participation of the local community. The immediately adjacent village of Passenham was not consulted and Old Stratford Parish Council had its presentation of the Plan by Mr Bob Wilson on the day before the consultation period ended.</p> <p>Referring to Policy 3 the location is misleading by the fact that the A1 Calverton/Passenham site is not south of Wolverton but to the east four miles away and adjacent to the county of Northamptonshire.</p> <p>Proposed amendment</p> <p>The proposed site A1 should be removed from the M.K Minerals Plan because Policy 10 has not been conformed to.</p>	<p>Having a robust and credible evidence base relates to national policy and guidance and technical assessments that prove the allocation is appropriate for mineral extraction- it does not relate to consultation. However Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January 2016 about consultations on the Milton Keynes Council Minerals Plan.</p> <p>The allocation is south of Wolverton. South was chosen as opposed to east or south east, as it ties in with the use of north and south elsewhere in the policy. (Policy 10 reference). Factors such as potentially adverse impacts on the historic and natural environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not</p>

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				exceed acceptable limits.
Buckingham shire County Council		Policy 3	<i>Proposals for the extraction of sand and gravel at the following sites will be permitted in accordance with other relevant local plan policies: It would be more positive for this policy to be worded: 'will be permitted where they are in accordance with other relevant local plan policies.'</i>	The suggested amendment would not affect the policy intent or increase its contribution towards positive planning, rather it is a point of minutia.
R Tolley	Objection	Policy 3	<p>I wish to register my objection to the proposal contained in the Minerals Local Plan to extend the existing quarry at Calverton. I do not believe enough weight has been given to the fact that sand and gravel extraction from this site will be so close to this manorial village. The village itself and many of the surrounding fields are included in a Conservation Area. The Church is Grade I listed and there are also other Grade I and Grade II listed buildings. With any increased gravel extraction from the Calverton Quarry this will obviously have a significant impact on this small hamlet since the extraction will come within 20 metres of Passenham Lane and unacceptably close to several houses including Grade II listed buildings.</p> <p>The impact of gravel extraction is highlighted in the recent Conservation Area and Management Plan adopted in January 2016 by South Northants Council where it states: "The surrounding landscape also has an impact on the setting of the conservation area....Increased gravel and sand extraction has taken place along the Ouse valley and is evident in the surrounding landscape....This has impacted some views out of the conservation area with modern intervention evident from the historic settlement. Large scale permanent alterations and modern interventions and modern intervention to the surrounding landscape can have a detrimental effect on the setting of a rural hamlet such as Passenham".</p> <p>Additionally the extraction of sand and gravel is a very noisy, dirty and dusty process. Dust carried on the prevailing winds will inevitably impact on the people and properties in the village. Gravel extraction has been continuously affecting this small village for the past twenty two years and if the inclusion of additional extraction at the Calverton quarry is allowed will go on for many more years. This is just not</p>	<p>Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits.</p> <p>As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated.</p>

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			<p>reasonable. Passenham residents feel our views are consistently ignored by the Local Authorities involved since this ancient manorial hamlet is also affected by Northamptonshire County Council's Minerals Waste and Local Plan.</p> <p>I ask the Secretary of State to remove the extension to the Calverton quarry from the Milton Keynes Minerals Local Plan.</p>	
L Ritson	Objection	Policy 3	<p>I wish to register my objection to the proposed inclusion in the above plan of an extension to the approved quarry at Calverton. Although the hamlet of Passenham is extremely close to the proposed extension (at its closest point it is about 20 metres from Passenham Lane, about 100 metres from Passenham Mill and about 150 metres from the Grade Two listed Dovecote), at no time have the residents been included in the planning and the consultation process. Indeed, I understand that public meetings to explain the Final Draft of the Local Plan have been arranged and are now taking place at Lathbury, Lavendon, Sherington and at Weston Underwood, but no such arrangements had been made for the residents of Passenham until the matters was raised by our Parish Council, and a public meeting is now to take place on 8th March.</p> <p>Taking account of the impact that extraction on this site would have on the residents of Passenham, this lack of consultation throughout the lengthy planning process and at this final stage is inexcusable. This complete lack of involvement in the consultative process means that the submission of the Final Draft of the Local Plan to the Secretary of State is the only opportunity that Passenham residents have to raise their objections to the proposed extension to the Calverton Quarry. In sending this email to the Milton Keynes Council (as requested on the Council's website), I trust that this and all other objections will be forwarded by you to the Secretary of State. If this is not so, please let me know and provide me with the correct procedure of making known my objection to the Secretary of State.</p> <p>My objection is twofold:</p> <p>First is the close proximity of the proposed extension to the hamlet of Passenham. This new extension brings the quarry closer than ever before to the hamlet. Extraction of sand and gravel and the subsequent refilling is a noisy, dusty and intrusive business. A visit to any site currently being worked will confirm this. When a site is being</p>	<p>Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January 2016 about the consultation on the Milton Keynes Council Minerals Plan. Indeed you were actually specifically contacted on 21 April 2015 to confirm that the Parish Council was formally contacted by e-mail to the clerk on 29 October 2013 and again on 13 August 2014 with information about the consultation period and where documents were available to view.</p> <p>The publication (proposed submission) stage of the planning process is when the plan that the council wishes to adopt is publicised and on which formal representations can be made. It is therefore the case that public drop-in sessions are not normally held at this stage as the proposals are not up for discussion as it will be the role of the examination and the public hearing sessions to do this - the only real role of a public meeting at this stage would be to inform residents how to make representations. Although it is not the norm (and note that such meetings are not held in Northamptonshire for example) some public meetings were carried out in Milton Keynes at the request of Councillors and Parish Councils and one</p>

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	Unsound and Not legally compliant - Justified		<p>considered for extraction, the environmental impact on nearby residents need to be taken into account and weighed against the commercial and financial interest of the operator. I have no evidence that this has been undertaken in this case but if it has, then there has been a serious misjudgement with regard to the impact that extraction for eight hours a day for five days every week would have on the residents of nearby properties.</p> <p>My second objection relates to the method of processing the extracted material. The sand and gravel that is extracted from the existing approved site, is loaded onto lorries and transported across the flood plain for almost a mile, crossing into Northamptonshire where it is processed at a site close to the A422. When the site is backfilled, the lorries will make a reserve journey. This journey is via a temporary road and the noise and dust from the vehicles is a constant intrusion on Passenham. To continue this intrusion into the future by proposing an extension to the existing site is clear evidence that consideration of the effects of extraction on local residents, who have already endured 22 years of gravel extraction, has been ignored. Indeed, if permission for extraction were to be granted, it is likely that the hamlet would have been exposed to extraction for at least 30 years.</p> <p>I ask that the Secretary of State delete the proposed extension of the quarry at Calverton from the Milton Keynes Minerals Local Plan – Final Draft.</p> <p><i>Additional response received:</i></p> <p>The Minerals Local Plan has not met the requirements of the process of community involvement required for Legal Compliance nor has it met the requirements of the Justified Soundness to produce the evidence of participation of the local community at the time of the preparation of the Plan.</p> <p>The hamlet of Passenham lies close to the proposed extension to the Calverton Quarry indeed the proposed workings would be about 100 metres from Passenham Mill and several other properties and about 150 metres from the listed Dovecote. However none of the residents was consulted during the preparation of the Plan and the proposal to extend the quarry was discovered by accident well after the consultation process by MKC has been completed.</p>	<p>was held at Old Stratford on 8 March 2016, albeit close to end of the period for representations.</p> <p>Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits.</p> <p>As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated.</p>

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			<p>This means that residents were unable to influence the content of the Minerals Local Plan for it was a fait accompli. During the first week of this month (March 2016) at the request of Passenham residents, MKC held a public meeting during which it was explained that our views would only be considered by the Secretary of State on the specific grounds of Legal Compliance and/or Soundness. This precludes residents raising their objections on environmental or other grounds.</p> <p>Therefore the Plan has not met the requirements of Soundness and Legal Compliance.</p> <p>Proposed Amendment</p> <p>The proposal to extend the workings at the Calverton Quarry should be deleted from the plan.</p> <p>Should MKC decide it wishes to include this in a future update of its Minerals Local Plan, it should undertake full and comprehensive consultations with Passenham residents before the updated Plan is prepared.</p>	
D Ritson	Objection Unsound - Justified	Policy 3	<p>I wish to register my objection to the proposal contained in the above Plan to extend the existing quarry at Calverton. I presume my objection will be forward by you to the Secretary of State for consideration.</p> <p>It is my view that this proposal is not related to need but has been chosen because it is, for MKC, a convenient way of meeting its mineral extraction targets. As far as MKC is concerned, this site brings no vehicular traffic onto the Beachampton Road, no Milton Keynes residents are affected and the excavated material is not processed in MKC but across the county boundary into Northamptonshire.</p> <p>This convenience for MKC conflicts sharply with the impact that extraction would have on the lives of the residents of Passenham. At its closest point, the proposed extraction would be about 20 metres from Passenham Lane, about 100 metres from Passenham Mill and about 150 metres from the grade two listed Dovecote. All material extracted at this location would then be transported in lorries for a mile across the flood plain in sight and sound of the houses in Passenham. The material is then processed at a site close to the A422.</p>	<p>Need is demonstrated in the plan in that sites located within the Borough boundary are needed to meet the annual provision set out in the plan. It should be noted that this is an extension to existing operations within Milton Keynes Borough.</p> <p>Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any</p>

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			<p>Naturally, Passenham residents have no knowledge of any financial arrangement between MKC and GRS Roadstone, which is the company that would be processing and exporting the sand and gravel taken from the Calverton Quarry.</p> <p>The Minerals Plan was prepared by MKC without any consultation with or involvement by the residents of Passenham. Indeed it was only by chance and at a late date that the proposal was discovered. In consequence our only opportunity to present our comments and/or objections is at this late stage when the Draft Final Plan is to be sent to the Secretary of State.</p> <p>For residents of Passenham, it is important that the Secretary of State should not view this proposal in isolation. This is because, for the past twenty two years the lives of Passenham residents have been subject to nearby mineral extraction and our property values blighted. This proposal by MKC would add to the plight of residents. To understand the situation at Passenham is it necessary to review the history of extraction here. This provides sound evidence of the conflict of interest between the residents and the extraction companies and demonstrates how the views and feelings of residents have been consistently ignored by the extraction companies and by the local authority, Northamptonshire County Council.</p> <p>Following a Public Inquiry held in 1991, permission for extraction was granted in 1993 and since that date the extractive companies have consistently failed to proceed regularly and diligently with extraction, contrary to the intentions of the Planning Inspector in his Appeal Decision. During that Appeal, the applicants were quoted as saying – “The site would be expeditiously restored in order to minimise any disturbance to the area” (Para 5.30-4)</p> <p>“The period of working would be relatively short with minimal impact on Passenham” (Para 5.79)</p> <p>In light of these and similar statements, the Inspector’s Report concluded (Para 10.5 in Appendix 2.1) that the extraction activities would have a limited life and this provided justification for his decision to approve the application.</p> <p>However, not only did extraction proceed in a series of fits and starts, but the area of extraction was extended across the local authority boundary to enable MKC to open a quarry at Calverton.</p>	<p>planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits.</p> <p>Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January 2016 about the consultation on the Milton Keynes Council Minerals Plan.</p> <p>The publication (proposed submission) stage of the planning process is when the plan that the council wishes to adopt is publicised and on which formal representations can be made. It is therefore the case that public drop-in sessions are not normally held at this stage as the proposals are not up for discussion as it will be the role of the examination and the public hearing sessions to do this - the only real role of a public meeting at this stage would be to inform residents how to make representations. Although it is not the norm (and note that such meetings are not held in Northamptonshire for example) some public meetings were carried out in Milton Keynes at the request of Councillors and Parish Councils and one was held at Old Stratford on 8 March 2016, albeit close to end of the period for representations.</p> <p>As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated.</p>

