



Milton Keynes Waste Development Plan Document

**STATEMENT UNDER REGULATION 31
TOWN AND COUNTRY PLANNING ACT
(LOCAL DEVELOPMENT)
(ENGLAND) REGULATIONS 2004**

Consultation Summary

June 2007



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Foreword

This document is a summary of the consultation responses received following the submission of the Milton Keynes Waste Development Framework Document in January 2007.

The document includes a statement in accordance with Regulation 31 of the Town and Country Planning (Local Development) (England) Regulations 2004, summarising the consultation responses and includes information regarding giving notice of the Pre- Examination meeting.

Regulation 31 Statement

Milton Keynes Council Waste Development Framework Document Regulation 31 Statement

1.0 Introduction

1.1 This statement details the representations received for the Waste Development Plan Document submission document. It is prepared under Regulation 31 (2) of the Town and Country Planning (Local Development (England) Regulation 2004, which requires that as soon as reasonably practicable after receiving the representation a local planning authority must send to the Secretary of State:

- (i) a statement of the total number of representations made;
- (ii) copies of those representations;
- (iii) a summary of the main issues raised in the representations. Or
- (iv) a statement that no representations have been made.

1.2 A copy of this document will be made available on Milton Keynes Council website and at:

- (i) the Council offices at Civic Offices, 1 Saxon Gate East, Central Milton Keynes
- (ii) Milton Keynes Central Library
- (iii) Bletchley Library
- (iv) Newport Pagnell Library
- (v) Olney Library
- (vi) Stony Stratford Library
- (vii) Westcroft Library
- (viii) Woburn Sands Library
- (ix) Wolverton Library

2.0 The Waste Development Plan Document – Submission Document

- 2.1 The Waste DPD was formally submitted to the Secretary of State on 29th January 2007 and was made available for consultation over the following six week period between 31st January 2007 until 14th March 2007. It was made available at the locations detailed in paragraph 1.2 above, and was published on the web-site and in the local news press. Copies of the document were also sent to a large number of consultation bodies and other consultees.

3.0 Representations

- 3.1 In total 38 organisations and individuals duly made 57 representations on the WDPD. Of these, 5 respondents submitted 5 representations after the closing date of 14th March 2007. The Council has considered these and in view of the fact that there are only a few and the matters raised are broadly covered by other representations, it has been agreed that these will be treated in the same way as if they had been duly made.
- 3.2 Of the 57 representations received 12 considered the WDPD to be sound while 36 considered it to be unsound. Details of the respondents are included as Appendix 1.
- 3.3 Some of the respondents made comments on various policies but did not necessarily identify aspects as unsound, or fill in the response form. Where this has occurred MKC has attempted to gauge the appropriate test of soundness.

4.0 Summary of the Main Issues

4.1 The main objections and representations received relate to:

Conformity Issues

The South East England Regional Assembly feels that many of the Waste Development Plan Document policies are consistent with the adopted and emerging Regional Spatial Strategy. However SEERA raises the fact that the WDPD does not make provision for the disposal to landfill of a proportion of London's waste, as required by Policy W3 of RPG 9, Waste and Minerals, June 2006. The same issues have been raised by GOSE along with some other minor issues which the Council believes are capable of resolution.

Milton Keynes Council has raised an objection to the apportionment of London's waste being promoted in the South East Plan.

A meeting will be convened between the Council, SEERA and the Government Office for the South East to discuss this issue in the context of the approach taken in Hampshire and the fact that the Panel Report on the South East Plan is likely to be delayed beyond the date scheduled for the examination into the Milton Keynes Waste Development Plan Document.

SEERA has stated that if agreement can be reached with the council over amendments then the Assembly will withdraw its opinion that the Core Strategy in the WDPD is not in general conformity with the regional spatial strategy.