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			<p>Understandably, local residents were aggrieved by the actions of NCC in approving this. They felt powerless in the face of the decision of extraction company, MKC and NCC.</p> <p>Past performance relating to the adherence to planning conditions and programmes should be a major consideration by local authorities in the preparation of their Minerals Plans. In his decision, the Inspector decided that work in Passenham should start within five years and be completed within three years of the start date. Twenty two years have now elapsed since that decision so you will understand that residents are not assured by statements by MKC of the need for minerals nor by statements regarding the planned duration of mineral workings.</p> <p>The current situation is that residents have not been able to have peaceful enjoyment of their properties for the past twenty two years. Additional extraction at the Calverton quarry would bring noise and dust extremely close to the houses of Passenham, in some cases within an easy stone's throw. Extraction and subsequent refill would take place for eight hours a day every week using noisy machinery, for this is a noisy, dusty and intrusive industry.</p> <p>Enough is enough There is no real evidence of demand and experience has shown that any programme for the extraction and refill is most unlikely to be adhered to. If approved, with extraction commencing in 2017, it is probable that there will have been mineral extraction around Passenham for thirty years.</p> <p>Enough is enough.</p> <p>It is clear, in this case, the environmental concerns of residents must take precedence over commercial interest regarding mineral extraction in this location. I ask the Secretary of State to remove the extension of Calverton from the Milton Keynes Minerals Local Plan.</p> <p><i>Additional response received:</i></p> <p>The Minerals Local Plan has not met the requirements of the process of community involvement required for Legal Compliance nor has it met the requirements of the Justified Soundness to produce the evidence of participation of the local community at the time of the preparation of the Plan.</p> <p>The hamlet of Passenham lies close to the proposed extension to the Calverton Quarry indeed the proposed workings would be about 100</p>	

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			<p>metres from Passenham Mill and several other properties and about 150 metres from the listed Dovecote. However none of the residents was consulted during the preparation of the Plan and the proposal to extend the quarry was discovered by accident well after the consultation process by MKC has been completed.</p> <p>This means that residents were unable to influence the content of the Minerals Local Plan for it was a fait accompli. During the first week of this month (March 2016) at the request of Passenham residents, MKC held a public meeting during which it was explained that our views would only be considered by the Secretary of State on the specific grounds of Legal Compliance and/or Soundness. This precludes residents raising their objections on environmental or other grounds.</p> <p>Therefore the Plan has not met the requirements of Soundness and Legal Compliance.</p> <p>Proposed Amendment</p> <p>The proposal to extend the workings at the Calverton Quarry should be deleted from the plan.</p> <p>Should MKC decide it wishes to include this in a future update of its Minerals Local Plan, it should undertake full and comprehensive consultations with Passenham residents before the updated Plan is prepared.</p>	
L Fincham		Policy 3	<p>I have been made aware of your plans by Turvey Parish Council and I am emailing to support their letter of objection on the same grounds regarding noise pollution, unsuitability of road for such heavy traffic (signs for the M1 were changed only 18 months ago as the road was deemed unsuitable for such traffic) and potential harmful effects of such traffic on the old stone buildings along the High Street, many of which are residential.</p> <p>I am also concerned that as a resident of Turvey, I have not had a written notification of your proposals considering the huge impact it will have on the village.</p> <p>In addition to my previous email, I wondered if you could advise as to whether a risk assessment has been completed regarding large, heavy-load lorries going along the High St which is a high percentage of areas have very narrow pedestrian pathways. This could prove to be significant health and safety issues for pedestrians.</p>	<p>The A428 running through the village is a primary route on the strategic road network, albeit that the route is no longer taking the long distance strategic traffic compared to the days when it was the main route from Birmingham to Cambridge/East Anglia.</p> <p>Olney is also on a strategic route and as a consequence traffic will not be routed to avoid it. Turvey would only be used as a traffic route if the destination of excavated material was to be to the markets of Bedfordshire.</p>

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Turvey Parish Council		Policy 3	<p>Turvey Parish Council has grave concerns about the suitability of the proposed access route to this site.</p> <p>Turvey is a village steeped in history, which has seen very little development over hundreds of years. It has a staggering 68 listed buildings, including some Grade One listed buildings. This represents 13% of the buildings of the village, which is an unusually high proportion. As such the vast majority of the village is designated as a conservation area, with main of these important historic buildings sited directly on the main road.</p> <p>Because it is so old and under developed, the main thoroughfare through the village is narrow. There is a well documented problem with parking in Turvey – again due to the historic nature of the settlement. Therefore may cars have to park on the narrow High Street. It is highly likely any large vehicles wishing to negotiate a route through Turvey will have regular problems.</p> <p>Additionally, the footpaths alongside the road are particularly narrow in places, again because of the age of the village. The properties on the High Street are predominantly residential dwellings, most of which do not have front gardens. The frontages of these historic residential dwellings therefore sit very close to the road. Having large vehicles pass so close to these homes would have a serious detrimental effect of the amenity and health of the families living in these properties, as well as the risk of damage to these vulnerable old buildings.</p> <p>There is a pre school of the High Street for under 5's. They have an open play area at the front, which would be in very close proximity to the large vehicles passing by.</p> <p>Turvey bridge is an ancient structure built in the 12th century and the last major repairs were in the 1820's. If you intend to take extensive numbers of large vehicles over this structure this would need a robust structural survey.</p> <p>Bedford Mayor Dave Hodgson was instrumental in getting the M1 signage changed locally in order to ensure no motorway traffic is routed through Turvey, as it was considered an unsuitable route for heavy traffic. This was about 18 months ago. Your proposed route completely contradicts this, and instead of reducing heavy traffic through Turvey it increases it.</p>	<p>The A428 running through the village is a primary route on the strategic road network, albeit that the route is no longer taking the long distance strategic traffic compared to the days when it was the main route from Birmingham to Cambridge/East Anglia.</p> <p>Olney is also on a strategic route and as a consequence traffic will not be routed to avoid it. Turvey would only be used as a traffic route if the destination of excavated material was to be to the markets of Bedfordshire.</p>

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			<p>Due to its close proximity to the River Ouse, Turvey is prone to flooding, which would impede the proposed access route for these vehicles.</p> <p>The hamlet of Station End is just outside the main settlement of Turvey, and is dominated by a retirement facility for elderly residents. There is a narrow footpath along the A428 between Station End and the main settlement of Turvey, but in some places there is no footpath at all. Therefore pedestrians (many of whom are frail) walking into the main village would have these large vehicles passing them in very close proximity. This hamlet is due to expand significantly, meaning there will be even more pedestrians attempting to walk into the main village.</p> <p>In summary, the route you are proposing is much longer than necessary in order to avoid going through Olney. Turvey's High Street is older unlike Olney, it is predominantly dominated by residential dwellings – not shops. The conservation area in Turvey takes up the majority of the village, unlike in Olney.</p> <p>This diverted route creates a far greater impact on members of the public, costs more in fuel, and presents greater harm to the environment. The distance from the proposed site in Lavendon to the Chicheley roundabout is a distance of 6 miles. The route to the Bromham roundabout via Turvey is 14 miles. Taking 30 truck trips per day, this adds an additionally 240 miles per day. If we assume a quarry life of 7 years and trucks operating 5 days a week 50 weeks per year this results in an additionally 420,000 unnecessary miles over the life of the quarry with the resultant CO2 emissions, damage to roads, noise pollution, congestion etc.</p> <p>In our opinion it is not a sustainable option.</p>	
Bedford Borough and Central Bedfordshire Council		Policy 3	<p>With regard to Policy 3, we have particular interest in allocated site A4 (Manor Farm & Lavendon Mill) given its proximity to the border with Bedford Borough and would hope to be consulted on any application for this in the future. Given the rural nature of the area, particular consideration would need to be given to lorry numbers and routeing. It would be inappropriate to seek to resolve this level of detail as part of the forward planning process, but it should be highlighted as an issue to be addressed at the application stage.</p> <p>Given that the objective of the plan is to provide a sustainable supply</p>	Noted

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			of aggregates to Milton Keynes, it would, in any event, appear to be illogical to restrict the movement of mineral from this site such that it is transport eastwards into Bedford Borough.	
B Morton		Policy 3	<p>I set out below my comments on the above Plan in regard to the Allocations adjoining Lavendon Mill Lavendon.</p> <p>1- There is no evidence that the landowners will agree to have their land excavated i.e not signed up.</p> <p>2- The proposed traffic routes are problematical as they run through an adjoining Local Authority area who might not agree to the traffic.</p> <p>3- Consultation with Villagers does not mean that they are happy to participate in the Plan process – no way of recording their views at the respective village meetings.</p> <p>4- A plan approved at a specific date is not flexible at all. Can the Council prove that it has sufficient funds/staff etc to monitor the Plan in relation to changing circumstances over the years?</p> <p>5- Access for this Allocation in onto a B Class road – B565. Unless the Lavendon Bypass and the Olney Bypass are built first there will be serious traffic problems in the area.</p> <p>For the above reasons I do not feel that this Mineral Plan is SOUND, JUSTIFIED nor EFFECTIVE.</p> <p>I am happy to expand further on this matter should that prove necessary to have this Allocation removed from the Minerals Plan.</p>	<p>Ownership issue – Supporting information submitted to the Council indicates that the proponent has arrangements in place with the landowners.</p> <p>The potential routes to markets after the B565 are all strategic A roads. No vehicles will be allowed on Olney Road between the site and Lavendon village.</p> <p>-</p> <p>Monitoring of minerals sites is able to be charged for by the planning authority.</p> <p>Traffic would not need to go through Lavendon village although it is accepted that to serve the Newport Pagnell/Milton Keynes market it would need to go through Olney.</p>
Weston Underwood Parish Council		Policy 3	<p>No objection to the proposed enlargement of the Weston Underwood Quarry and pleased to see that the west side of the village has not been taken forward as we would not welcome this.</p> <p>The Parish Council's biggest concern is the potential for heavy works traffic going through the village from Lavendon to Old Wolverton or Lathbury.</p>	<p>Noted.</p> <p>All planning applications for minerals extraction should be accompanied by a transport assessment.</p>
Lathbury Parish Meeting	Unsound – Justified, Effective and Consistent with national	Policy 3	<p>The inclusion of two sites with a relatively minor separation distance (100's of meters) leads to undue concentration of extraction in a small area.</p> <p>The impact of traffic, loss of amenity, noise, dust, visual intrusion etc. are concentrated in this small area and impacting on the residents of</p>	<p>Minerals can only be worked where they are found. Phasing of operations will help to minimise potentially adverse impacts to acceptable levels.</p> <p>Factors such as potentially adverse</p>

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	policy		<p>the Parish. The clause that the two sites (Quarry Hall and Northampton Road) are phased so as not to be operational at the same time means that these impacts will have a longevity of an estimated 15 years plus. Further information included in the LPM response to the Draft Plan Consultation of August 2014 – submitted November 2014. Proposed Amendment The Site-specific allocations are re-assessed based on the late inclusion of buffering to justify that the volumes quoted are realistic for extraction.</p>	<p>impacts on general amenity have been given due consideration as per the site assessment methodology. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) would be required to ensure that operations did not exceed acceptable limits.</p>
T Shrimpton	Objection	Policy 3	<p>Owing to the form being closed and expired because of a consultation error (acknowledged by Mr. Wilson) I am writing my OBJECTION in this email. 1 – This plan, for this extraction for gravel, is far too close to the ancient hamlet of Passenham’s listed, ancient and historic buildings. The Mill is mentioned in the Domesday book. 2 – Passenham is surrounded by ancient water meadows which are changing with the extraction of gravel all around the hamlet, the infill rising the water level in a flood. Passenham forms a pocket of high landscape quality and visual interest. 3 – We have had dust, pollution and noise for over the past 20 years. Originally told it would be 5 years. 4 – The ouse valley is rich in gravel – why not take it from Buckingham side of the plant away from buildings. 5 – The Environmental Agency’s report is very apt and should NOT be ignored. EA Response We have considerable flood risk concerns about this site. The site is situated on an island within two branches of the River Great Ouse and is within the functional floodplain (flood zone 3b). The following specific issues need to be addressed as part of an application: - We would object to the construction of any structure on this site which would impede floodplain flows. It is therefore unlikely that any bunding would be allowed on this site and any ancillary activities would need to be sited elsewhere. - Our normal stand-off distance of 30 metres would not be achievable on this site and therefore any application would need to demonstrate</p>	<p>Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits. Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January 2016 about the consultation on the Milton Keynes Council Minerals Plan. The publication (proposed submission) stage of the planning process is when the plan that the council wishes to adopt is publicised and on which formal</p>

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			<p>how the river would be prevented from breaking into the excavation. The likely vicinity to the river is such that it would also need to be demonstrated that the stability of the river bank and channel can be maintained.</p> <p>- Access would need to be gained via at least one river crossing. The safety of those working on the site would need to be carefully considered given that the only exit from the site would be by crossing the river.</p> <p>- We have a gauging site at Passenham sluice. Any application would need to demonstrate that the gauged site and levels would not be affected.</p> <p>Flood defence consent from the Environment Agency will be required for any works in, under, over or within 9m under s109 of the Water Resources Act (1991) under the Anglian Region Bylaws. As part of any planning application, we would need to assess whether consent is likely to be granted.</p> <p>This site falls with the Buckingham and River Ouzel IDB district. They should be informed of this potential site allocation in order to assess the impact on any drains/ ordinary watercourses within their area.</p>	<p>representations can be made. It is therefore the case that public drop-in sessions are not normally held at this stage as the proposals are not up for discussion as it will be the role of the examination and the public hearing sessions to do this - the only real role of a public meeting at this stage would be to inform residents how to make representations. Although it is not the norm (and note that such meetings are not held in Northamptonshire for example) some public meetings were carried out in Milton Keynes at the request of Councillors and Parish Councils and one was held at Old Stratford on 8 March 2016, albeit close to end of the period for representations.</p> <p>As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated. The EA response cited actually refers to a proposed allocation in Northampton put forward as part of the Northamptonshire Minerals and Waste Local Plan Update and not the MK Minerals Local Plan. The EA has not objected to the Final draft MK Minerals Plan.</p>
B Kaur	Unsound, Not legally compliant	Policy 3	<p>Please note that I am not qualified in planning etc and can only make our feelings known based on how it will effect our lives. We already know what it is like to have quarry works near us and how long we have had to endure this, but to have 2 further proposals (from MKCC & NCC) which are closer to our homes is unbearable and very unfair. I know that minerals have to be extracted but how many other areas have proposals so close to residents? We are proud of</p>	<p>Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential</p>

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			<p>Passenham as it is considered an ancient hamlet and many listed buildings, the dust is constant along with the noise which we can see only getting worse. Until recently the areas being considered for extraction were in a Conservation area. Have all other areas more suitable been fully explored?</p> <p>My other concern is the floods already experienced in the area, how will the works when completed affect the severity of flooding? Will we get compensation if insurers refuse to provide cover?</p> <p>Will the planned timescale be adhered to? in our experience this is most unlikely as the existing works have been there for over 20 years!</p> <p>Please consider these comments along with the completed form</p> <p>I would like to object to the Milton Keynes Minerals Local Plan which relates to the proposed extension of the extraction at the Calverton Quarry for a number of reasons.</p> <p>Firstly we the residents of Passenham village were not notified until the consultation period had expired and had only found out by accident. This oversight was admitted by Mr Wilson (Development plans Manager for MK Council) as an Administrative error. This is the reason we are objective after the initial closing date which was extended for us to make our responses.</p> <p>We are surprised that such a proposal is being considered in an area of special character and so close to an ancient hamlet (mentioned in Domesday book) of Passenham and near a conservation area. There are many listed buildings in the village such as the Dovecote (proposed works planned about 130m from the Dovecote), Church and Passenham Manor. We are surprised that no consideration has been taken for the residents who have to live such close proximities to mineral works.</p> <p>For residents of Passenham, it is important that this proposal should not be viewed in isolation. This is because, for the past twenty two years the lives of Passenham residents have been subjected to nearby mineral extraction. This proposal by MKC would add to the plight of residents. Passenham Residents are already well aware of the noise/ dust pollution as the existing working quarry which should have only been for around 5 years and is still been worked</p>	<p>properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits.</p> <p>Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January 2016 about the consultation on the Milton Keynes Council Minerals Plan.</p> <p>The publication (proposed submission) stage of the planning process is when the plan that the council wishes to adopt is publicised and on which formal representations can be made. It is therefore the case that public drop-in sessions are not normally held at this stage as the proposals are not up for discussion as it will be the role of the examination and the public hearing sessions to do this - the only real role of a public meeting at this stage would be to inform residents how to make representations. Although it is not the norm (and note that such meetings are not held in Northamptonshire for example) some public meetings were carried out in Milton Keynes at the request of Councillors and Parish Councils and one was held at Old Stratford on 8 March 2016, albeit close to end of the period for</p>

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			<p>after more than 20 years! Not only has MKC drafted a mineral extraction plan but so has Northampton CC in the same areas behind Passenham.</p> <p>Will the proposed works abide by the timescales for extraction be strictly adhered to or will the works go on unmonitored long after it should be stopped? Reassurance if works go ahead be given to a fixed length of time. Has all action been taken to consider other areas which are not near residents? Why not move the quarry further away into farm land towards Buckingham etc?</p> <p>I am also very concerned about the flood plains as the areas floods regularly, how will the extraction works affect flooding? No real plans seem to be clear what will happen to the land on final completion? These proposed works do not adhere to the Environmental Agency response regarding considerable flood risk concerns.</p> <p>We feel let down that the residents have not been considered and how these works will affect them after having to endure so much works already.</p> <p>Please note my strong objection to these plans.</p> <p><i>Proposed Amendment</i></p> <p>I feel that it does not adhere to the Environmental Agency response:</p> <p><i>We have considerable flood risk concerns about this site. The site is situated on an island within two branches of the River Great Ouse and is within the functional floodplain (flood zone 3b). The following specific issues need to be addressed as part of an application:</i></p> <ul style="list-style-type: none"> <i>- We would object to the construction of any structure on this site which would impede floodplain flows. It is therefore unlikely that any bunding would be allowed on this site and any ancillary activities would need to be sited elsewhere.</i> <i>- Our normal stand-off distance of 30 metres would not be achievable on this site and therefore any application would need to demonstrate how the river would be prevented from breaking into the excavation. The likely vicinity to the river is such that it would also need to be demonstrated that the stability of the river bank and channel can be maintained.</i> <i>- Access would need to be gained via at least one river crossing. The safety of those working on the site would need</i> 	<p>representations.</p> <p>As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated. The EA response cited actually refers to a proposed allocation in Northampton put forward as part of the Northamptonshire Minerals and Waste Local Plan Update and not the MK Minerals Local Plan. The EA has not objected to the Final Draft MK Minerals Plan.</p>

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			<p><i>to be carefully considered given that the only exit from the site would be by crossing the river.</i></p> <p><i>- We have a gauging site at Passenham sluice. Any application would need to demonstrate that the gauged site and levels would not be affected.</i></p> <p><i>Flood defence consent from the Environment Agency will be required for any works in, under, over or within 9m under s109 of the Water Resources Act (1991) under the Anglian Region Bylaws. As part of any planning application, we would need to assess whether consent is likely to be granted.</i></p> <p><i>This site falls with the Buckingham and River Ouzel IDB district. They should be informed of this potential site allocation in order to assess the impact on any drains/ordinary watercourses within their area.</i></p> <p>Also any proposed mineral extractions should take place further away from Passenham and not closer.</p> <p>I also feel that it is not my place to offer solutions but to make my feelings known to the proposed mineral extractions so close to our home.</p> <p>More consideration should be taken to the area that has special character and near conservation area.</p>	
R Norman	Unsound and not legally compliant – Justified and effective	Policy 3	<p>Residents of Passenham were unaware of the proposed extension until the consultation period, administrative error is being blamed, this is not acceptable.</p> <p>The Plan aims to minimise the effects of mineral extraction for the quality of life for nearby residents, this work will be carried out 130 metres from my property, which includes a grade 2 listed building, I consider this to be too close and no buffers will effectively reduce, levels of noise and dust from excavating, transportation, processing, landfilling and then restoration sufficiently for this to be acceptable.</p> <p>Previous extraction work has not been completed within timescales set out in the plan, Passenham has endured this disruption for over 20 years.</p> <p>Flood risks – the proposed extraction site is a functional floodplain, recently restored areas have now reduced levels of floodwater capacity, evidence of this was seen this month, the Environment Agency raised concerns about flooding in our area to NCC. As the</p>	<p>Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January 2016 about the consultation on the Milton Keynes Council Minerals Plan.</p> <p>As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated.</p> <p>Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance</p>