General Issues

- London waste should not go to Bletchley
- Concerns over future changes to waste collection
- No mention of commercial waste
- The strategic sites are too close to the city centre
- The Council's policy on "no incineration" is out of date
- Lack of consideration to residents in Haversham
- The submission document selects a site before the type of plant has been decided, this affects the credibility of the plan
- Supports aim for an in-vessel composting facility but such a facility should be attached to an existing new green waste composting facility and food waste should be kept separate
- Policies should provide for "on-farm" composting which will reduce transportation
- Partnership working should not be restricted Northamptonshire
- No clear approach to implementing and monitoring bio-mass – the DPD should include spatial actions to reflect this

- No provision made for the circumstances under which a reserve site would be released to meet capacity requirements
- Should include policy provision to deal with hazardous waste
- The WDPD does not have proper regard to policy E1 of the Milton Keynes Local Plan
- The DPD elements are premature pending the finalisation of the Core Strategy
- The options for the reserve site refer only to waste management not necessarily waste treatment
- Provision should be made for a treatment plant for kitchen waste
- No mention of overspill growth from MK into Newton Longville
- Views of Old Wolverton Residents Association not taken into account in identifying the sites in the WDPD
- Additional development near to Old Wolverton has not been taken into account
- The document does not reflect the legal status of Bletchley landfill site (text wording changes proposed)
- Incorrect wording references relating to Brooklands Ridge, should not be referred to as an inert landfill and wording changes suggested
- A thermal process for hazardous waste is proposed in North MK (?) (*possible omission site*)
- The information included on Autoclave process is incorrect and should be amended
- Restoration should not be considered a greater priority than landraising
- Capacity for inert waste unlikely to be sufficient over the plan period and extra provision should be made now
- Little mention of waste minimisation
- WDPD does not raise the topic of making adequate provision for the recovery of waste
- Bletchley should not be included because of noise and pollution

Policy WCS1 – Capacity requirements

- No allowance is made for London waste and the policy is therefore contrary to RSS

Policy WCS2 – Provision for waste management capacity

- No comments received

Policy WCS3 – Sustainable design, construction and demolition

- Imposes unnecessary requirements on anyone preparing the required transport assessment

Policy WA1 – Strategic Waste Management Sites

- Objections raised to the allocation of Colts Holm Road as there are alternatives
- Policy should be modified to identify Bletchley landfill site as a third potential option for the location of a strategic waste management facility (*omission site*)

Policy WA2 – Safeguarding existing and allocated sites

- Policy should be more specific about the type of facility envisaged and the alternative site reviewed on that basis

Policy WDC1 – Development Control Criteria

- How can criterion 1 be implemented and monitored?

Policy WDC2 – Environmental Objectives

- No comments received

Policy WDC3 – Transport

- Policy is more a matter of process than policy
- Policy would be strengthened by the inclusion of a policy or policy reference that ensures waste transport infrastructure, including sites for waste transfer and waste bulking facilities are safeguarded

Policy WDC4 – Restoration

- Policy is weakly worded, suggested change
- This is more a list of what the Council wants to avoid. A spatial approach could set out opportunities that restoration could create and the role of restored land

Appendix 1 - Respondents

RESPONDENT			
Mr	DJ	Bull	(received on March 2007)
Mr	TH	Grieveson	(received on March 2007)
Mr	AC	Keller	Building Tectonics Ltd (received on March 2007)
Mr	J	Dutton	(received on March 2007)
Mr	M E	Morris	(received on March 2007)
Mr	A J	Pollerd	Network Rail (received on March 2007)
Ms	P M	Furniss	(received on March 2007)
Mr	CG	Coppock	MKC (received on March 2007)
Mr	D	Bailey	Bedford Borough Council (received on 13 th March 2007)
Mr	David	Jones	Robinson & Hall LLP (received on 14 th March 2007)
Mr	David	Jones	Robinson & Hall LLP (received on 14 th March 2007)
Mr	A	Wood	Biffa (received on 15 th March 2007)
Mr	M	Salmon	GOSE (received on 13 th March 2007)
	C	Riddell	SEERA (received on 14 th March 2007)
Cllr	D	McCall	(received on 31 st January 2007)
Mr	C	Gallacher	Shenley Brook End Parish Council (received on 13 th March 2007)
Mr	Robin	Tetlow	Tetlow King Planning (received on 14 th March 2007)
	Victoria	Thomson	Aylesbury Vale District Council (received on 14 th March 2007)
Mr	G	Gittins	Natural England (received on 14 th March 2007)
	Hilary M	Saunders	Wolverton and Greenleys Town Council (received on 14 th March 2007)