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			<p>sites are on the same floodplain surely the same concerns apply. I have included some paragraphs taken recently. Why should permission be granted where extraction would be in detriment to the local landscape?</p>	<p>between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits.</p>
Miss S Cawthorne	Not legally compliant, unsound - Justified	Policy 3	<p>No consultation with Passenham Residents until now, and we were all unaware of the proposed extension until recently of the Calverton end to the existing Site. Having lived in this hamlet for nearly 14 years, we were led to believe on initial conversations with Quarry owners that their time here was limited and we were looking at a possible 5 years extension only. We even looked at the Inspector's Report which stated that the extraction activities in Passenham would have a limited time, so its quite baffling that the quarry is still in operation. As you are aware the Quarry has been in place for the last 22 years where application after application has been approved by the Council without any consideration for the residents that have had to endure the constant moving of plant, noise, dust, I see this all day out of my window, not a pretty sight I can assure you, and the environmental impact of this constant extraction is totally unacceptable, and all being carried out in a conservation area. The latest proposal is totally unreasonable being around 100 metres from Passenham properties, quite hard to believe or even understand that this might be approved due to the whole area being in a conservation area, this truly doesn't seem to make any difference at all. Our property values are being affected by every extension, but nobody seems to care. <i>Proposed amendment</i> I believe Milton Keynes Council have plenty of other Land they could</p>	<p>Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January 2016 about the consultation on the Milton Keynes Council Minerals Plan. As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated. Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site</p>

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			<p>extract from, and if this goes ahead it will not affect Milton Keynes Council or its residents, so they will not encounter any disruption. Instead its the poor residents of this beautiful hamlet who will again suffer.</p> <p>In simple terms, I am appealing to MK Council to not go ahead with this proposal as it is far too close to Passenham properties, so please spare a thought for the residents of Passenham who have a human right to some peace and quiet after enduring this for 22 years?</p>	management plan would be required to ensure that operations did not exceed acceptable limits.
Dr J Singh	Objection	Policy 3	<p>Please see below my objections towards the proposed extension of the extraction at the quarry.</p> <p>I am a resident at Passenham Hamlet and would like to bring to your kind attention how this extraction will effect our lives.</p> <p>There are extensive quarry works behind our house and I am aware of the fact how the noise and vibrations we felt from these works have impact on our lives.</p> <p>We have had to endure this over several years.</p> <p>To have further two proposals (from MKCC & NCC) which are very near to our homes will be noisy, unbearable vibrations and very unfair to our quite living at the hamlet with increased traffic and dust.</p> <p>We understand that the minerals have to be extracted but fail to understand why it has to be so close to residents? We are proud of Passenham Heritage as it is considered an ancient hamlet and many listed Grade I and grade II buildings, the dust is constant along with the noise an vibrations, which will have significant impact on our historic built environment, historic fabric and surroundings.</p> <p>We have constant flooding behind our houses and our concern is the floods already experienced in the area, how will the works when completed affect the severity of flooding?</p> <p>The insurance companies will not provide cover for our buildings, will we get compensation if insurers refuse to provide cover?</p> <p>The existing quarry works have been here for over 20 years! And will you ensure that the planned timescale be adhered to? in our experience this is most unlikely</p> <p>Please consider these comments in your proposed application.</p>	<p>Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits.</p> <p>As a point of clarification, with the exception of the soil stripping undertaken in February 1998, operations have been ongoing since 2004 (twelve years) and not for more than twenty as stated.</p>
Mr and Mrs Puddefoot	Objection	Policy 3	<p>Because of an administrative error from the Council we have only recently gained any knowledge of extension proposals .</p> <p>This objection is mainly to the proposed extension of the extraction at</p>	Old Stratford Parish Council, which covers Passenham, was notified in October 2013, August 2014 and January

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			<p>the Calverton quarry . My Wife and I moved to this beautiful Manorial Hamlet some 17 years ago and at the time the residents of Passenham were fighting against the expansion of the Quarry then and after many meetings with the MK Council with various unkept promises of cessation dates of mining and also infill and clear up in the Hamlet we find that we could have many more years of dust ,unbearable noise and constant heavy duty haulage movement around and quite often through this hamlet (and Conservation Area). This extension would now expand boundaries to within metres of the Grade I and Grade II Listed buildings in Passenham and in my view have a major impact on these properties not to mention the fact that all residents pay high council tax payments and deserve some compassion and consideration for your future planned disruption.</p>	<p>2016 about the consultation on the Milton Keynes Council Minerals Plan. Factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits.</p>
Ms C Prail	Objection	Policy 3	<p>I am writing with concern, following Milton Keynes Council's publication of their Minerals draft final plan (http://miltonkeynes-consult.objective.co.uk/portal), that the extraction of gravel from the Lavendon Mill site, if it follows the Milton Keynes Council proposed transport route, will increase the use of heavy plant and heavy transport vehicles along the A428, through the Bedfordshire village of Turvey, to the junction of the A422. As a home owner, with a Grade 2 Listed property within less than 10m of the A428, I am greatly concerned that the projected number of heavy transport vehicles will cause a significant increase in both noise and vibration. The A428 is already a busy road, and any increase in heavy transport vehicles noise is have a detrimental effect on my family's quality of home life. I am also gravely concerned that the significant increase in road vibration from the heavy transport vehicles, will cause damage or subsidence to our Grade 2 Listed property, that was not built almost 200 years ago to handle such environments. While I appreciate that routing traffic via a different</p>	<p>Plant used for processing mineral is generally transported to site to remain for the duration of works (or the particular operational phase if brought in specific works) – ie it does not generally come and go constantly. The level of potential increase in HGV movements is low, the site assessments address potentially adverse impacts such as routing and access and identifies the need for further assessment to accompany the planning application with respect to more detailed matters. The scope of the assessments is set out in the methodology. It is important to note that the level of assessment (and scope of methodology) is proportionate to the plan-</p>

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			county will reduce Milton Keynes Councils responsibility in regards to residents effected, I believe that effected communities should either be taken into account and consulted properly, or heavily compensated for any reduction in quality of life or damage to properties. I look forward to your response addressing my concerns.	making process and so does not include more detailed assessments/works that would be expected to accompany a planning application – such as a full transport assessment.
South Northampton shire Council	Objection	Policy 3	<p>Thank you for consulting South Northamptonshire Council regarding the Milton Keynes Minerals Local Plan (MKMLP). The consultation has been considered and Milton Keynes Council is hereby advised that South Northamptonshire Council objects to the Final Draft MKMLP for the following reasons:</p> <p>i) Whilst South Northamptonshire Council has no objection in principle to the spatial strategy for minerals extraction, an issue raised previously regarding the MKMLP has not been addressed. There is a major adverse impact, identified regarding a proposed allocation – Site A1: Calverton/Passenham Extension. This site is in close proximity to Passenham Village, Listed Buildings and Passenham Conservation Area, and extractive operations will impact upon and affect the setting of these historic assets. The Council considers that insufficient measures have been identified to avoid or satisfactorily mitigate any such impact, in the event this site was to be selected for sand and gravel extraction. Further site investigation should be undertaken and assessed, and any mitigation measures or changes necessary, must be identified, prior to any inclusion of this site in the MKMLP.</p> <p>ii) Policy 10 of the Draft MKMLP seeks to conserve and enhance the historic environment and heritage assets, but it has not been explained how this would be done, in respect of the above site and the Passenham Conservation Area and Listed Buildings.</p> <p>iii) The Council looks forward to a written response regarding the above issues, prior to the Draft Plan being submitted for Examination in Public.</p>	<p>The site assessments address potentially adverse impacts, including historic environment/heritage assets, and include an overview of standard avoidance and/or mitigations measures and the level to which such measures would reduce the identified impacts.</p> <p>The scope of the assessments is set out in the methodology. It is important to note that the level of assessment (and scope of methodology) is proportionate to the plan-making process and so does not include more detailed assessments/works that would be expected to accompany a planning application.</p>
Dr D Crowe	Unsound – Justified, effective, consistent with national policy	Policy 3	<p>The Northampton Road site is listed with an approximate yield of 0.65 MT. In the site appraisal (Appendix1) it is listed as a yield of 0.55 MT. Are either of these figures correct? If so, which one?</p> <p>Suggested change - In a document of this significance it is important at least to be CONSISTENT</p>	This has been corrected in the Submission Plan.

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Buckingham shire County Council		Policy 5	<p><i>Proposals for the extraction of minerals will be permitted where it can be demonstrated that the development complies with relevant local plan policies, maximises recovery of the reserve, minimises waste, promotes the best end-use of materials, ensures land stability, avoids and/or mitigates potentially adverse impacts (including cumulative impacts) to acceptable levels and is environmentally feasible.</i></p> <p><i>Proposals for the extraction of building or roofing stone should also demonstrate how the proposal supports conservation of historic building and structures, conservation areas or local distinctiveness and that this is the main purpose of the proposal.</i></p> <p><i>Preference will be given to proposals for the extraction of minerals at the site-specific allocations identified in Policy 3 and 4.</i></p> <p><i>Proposals for the extraction of minerals at unallocated sites will need to demonstrate that the need cannot be met from existing commitments or allocations, unless:</i></p> <ul style="list-style-type: none"> <i>i. the proposal is for the prior extraction of mineral resources within a Mineral Safeguarding Area in order to avoid needlessly sterilising mineral resources of local and national importance;</i> <i>ii. extraction of the mineral can be clearly demonstrated to be ancillary to the proposed development (e.g. agricultural reservoirs) or</i> <i>iii. allocated sites are not coming forward and being implemented or that average sales figures indicate an increase in need for extraction that cannot be met from allocated sites.</i> <p>The National Planning Policy Framework (NPPF) refers at paragraph 142 to the long term conservation of minerals, and this is especially achieved by designating Mineral Safeguarding Areas. There is always the scope for mineral to be used for lower grade uses than it deserves. However the introduction of the Aggregates Levy may have curbed this. In addition, the Plan should acknowledge that the end use of minerals is incapable of being influenced once the mineral leaves the quarry.</p>	Although the Councils ability to control the end use of materials once the mineral leaves site may be limited the proposed end use can be taken into consideration in determining the need for the development and planning applications.
Lathbury Parish Meeting	Not legally compliant – Unsound – Justified and effective.	Policy 5	<p>There is a tension in this policy its aims to “maximize recovery of the reserve” and “mitigate potentially adverse impacts (including cumulative impacts)”. For some sites it is not possible to achieve both aims and a balance needs to be struck.</p> <p>The policy – whilst stating that “...extraction of minerals will be permitted where it can be demonstrated that the development</p>	The policy states “maximise recovery of the reserve” not that the reserve should be exhausted in its entirety. That the factors listed in the policy are to be taken on balance is inferred, as this is the role of the planning system – to take a measured

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			<p>complies with...avoids and/or mitigates potentially adverse impacts (including cumulative impacts) to acceptable levels..." has not taken into account any of these factors in the allocations in Policies 3 and 4. Further information included in the LPM response to the Draft Consultation of August 2014 – submitted November 2014.</p> <p>Proposed Amendment - Policy 5 should be reworded as follows: "Proposals for the extraction of minerals will be permitted where it can be demonstrated that the development complies with relevant local plan policies, <u>where possible</u> maximises recovery of the reserve <u>subject to the avoidance of unacceptable adverse impacts (including cumulative impacts)</u>, minimises waste, promotes the best end-use of materials, ensures land stability, avoids unacceptable adverse impacts (including cumulative impacts) and is environmentally feasible."</p>	<p>and balanced approach to necessary development and its potential impacts. Potentially adverse impacts have been given due consideration as per the site assessment methodology.</p>
Lathbury Parish Meeting	Unsound – justified, effective and consistent with national policy	Policy 7	<p>The Draft MLP is presented as a forward looking-document but the strategy for use of recycled aggregates is based purely on historic data. Future trends should also be considered.</p> <p>Given the long-term commitment of Milton Keynes Council to recycling, recycled aggregates should feature more prominently than they currently do. Government policy (National Planning Policy Framework (NPPF) §143) encourages the use of alternative materials instead of quarrying and dredging for primary aggregates. Other Councils refer to the use of recycled aggregates within their MLPs or Sustainability Policies. For example: <i>..They have an increasing use in new construction and road building and play a valuable in reducing the demand for new virgin material to be quarried for use as primary aggregate. (Joint Lancashire Minerals and Waste Plan §3.32) Give preference to the use of recycled granular materials (Hampshire County Council – Aggregate recycling)</i></p> <p>The 2004 European standards for Aggregates do not discriminate between virgin and recycled material. The focus is on fitness for purpose rather than origin of resource.</p> <p>Further information included in the LPM response to the Draft Plan Consultation of August 2014 – submitted November 2014.</p> <p>Proposed Amendment The Council should include in the MLP a review of recycled aggregates availability including future trends within the Borough and</p>	<p>The plan supports facilities for secondary and recycled aggregate - for example Policy 7 and Strategic Objective 4 "Maximise the ... use of secondary and recycled materials." Paragraph 4.30 does note that the majority of development in the Borough is green-field and that few buildings and structures are demolished. It should be noted that increasing recycling of aggregates would not supplant the need for land won provision.</p>

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			<p>surrounding area.</p> <p>The MLP should include a value of recycled material within its estimate of Aggregates, This should consider future estimated availability of materials and not historic data. This value should then be considered as part of the land bank.</p> <p>Policy 7 should be reworded to reflect the outcomes of the above Recommendations.</p>	
Buckingham shire County Council		Policy 8	<p>The NPPF seeks the safeguarding of all forms of minerals infrastructure at paragraph 143, including facilities for concrete batching, manufacture of coated materials and other concrete products. Policy 8 does not provide protection for these forms of development, but only refers to '<i>Proposals for the storage, handling, processing and transport of minerals</i>'. Facilities for the manufacture of concrete and coating of stone are especially important in the construction and maintenance of the built environment, and this policy is not sufficiently positive, and therefore not sound. Although these are not 'county matters', it should be remembered that Milton Keynes is a unitary authority, and therefore responsible for the planning control of all forms of development. The safeguarding, promotion and enabling of these kinds of facilities (for manufacturing products, manufacture of concrete and coating of stone) is important to enable sustainable communities, as well as highlighted in national policy. The locations of these kinds of facilities should also be shown on a 'Policies Map', which appears to be absent from the Minerals Local Plan.</p> <p>Minerals can be divided between those which are consumed more locally, and those which travel further before being consumed, and which require facilities to enable their transport. This includes rail served aggregates depots, such as the facility at Bletchley. The proximity of this facility to Buckinghamshire suggests that it is likely to contribute crushed rock aggregate which may be consumed within the county and consequently it is of strong importance to Buckinghamshire. All minerals infrastructure should be positively safeguarded in accordance with the NPPF. Policy 8 does not safeguard such mineral processing facilities, and the rail served aggregates depot at Bletchley in particular. A new policy could be added to read:</p>	<p>As the respondent acknowledges manufacture of concrete and coating of stone are not county matters. On that basis these matters should not feature in a plan that is only concerned with county matter development. If anything it would be the covering of a non-county matter development in a county matter plan that is unsound - not the other way around.</p> <p>As the plan is not covering these matters they are not shown on the Policies Map.</p>

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			<p><i>All mineral infrastructure, including existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, inland waterways of minerals, including recycled, secondary and marine-dredged materials; existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate materials, will be safeguarded so as to ensure their ability to continue to function.</i></p>	
Mrs R Chandler	Unsound – effective, justified	Para 5.3	<p>believe that two proposed sites in such a small residential area will have a greater impact than is acceptable. The extraction can go on for 15 years and the impacts too large over this time to be acceptable. One site Quarry farm is in my opinion acceptable. Suggested Change Only having one site within Lathbury in the plan</p>	<p>Policy 3 sets out a requirement for the extraction of mineral from Quarry Hall Farm and Northampton Road, Lathbury to be phased to ensure that the two are not operational at the same time – avoiding cumulative impacts (that would otherwise potentially occur if the sites were to be worked at the same time). Potentially adverse impacts have been taken into account through the site assessment process, please refer to the Technical Annex.</p>
Wildlife Trust	Unsound – Consistent with national policy	Policy 9	<p>The statement “Minerals related development should contribute to and enhance natural assets and resources, including a net gain in biodiversity.”, should be amended by substituting “must” for “should” e.g. “Minerals related development must contribute to.....” This will make the policy consistent with NPPF paragraphs 7, 9, 109, 118, 152 and also with Policy 16 which states: “<i>Schemes must include objectives that will result in: biodiversity gains, enhancement of the local environment and amenity, and benefits for the local community and/or economy.</i>”</p>	<p>Policy 9 refers to natural assets and resources. NPPF paragraphs 7 and 9 are included in the introduction of the NPPF and are scene setters for more detailed policy set out within relevant sections of the NPPF e.g. Section 11. Conserving and enhancing the natural environment. None of the NPPF references provided require local plan policy that states proposals MUST contribute to and enhance natural assets and resources, including a net gain in biodiversity – specifically refer to paragraphs 9 (seeking/moving to), 109 (should) and 152 (should). Policy 16 refers to restoration schemes</p>

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			<p>The bullet points that follow are not entirely consistent with the NPPF, so are not sound in their current form. We cite below relevant paragraphs of the NPPF and why the current policies are not fully consistent with them. Then at the end we suggest possible policy statements to incorporate these points:</p> <p><i>“113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.”</i></p> <p>At present only international and national protected sites are referred to in terms of protection. Local environmental designations are only referred to in the sense of “Enhancing the natural environment” rather than “Protecting”.</p> <p><i>“114. Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;”</i></p> <p><i>“117. To minimise impacts on biodiversity and geodiversity, planning policies should:</i> <i>plan for biodiversity at a landscape-scale across local authority boundaries;</i> <i>identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;”</i></p>	<p>and so the word “must” is appropriate to secure delivery of restoration outcomes following extraction.</p> <p>Although the two policies (6 and 9) are related – in the same manner that the majority of the policies in the local plan are related as they deal with minerals development – the two are not directly comparable.</p> <p>Ref to Planning Authority Comment to Wildlife Trust Objective 6.</p> <p>Policies 5 through to 8 include the requirement to avoid and/or mitigate potentially adverse impacts to acceptable levels, Policy 5 also states proposal for extraction are to be environmentally feasible. This coupled with Policy 9 achieve the intent of, and is fully consistent with, the NPPF.</p>

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			<p>The ecological networks and planning across local authority boundaries is partly incorporated in the phrase “recognise wider ecological networks” however specific reference should be made to the Biodiversity Opportunity Areas (BOAs), which have been identified by the Buckinghamshire and Milton Keynes Biodiversity Partnership as the most important areas for wildlife conservation in Buckinghamshire, where targeted conservation will have the greatest benefit.</p> <p><i>“117. To minimise impacts on biodiversity and geodiversity, planning policies should:.....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;”</i></p> <p>At present there is no reference to priority habitats and priority species.</p> <p><i>“118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;”</i></p>	<p>This does not raise any matters of soundness. BOAs are referenced in the Minerals Local Plan paragraphs 2.11 and 5.7. Care should be taken when reading the plan and it should be taken as a whole rather than cherry picked.</p> <p>Refer paragraphs 2.11, 5.2, 5.7, Policy 15. In addition priority habitats and species are identified in the BAP which is itself referred to in paragraphs 2.11, 5.5, 5.7, 5.8, Policy 9, 5.40 Policy 16 and site profiles for sites A2 and A3.</p>

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			<p><i>This can be incorporated by extending the policy statement "Protecting environmental designated sites....."</i></p> <p><i>"118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;"</i> <i>Reference needs to be made to irreplaceable habitats</i></p> <p>Suggested Change The change we consider necessary is as follows: The amendment of the policy statement for Policy 9 to address the points raised in our answer to Q4. Our suggested text for this is as follows: "Minerals related development must contribute to and enhance natural assets and resources, including a net gain in biodiversity. This is achievable through: Protection as appropriate of sites, habitats and species: The highest level of protection will be given to sites and species of international and national importance; development affecting them will not normally be permitted. Development proposals which would result in the loss or deterioration of irreplaceable habitats including ancient woodland and aged or veteran trees will not be permitted unless the need, and benefits of, the development clearly outweigh the loss. Development proposals which would result in damage to or loss of a site of biodiversity value of regional or local importance, and habitats or species of principal importance will only be permitted where it has been demonstrated that:</p>	<p>Refer NPPF paragraph 118 "<u>When determining planning applications</u>, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles". This is a local plan not a planning application.</p> <p>With reference to the suggested text: Refer above.</p> <p>Reiterates national policy which is not necessary or required. Does not add any value to the plan in terms of local planning considerations/requirements. As above.</p> <p>Elevates sites of regional/local importance above requirements set out through the NPPF without any evidence to warrant such a policy.</p>

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			<p>o There is no suitable alternative site for the proposed development, o It has been clearly demonstrated that the benefits of the development outweigh the harm to biodiversity resources, and o The loss can be mitigated, or as a last resort, compensated to achieve an overall net gain to biodiversity.</p> <p>Enhancing the natural environment and recognising wider ecological networks, particularly seeking the connection of sites through large-scale habitat restoration and creation, with a primary focus on delivery in the Biodiversity Opportunity Areas. Contributing towards the Buckinghamshire and Milton Keynes Biodiversity Action Plan targets.</p> <p>“ The section beginning “Proposals for minerals-related development...” should be retained as is. This above change will make the plan sound in this respect as it would then be consistent with the paragraphs from the NPPF quoted in our answer to Q4 above.</p>	<p>Refer to Policy 16.</p> <p>None of the suggested amendments are themselves sound or justified and so have not been taken forward into the plan.</p>
D Adams	Unsound - Justified	Policy 10	<p>I feel that not enough weight has been given to the close proximity of the proposed site A1 to Passenham Village Conservation area in the County of Northamptonshire. I can see no identification of the important Grade I Heritage assets in Passenham of the importance of the setting of these Heritage Assets in the vicinity of the proposed site A1.</p> <p>Proposed amendment The site A1 Calverton/Passenham extension should be removed from the plan because of the misleading site specific information given and could be construed to be in a different location altogether.</p>	<p>Factors such as potentially adverse impacts on the historic and natural environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. The distance between the site and residential properties is not in itself prohibitive to extractive operations. In addition phasing of works and progressive restoration would reduce impacts. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits. The distance of the site to a heritage asset is not in itself the defining point</p>

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				regarding impact on setting. Potential impacts on the setting of heritage assets will be investigated in detail at the planning application stage with any avoidance and/or mitigation measures identified – this would form part of the information supporting the planning application. The allocation is an extension of an existing site and this would need to be factored into the landscape character, as would the fact that minerals extraction is by its nature a temporary form of development.
Lathbury Parish Meeting	Not legally compliant – Unsound – not consistent with national policy.	Policy 10	<p>The inclusion of the proposed Northampton Road, Lathbury site is incompatible with Policy #10 (Historic environment and heritage assets) since it is within 100 metres of two Grade II listed buildings (Lathbury Manor residential home and Home Farm) and would therefore have a major impact on their setting. it also runs counter to the Borough’s own Strategic Objective #6. (Protect and Enhance MK’s key environmental and heritage designations and seek to avoid and/or minimise adverse effects of minerals related development on heritage assets and environmental resources). The inclusion also fails to consider the Planning (listed Buildings and Conservation Areas) Act of 1990.</p> <p>Recent cases at the Court of Appeal (below) interpreting section 66(1) of the Act reinforce the importance of having special regard to desirability of preserving the settings of listed buildings (North Norfolk District Council V SSCLG & Mack: “Harm to Heritage Assets and their Settings”)</p> <p>The judgement in this case is significant because it reiterates that decision-makers considering harm to heritage assets cannot simply treat “the desirability of preserving the setting of a listed building as a mere material consideration to which they can simply attach the weight they see fit in their judgement”. The statutory duty [in section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990] goes beyond that and treats the preservation of the setting of a listed building as presumptively desirable. The Court accepted that</p>	<p>In identifying allocations factors such as potentially adverse impacts on the natural and historic environment, flood risk, environmental nuisance and general amenity have been given due consideration as per the site assessment methodology. Site-specific investigation into potentially adverse impacts, practical avoidance and/or mitigation measures (accompanying any planning application) and a site management plan would be required to ensure that operations did not exceed acceptable limits. Policy 10 would come into play at this planning application stage.</p> <p>The distance of the site to a heritage asset is not in itself the defining point regarding impact on setting. Potential impacts on the setting of heritage assets will be investigated in detail at the planning application stage with any avoidance and/or mitigation measures identified – this would form part of the information supporting the planning</p>

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			<p>the effect that the effect of the statutory requirement is to impose a duty on decision-makers to give “considerable importance and weight” or “high priority” to the desirability of preserving listed buildings and their settings. This they have failed to do in the draft Plan. The decision of the Court of Appeal is also important because it considers the relationship between the section 66(1) duty and paragraphs 132-134 of the NPPF, which deals with heritage assets. The Court held that the advice in those sections of the NPPF is consistent with section 66(1). However, it is not enough for decision-makers simply to carry out a straight balancing exercise between harm and public good under paragraph 134 of the NPPF. The Court held that the section 66(1) duty affects the weight given to the factors involved, and the decision-maker must ask “whether there is justification for overriding the presumption in favour of preservation”. This clarification of the definition of the setting of heritage assets, including listed buildings (see section below), make it highly probable that the Lathbury site would be rejected by the courts; given its proximity to heritage assets, namely the 7 listed buildings in the village, including the Grade 1 listed church, should a planning application come at a later date. “The visual aspect referred to in the Act includes identifying views of the site and views from the site. This approach has been supported by case law (Revival Properties V Secretary of State 1996) where the court held that when considering the impact of a development on a listed building or ancient monument it was proper to have regard to:</p> <ul style="list-style-type: none"> a) The view from the listed building or monument towards the proposed development; b) the view from the development towards the building or monument and; c) any other relevant view from the side.’ <p>On the basis of the above, the Northampton Road, Lathbury site should be withdrawn from the proposed plan, since any future planning application would more than likely be rejected. Further information included in the LPM response to the Draft Plan Consultation of 2014 – submitted November 2014. Proposed Amendment The Northampton Road, Lathbury site should be withdrawn from the</p>	<p>application. It should be noted that the High Court judgement referred to relates to a planning application and not to a local plan allocation.</p>

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Dr D Crowe	Unsound – Justified, effective, consistent with National Policy	Policy 10	<p>Plan.</p> <p>This Policy as currently worded effectively rules out a large part of the Northampton Road site in Lathbury. The entire village lies within 500 metres of this site, and includes a grade 1 listed Church and several other listed buildings. (Only two of these are given a passing mention in the Site Appraisal.)</p> <p>Suggested change See my original submission at http://miltonkeynes-consult.objective.co.uk/common/search/advanced_search.jsp?id=810610&lookingFor=representations&tab=list</p>	<p>The site assessments address potentially adverse impacts, including historic environment/heritage assets, and include an overview of standard avoidance and/or mitigations measures and the level to which such measures would reduce the identified impacts. The site appraisal states “The site is located approximately 1km from the Newport Pagnell and Sherington Conservation Areas, both of which have numerous listed buildings. There are <u>seven listed buildings within the village of Lathbury</u>. <u>The two listed buildings closest to the site</u> are located south of the boundary (within 100m) are Inn Farmhouse (Lathbury Manor) and Home Farm House. The grade II listed Sherington Bridge is located 530m to the east”.</p> <p>The scope of the assessments is set out in the methodology. It is important to note that the level of assessment (and scope of methodology) is proportionate to the plan-making process and so does not include more detailed assessments/works that would be expected to accompany a planning application.</p>
Dr D Crowe	Unsound – Justified, effective, consistent with National Policy	Para 5.19	<p>This does not even mention visual intrusion as a factor affecting quality of life – even though this is quite explicit in the National Planning Policy Framework. This is unfortunately typical of the low priority assigned throughout the plan to those directly affected by proposed extraction.</p> <p>A further example is paragraph 5.23 which needs to be greatly strengthened to make such mitigation measures a definite condition of planning permission – rather than something that ‘could’ be employed.</p>	<p>Visual intrusion is captured under “potentially adverse impacts” as referenced throughout the plan and its policies including Policy 12, and defined in the Minerals Local Plan Glossary in accordance with NPPF paragraph 143. The word “could” is used as not all of the listed measures are applicable to every site that may come forward over the plan</p>

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			<p>Suggested change See my original submission at http://miltonkeynes-consult.objective.co.uk/common/search/advanced_search.jsp?id=810610&lookingFor=representations&tab=list</p>	<p>period. The Local Plan addresses a range of proposed sites as well as unallocated sites hence policies and the supporting text needs to be broad enough to address more than just one site.</p>
Lathbury Parish Meeting	Not legally compliant – Unsound – Effective and consistency with national policy	Policy 12	<p>This part of the Draft MLP contains no reference to the negative impact of visual intrusion. Nor does it take adequate account of the cumulative effects of multiple impacts.</p> <p>The omission of visual impact and multiple impacts stands in contrast to national policy. The NPPF (§143) requires Minerals Planning Authorities to: set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do <u>not</u> have unacceptable adverse impacts on the <u>natural and historic environment or human health</u>, including from <u>noise, dust, visual intrusion</u>, traffic, tip- and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the <u>cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality...</u></p> <p>The PPG (§13) lists the environmental issues that mineral planning authorities must address. Among these are: noise associated with the operation/ dust / air quality / lighting / <u>visual impact on the local and wider landscape</u> / landscape character / archaeological and heritage features / traffic / flood risk / land stability / subsidence.</p> <p>In addition to its inconsistency with policy at national level, the lack of reference to visual impact represents an apparent change in policy in Milton Keynes. The 2006 MLP includes a relatively strong reference to visual impact, noting (p.37):</p> <p><i>Planning permission will be granted for mineral development providing that:...there will not be a significant adverse visual impact on any dwellings or other environmentally sensitive properties or from footpaths in the surrounding area taking into account any proposed ameliorative measures.</i></p> <p>Paragraph 5.19 discusses negative impacts on quality of life, including “environmental nuisance” impacts. Visual intrusion should be added to these impacts.</p>	<p>The policy addresses potentially adverse impacts that may affect quality of life and amenity and gives an indicative listing “amenity (compatibility of land use, dust, noise, vibration, light pollution etc)” – the use of etc. indicates that the list is not comprehensive and may include other factors . In addition the term potentially adverse impacts is defined in the glossary as per para 143 of the NPPF and so covers the matters raised in the response.</p>

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			<p>Proposed Amendment</p> <p>Proposals for minerals-related development must ensure, <u>through a framework evaluation</u>, that potentially adverse impacts, on quality of life and amenity (compatibility of land use, dust, vibration, light pollution, <u>visual impact</u> etc) are avoided and/or reduced to acceptable levels. <u>Singular and cumulative adverse impacts should be considered. Specific mitigation measures such as separation zones must be identified to minimize adverse impacts.</u></p> <p>Site-specific assessments may be required to determine existing / ambient levels, indentify potential impacts and appropriate avoidance and/or mitigation measures to be implemented. Where applicable, a sites management plan should be developed to ensure implementation and maintenance of mitigation measures throughout operations.</p> <p><u>Planning permission will be considered for minerals development provided that:</u></p> <p><u>a) There will not be a significant adverse visual impact on any dwellings or other environmentally sensitive properties in the surrounding area taking into account any proposed mitigation measures.</u></p> <p><u>b) satisfactory separation zones are provided to safeguard the amenities of nearby uses.</u></p> <p>Section 5 of the MLP should include separate paragraphs on existing business land use within close proximity to a proposed minerals site. Potential impacts on existing business should be considered.</p> <p>If MSA's are given protection of a separation area this protection should also be accorded to existing land-use, including, but not limited to, those activities identified as "High Sensitivity".</p> <p>Further information included in the LPM response to the Draft Plan Consultation of August 2014 – submitted November 2014.</p>	
Dr D Crowe	Unsound – Justified, effective and consistent with national policy	Policy 12	<p>This is inconsistent with the Plan's Objectives. It is far too weak. It does not mention visual intrusion; it says only that site-specific assessments <i>may</i> be required whereas to comply with Objectives 6 and 7 they obviously will definitely be required.</p> <p>Suggested change</p> <p>See my original submission in http://miltonkeynes-consult.objective.co.uk/common/search/advanced_search.jsp?id=810</p>	<p>Visual intrusion is captured under "potentially adverse impacts" as referenced throughout the plan and its policies including Policy 12, and defined in the Minerals Local Plan Glossary in accordance with NPPF paragraph 143. The word "may" is used as the level and</p>

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			610&lookingFor=representations&tab=list	content of assessments required for individual sites varies. The Local Plan addresses a range of proposed sites as well as unallocated sites hence policies and the supporting text needs to be broad enough to address more than just one site.
Lathbury Parish Meeting	Unsound – Justified, Effective	Policy 14	<p>Policy 14 covers the need for sensitive site design and layout to make a positive contribution to the local area and mitigate adverse impacts. It is not possible for mineral workings to make a positive contribution to the appearance and character of a rural area such as the Ouse Valley, so the policy as it stands is unsatisfactory, if not dishonest. The policy makes no reference to specific mitigations. Further information included in the LPM response to the Draft Consultation of August 2014 – submitted November 2014.</p> <p>Proposed Amendment</p> <p>Policy 14 should be generally reviewed. The revised policy should be amended to include reference to the need for adequate separation zones and other mitigation measures to minimize adverse impacts on surrounding areas.</p>	Paragraphs 5.30 to 5.33 explains the context to the Policy. No changes are required.
Dr D Crowe	Unsound – Justified, effective and consistent with national policy	Policy 14	<p>Paragraph 5.32 is nonsense. Moreover Policy 14 rules out any mineral extraction in the Ouse Valley: we defy anyone to show how a large industrial extraction site can 'make a positive contribution to the character of the area and local identity'.</p> <p>Suggested change</p> <p>See my original submission in http://miltonkeynes-consult.objective.co.uk/common/search/advanced_search.jsp?id=810610&lookingFor=representations&tab=list</p>	The policy is not limited to the extractive phase of the quarries life. Restoration of sites can most definitely make a positive contribution to the character of the area and local identity. In addition the extraction of building stone can also contribute towards character and local identity through supply of locally sourced building stone supporting conservation of historic building and structures, conservation areas or local distinctiveness.
Lathbury Parish Meeting	Unsound – Justified, effective	Policy 16	Paragraph 5.38 to 5.45 suggest possibilities for restoration and after-use of extraction sites, and outline the requirements of restoration schemes. However, evidence from restoration work in earlier sites (Ravenstone, Broughton Grounds and Mill Farm Gayhurst) does not inspire confidence that restoration will be fully effective:	Policy 17 covers the proper implementation of approved proposals including monitoring. Monitoring of minerals sites is able to be charged for by the planning authority.

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			<p>- The Ravenstone site took many years to restore after extraction was completed and resulted in poor grade agricultural land (Bucks CC was the Minerals Planning Authority when the site was initiated).</p> <p>- The restoration plan for Broughton Grounds did not deliver any meaningful and varied strategic objectives. It was restored to poor grade agricultural land, despite the opportunity afforded by the adjacent public rights of way and nearby community woodland which could have been extended to improve public amenity and biodiversity.</p> <p>- In the case of Mill Farm Gayhurst the intention was to create a varied wetland habitat and managed lakes with public access above the existing public rights of way.</p> <p>These sites were governed by earlier plans: it is therefore imperative that the new MLP makes proper provision for restoration and after-use in any proposed development and puts measures in place to ensure restoration schemes are completed effectively.</p> <p>A significant gap in the discussion of restoration and after-use is any proper consideration of funding and monitoring. These are particularly important in relation to longer-term after-use, which is necessary to achieve and sustain the planned restoration objectives (as specified in the NPPF). Plans for restoration and after-use may fail without adequate funding to ensure they are appropriately managed and monitored. Further information included in the LPM response to the Draft Consultation of August 2014 – submitted November 2014.</p> <p>Proposed Amendment</p> <p>Paragraph 5.45 should be re-worded as follows: Restoration schemes should identify the intended after-uses(s) and incorporate clear stages of restoration including layout and design plans as necessary, <u>and the funding to be allocated to restoration and after-use</u>. The scheme must identify an end date by which restoration works are to be completed as well as a programme setting out after-care (including provisions for ongoing management and maintenance) and monitoring requirements. There may also be a requirement for site-specific assessments (such as landscape character, environmental capacity, ecological networks, flood risk, etc) to accompany the restoration scheme. The restoration</p>	

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			<p>scheme must be submitted to the MPA and approved prior to commencement of development. <u>It will be monitored by the MPA until completed as planned.</u></p> <p>Policy 16 should be reworded as follows: The after-use of a site will be determined in relation to the land-use context, surrounding environmental character and requirements of the local community. Schemes must include objectives that will result in: biodiversity gains, enhancement of the local environment and amenity, and benefits for the local community and / or economy. They must also specify the funding that will be allocated to restoration and after-use. The MPA’s monitoring of the scheme will include after-use until this is effectively completed.</p>	
Wildlife Trust	Unsound – Consistent with national policy	Policy 16	<p>Paragraph 5.44 includes text as it should relating to aftercare however there is no reference to aftercare in Policy 16. This is not consistent with the following paragraphs of the NPPF: “143. In preparing Local Plans, local planning authorities should:.....put in place policies to ensure worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources), geodiversity, biodiversity, native woodland, the historic environment and recreation.”</p> <p>And “144. When determining planning applications, local planning authorities should:.... provide for restoration and aftercare at the earliest opportunity to be carried out to high environmental standards, through the application of appropriate conditions, where necessary.”</p> <p>Suggested Change The change we consider necessary is as follows: Suggested Policy Statement to add to the existing statements in Policy 16: “Proposals for restoration, aftercare and after-use should be</p>	<p>The plan is to read as a whole. Whilst policies do take precedence over the supporting text the text is there to provide additional detail, guidance and context (refer paragraphs 5.43 and 5.45). Further reference to aftercare is also made in paragraph 5.54 and 5.55 with respect to planning conditions regarding aftercare. Securing aftercare is addressed through the mechanisms identified in Policy 17.</p> <p>The NPPF (para 143) does not state that the local plan must address all of the factors in one policy. In fact it clearly states “put in place policies” Refer NPPF paragraph 144 “<u>When determining planning applications</u>, local planning authorities should” . This is a local plan not a planning application. The plan is compliant with national policy.</p>

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			<p>submitted with applications for mineral working, and should include provision for long-term maintenance of the after-use and enhancement of the environment.”</p> <p>This change will make the plan sound in this respect as it would then be consistent with the above quoted sections from paragraphs 143 and 144 in the NPPF.</p>	
Dr D Crowe	Unsound – justified, effective, consistent with national policy	Policy 16	<p>This is totally inadequate. It should be amended to require any minerals related development to supply secure financial resources for the restoration programme before development is permitted. Milton Keynes Council has shown itself totally unable to enforce restoration programmes in the past (a good recent example is the environmental mess at Willen Road, and almost all previous mineral developments in the area are equally bad). There is absolutely no reason to believe that this will improve in future.</p> <p>Suggested change See my original submission in http://miltonkeynes-consult.objective.co.uk/common/search/advanced_search.jsp?id=810610&lookingFor=representations&tab=list</p>	<p>The policy approach is in line with national policy and guidance, refer to NPPF paragraph 144 “provide for restoration and aftercare at the earliest opportunity to be carried out to high environmental standards, through the application of appropriate conditions, where necessary. <u>Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances</u>”. There is nothing exceptional in relation to this allocation that would warrant a bond or other guarantee.</p>
Lathbury Parish Meeting	Unsound - Effective	5.55	<p>The paragraph is not positive in its wording and allows for lax control at the planning stage.</p> <p>The paragraph should be generally reviewed to make is as robust as the 2006 MLP.</p> <p>Further information included in the LPM response to the Draft Plan Consultation of August 2014 – submitted November 2014.</p> <p>Proposed Amendment.</p> <p>The word “could” be replace with a positive “must”:</p> <p>5.5 Conditions that <u>must</u> be imposed as appropriate include:</p> <p>The revised paragraph should include separation areas and flood risk prevention amongst planning conditions.</p>	<p>This states ‘could’ because not all conditions will necessarily need to be used for all proposals.</p> <p>Flood risk is addressed adequately through national policy and guidance.</p> <p>The implementation of separation areas is addressed broadly under “protecting local amenity”. The categories have been kept broad to enable site-specific issues to be captured and addressed appropriately. A more specific policy may result in items being excluded unnecessarily.</p>
Berkeley Strategic Land Limited	Unsound - Justified	Policy 18	<p>Policy 18 proposes Mineral Safeguarding Areas (MSAs) in order that known locations of specific mineral resources are not necessarily sterilised by non-mineral development and are shown on Figure 7 (Minerals Safeguarding Areas with Milton Keynes). This indicates that land along the River Ouzel south of Newport Pagnell is defined as a sand and gravel safeguarding area.</p>	<p>The MSAs are based on the BGS data that incorporated the 1:10,000k maps and any other relevant information such as borehole data. The Mineral Resource Information in Support of National, Regional and Local Planning:</p>

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			<p>As noted above, survey evidence undertaken on behalf of Berkeley indicates that the remaining extent and quality of sand and gravel resources in this location is poor and unlikely to be viable for extraction purposes. In addition, other initial site investigations that have been undertaken on behalf of Berkeley indicate the presence of a number of other factors that will also impact on the viability and feasibility of extraction including the high water table, archaeological potential and land restoration.</p> <p>In combination, these factors will increase the costs of extraction which means that the location is unlikely to be attractive for commercial extraction purposes. On this basis, we consider that Policy 18 is not justified and therefore unsound in respect of safeguarding land along the River Ouzel south of Newport Pagnell. This location should be deleted from Policy 18 as a Minerals Safeguarding Area.</p> <p>In addition, we consider that specific working relating to the economic viability of extraction should be added to Policy 18 as additional circumstances where non-minerals development would be permitted. A similar clause was included in the Greater Manchester Minerals Plan which was adopted in April 2013. We also note a typographical error whereby text from the second criterion is duplicated within the first criterion which requires correction. The combined effect of our proposed changes to the Policy 18 wording is shown below:</p> <p>“Planning permission will not be granted for non-mineral development that would lead to the unnecessary sterilisation of mineral resources within a Minerals Safeguarding Area unless it can be demonstrated that:</p> <ul style="list-style-type: none"> - The mineral concerned is not of economic value <u>or economically viable to extract</u> or evidence confirms the absence of mineral resources, the proposed development is temporary or of a nature that would not sterilise the mineral resource or hinder future extraction” <p>Proposed amendment</p> <p>We therefore request amendment to both the primary area of focus for sand and gravel and Minerals Safeguarding Areas to exclude land along the River Ouzel south of Newport Pagnell on the basis of the limited and poor quality reserves that exist in this location and with revisions to the wording of both Policy 2 and 18.</p>	<p>Buckinghamshire and Milton Keynes was produced by BGS in 2003, since this date further studies have been undertaken: BGS 2010 Sand and gravel resources of Milton Keynes Borough; BGS 2007 Aggregate supply and demand for sustainable communities; and refining of the limestone formation in 2012. Information gathered from these studies was incorporated into the updated Mineral Resources Map 2012; this map has been used as the base for identifying the geographical distribution of ‘known’ mineral resources in Milton Keynes. It is accepted that within the MSAs there may be locations where extraction may not be economically viable but the plan is not going to tinker with the generality of the MSAs where some work has been undertaken that may prove that this is the case. This information needs to come into play if applicants seek at planning application stage to sterilise resources identified in an MSA through non-mineral development.</p> <p>The reference to economic viability proposed for the first criterion in Policy 18 is not necessary as the matter of economic viability is covered in the paragraph of the policy following on from the list of criteria.</p>

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Lathbury Parish Meeting	Unsound – Justified, Effective, Consistent with national Policy	Appendix 1: Site Profile – A2 Quarry Hall Farm	<p>The Quarry Hall Farm site, although a little further from Lathbury village than the Northampton Road site, would have a have negative effect on the quality of life in Lathbury in terms of visual impact, noise and potentially dust. The impact on Lathbury would be particularly, and unacceptably severe if traffic from the site used the B526, which run directly through the village. Traffic on this road is already a problem in the Lathbury stretch of the road there have been two fatalities in the last few years, and three serious collisions in the last twelve months. This is therefore a serious constraint.</p> <p>Whilst mentioning the sites proximity to Newport Pagnell Conservation area (1.5kms) the proximity of 7 Grade I and II listed buildings within the village of Lathbury itself are ignored.</p> <p>A popular footpath (right of way) runs along the northern boundary of the site to the west of Quarry Hall Farm. This is another important constraint, but it is not mentioned in the site profile.</p> <p>None of these impacts is currently stated as a constraint in the site profile.</p> <p>Further information included in the LPM response to the Draft Plan Consultation of August 2014 – submitted November 2014.</p> <p>Proposed Amendment</p> <p>Site A2 should be re-assessed, based on accurate information on Lathbury and its proximity to the sites, cumulative impacts resulting from proposals for the Quarry Hall farm site in addition to Northampton Road, and the requirement to have regard to the protection of amenity, including environmental amenity and historic assets, and impact on local businesses.</p> <p>Failure to do so may mean the site is refused planning permission and therefore put in jeopardy the entire MLP.</p>	<p>All of the site profiles list the nearest conservation area(s) and then the nearest listed buildings.</p> <p>Draft Plan Stage Annex 1 Site Assessments (July 2014) refers to the footpath (as a Right of Way) on page 45 and states these could be temporarily re-routed to suit phased operations.</p> <p>No re-assessment is therefore required and the issue of cumulative impact does not arise as extraction will not take place at both locations at the same time.</p>
Lathbury Parish Meeting	Unsound – Justified, effective, Consistent with national policy	App. 1 – Site Profiles A3: N'ton Road, Lathbury	<p>The Site profile is at the very least economical with the truth – at worst it is dishonest and misleading in its content.</p> <p>The site would have several adverse impacts on Lathbury: ACTUAL not “potential”</p> <ul style="list-style-type: none"> - Close proximity of the site to a residential area – not assessed. - Close proximity of the site to a residential care home – not assessed. - Close proximity of the site to listed buildings – not fully assessed. - Proximity to existing business – not assessed. 	<p>See Draft Plan Stage Annex 1 Site Assessments (July 2014)- Page 52 in particular for sensitive receptors, Page 51 in particular for listed buildings, Page 54 for traffic/access and cumulative impacts.</p>

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			<p>- Traffic / access – not assessed - Cumulative impact – not assessed Yield – The yield is described as 550,000 yet in Policy 3 it's described at 650,000 – which, if either, is correct? No impact on the recently introduced specific development requirements bunding buffering has been considered on the yield.</p> <p>Heritage assets – this paragraph appears to be misleading as the furthest distance is written first, almost to distract the reader from the rest of the paragraph; tradition dictates that closest distances are written first in lists. In addition, whilst mentioning the sites proximity to Newport Pagnell and Sherington Conservation area, only two of the seven Grade I and II listed buildings within the village of Lathbury itself are included. Population – it is not a small proportion of the village directly located to the south. Approximately 90% of the village population lives in the area described. Further information included in the LPM response to the Draft Plan consultation of August 2014 – submitted November 2014. <i>Proposed Amendment:</i> Site A3 should be re-assessed, based on accurate information on Lathbury and its proximity to the sites, cumulative impacts resulting from proposals for the Quarry Hall Farm site in addition to</p>	<p>Yield- The original northern part of the site was 550,000t the site was amended to allow access to Sherington Road and avoid Lathbury village – the section added was identified through the additional call for sites round (Lathbury extension a) and is for an area of approx 7ha with reserves of 100,000t. The detail included in the main body of the plan is correct and the total of 650,000t has been used in preparing the plan and required calculations, however the total tonnage and other minor details were not carried forward from the Lathbury assessment/plan text into the technical annex and also therefore into the site profile in the appendix. It is therefore proposed to correct this in the Submission Plan. All of the site profiles list the nearest conservation area(s) and then the nearest listed buildings.</p> <p>The text is describing the area of the settlement that is directly to the south of the site. However it is proposed to change this in the Submission Plan to “Part of the village...”</p> <p>No re-assessment is therefore required and the issue of cumulative impact does not arise as extraction will not take place</p>

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			<p>Northampton Road, and the requirement to have regard to the protection of amenity, including environmental amenity and historic assets, and impact on local businesses.</p> <p>Failure to do so may mean the site is refused planning permission and therefore put in jeopardy the entire MLP.</p> <p>Specific Development Requirements – in both points use of the word “should” be replaced with “must”</p>	<p>at both locations at the same time.</p> <p>Specific development requirements- Detailed matters in respect to buffer areas should be determined at planning application stage and therefore ‘should’ is the appropriate term to use.</p>
Ms A Cavanagh	Unsound - Effective	App. 1 – Site Profiles A3: N'ton Road, Lathbury	<p>The same consideration has not been given to both all sites, while the following conditions have been applied to Lathbury site these same development requirements are not proposed to be applied to the Lavendon Mill site. There are houses within similar distance of the proposed Lavendon Mill site and therefore similar protection should be given to all residents.</p> <p>Lathbury Site - Specific development requirements</p> <p>1 Due to the proximity to the settlements of Lathbury and Sherington villages the site management plan (see Policy 12) should include a satisfactory stand-off and suitable bunding/buffering from extraction and processing operations particularly in that part along Northampton Road nearest to the settlement of Lathbury and this should be at least 100m from the nearest property if bunding of at least 5m high is used or at least 200m if bunding is not used and the bunding should be in the working part of the site.</p> <p>2 The processing plant should be located in an area that minimises visual intrusion and is away from the settlement of Lathbury and other dwellings and should be separated by at least 400m from any dwellings. The processing plant is to be linked to mineral extraction on the site and will not be used to process mineral from other sites.</p>	<p>The same level of careful consideration has been given to all sites, following the site assessment process. The two sites, and proximity to sensitive receptors are not similar.</p>
Mrs R Chandler	Unsound – Effective, justified, consistent with national policy	App. 1 – Site Profiles A3: N'ton Road, Lathbury	<p>There has been no mention in the closeness of The Thatched Barn to the proposed Lathbury site. Our land borders the proposed development. Our farming business is operated on this land.</p> <p>The proposed extraction for the Lathbury site has to be reduced in size so that it so not so close to the boundary of our land and business.</p>	<p>Proximity of residential dwellings is addressed in the site assessment, not every individual property is specifically identified and there is no need to do so.</p> <p>The level of sensitivity of surrounding land uses has been taken into account in the site assessments.</p> <p>The site profile includes specific development requirements including the need for set-backs, bunding and location</p>

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				of processing plant. Furthermore the site assessment clearly states that although the total site area is 36ha less than a third is proposed for extraction.
Dr D Crowe		App. 1 – Site Profiles A3: N'ton Road, Lathbury	<p>The Site Assessment for Northampton Road Lathbury is very misleadingly worded. There will be virtually no impact on Newport Pagnell, so why is this mentioned as a first constraint?</p> <p>On the other hand the entire village of Lathbury (NOT simply 'a small part') lies within 500 metres of the site, including several listed buildings which are not mentioned in the Appraisal.</p> <p>Because of this crucial fact the granting of any planning permission for extraction on this site will be subject to judicial review. In the event that such permission is struck down the Plan makes no alternative provision for achieving its identified tonnage. There is no contingency, and so the Plan cannot be considered robust.</p> <p>Suggested change See my original submission in http://miltonkeynes-consult.objective.co.uk/common/search/advanced_search.jsp?id=810610&lookingFor=representations&tab=list</p>	<p>The site assessment profile constraint refers to the Newport Pagnell Conservation Area "Site is located approximately 1km from the Newport Pagnell and Sherington Conservation Areas." Constraints are not listed in order of importance.</p> <p>This statement was corrected in the Submission Plan. The proximity of listed buildings is addressed in the site assessment/profile – refer Planning Authority Comment to Dr D Crowe Policy 10.</p> <p>None of the sites are considered "strategic sites" whereby the sites not coming forward/being granted planning permission within the plan period would affect deliverability of the overall plan. The site referred to has an approx. yield of 0.65Mt accounting for 19% of the total provision required over the plan period (total provision over plan period = 3.4Mt of which over 1Mt is already provided for through permitted sites).</p> <p>The plan includes a spatial strategy, site specific allocations and development criteria to guide investment and allow for both allocated and unallocated sites to come forward. This approach allows for in built flexibility. The plan is therefore considered to be robust in this regard.</p>
Mr T Richards		App. 1 – Site Profiles	I am writing with concern, following Milton Keynes Council's publication of their Minerals draft final plan, that the extraction of	Refer to Planning Authority Comment to Ms C Praill Policy 3.

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		A4: Manor Farm, Lavendon Mill	<p>gravel from the Lavendon Mill site, if it follows the Milton Keynes Council proposed transport route, will increase the use of heavy plant and heavy transport vehicles along the A428, through the Bedfordshire village of Turvey, to the junction of the A422.</p> <p>As a home owner, with a Grade 2 Listed property within less than 10m of the A428, I am greatly concerned that the projected number of heavy transport vehicles will cause a significant increase in both noise and vibration.</p> <p>The A428 is already a busy road, and any increase in heavy transport vehicles noise is have a detrimental effect on my family's quality of home life. I am also gravely concerned that the significant increase in road vibration from the heavy transport vehicles, will cause damage or subsidence to our Grade 2 Listed property, that was not built 100 years ago to handle such environments.</p> <p>While I appreciate that routing traffic via a different county will reduce Milton Keynes Councils responsibility in regards to residents effected, I believe that effected communities should either be taken into account and consulted properly, or heavily compensated for any reduction in quality of life or damage to properties</p>	

Duty to Co-operate

Name	Representation	Part	Comment	Planning Authority Comment
Buckinghamshire		DTC	<p><i>'Duty to Co-operate' engagement between Milton Keynes and Buckinghamshire has been by formal consultations in plans, and the meetings of the Buckinghamshire Planning Officers Group. However Buckinghamshire County Council has no record of receiving the 'duty to co-operate' e-mail dated 13 August 2014.</i></p>	We can confirm that an email was sent to the respondents email address on this date.