Mr	Michael R	Abbott	Waste Recycling Group Ltd (received on 14 th March 2007)
Mr	R	Purton	David Lock Associates (received on 14 th March 2007)
Mr	L	Lean	(received on 14 th March 2007)
Mr	A	Mozley	Environment Agency (received on 14 th March 2007)
Cllr	Janet	Irons	Milton Keynes Council (received on 13 th March 2007)
	Jane	Hamilton	Milton Keynes Partnership (received on 14 th March 2007)
Mr	D M	Herd	Dreh Resources Ltd (received on 13 th March 2007)
	P M	George	(received on 12 th March 2007)
Mr	Ben	Harding	Sterecycle (received on 12 th March 2007)
Cllr	Jess	Holroyd	Milton Keynes Council (received on 12 th March 2007)
	Sravani	Vuppala	Faber Maunsell (received on 5 th March 2007)
Mr	Oswold	Haywad	(received on 16 th February 2007)
Mrs	Judy	Roberts	(received on 11 th February 2007)
Mr	Nigel	Richards	Hermitage Farm (received on 14 th March 2007)
Mr	Peter	Bloomfield	Moulsoe Parish Council (received on 14 th March 2007)
Mr	N	Barker	English Heritage (received on 19 th March 2007)
Mr	D	Kwiatkowski	West Bletchley Council (received on March 2007)
MR	F	Ugochukwu	Lakes Estate Residents Association (received on March 2007)

Appendix 2 – Summary of responses

The following list sets out a summary of the responses received.

The summary lists:

- Representor number
- Representation number
- Name
- Organisation
- Who the representation is on the behalf of
- Whether the respondent considers the strategy “sound” or “unsound”
- Relevant test of soundness
- Paragraph number
- Policy number
- Summary comments from the representation

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
1	1	Mr DJ Bull			Unsound	9			Objects to the Jacobs and Babbie Plan to allocate 1m cubic meters of London's waste to the Bletchley landfill site. An alternative method of disposal should be found.
2	2	Mr TH Grieveson			Sound	0			Concerns over wheelchair access to wheeled bins. This should be considered before the black sack collection is replaced.
3	3	Mr AC Keller	Building Tectonics Ltd		Sound	0			There is no mention of commercial waste. Recycling is almost impossible under the current system
4	4	Mr J Dutton			Unsound	7	A10		The site is too close to the City Centre and on the wrong side of the A5 for possible railway access
5	5	Mr M E Morris			Unsound	9			Objects to Milton Keynes Councils policy for no incineration. He states that this decision was taken some years ago when such plants were less efficient than they are today. The policy needs to be reassessed in the light of the latest developments in incineration techniques.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
6	6	Mr A J Pollerd	Network Rail		Sound	0			Network Rail does not consider the document to be unsound but reserves the right to comment on specific development applications, particularly those within 250 meters of Network Rail land.
7	7	Ms P M Furniss			Unsound	5	CS16		Lack of consideration of the impacts of the preferred site on Haversham residents in the Waste DPD. The existence of Haversham village and its proximity to the preferred site is not mentioned in the submitted document. Paragraph CS16 refers to adverse effects on the quality of life for nearby residents but nearby is not defined. Consideration of potential impacts on Haversham residents should be explicit in the document
7	8	Ms P M Furniss			Unsound	5			This objection is linked to the Ms Furniss' previous representation. The potential impacts on Haversham are noise, odour, visual impact, and traffic congestion. These should be included on page 34 as key criteria to be addressed for the preferred site.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
7	9	Ms P M Furniss			Unsound	7			The submission document selects a preferred site before the type of plant has been decided. How can a judgment be made as to whether this is 'the most appropriate in all circumstances' or if it is 'founded on a robust and credible evidence base, when only part of the plan is know? Without knowing the type of plant to be installed, how can these assessments be properly made?
8	10	Mr CG Coppock	MKC		Sound	0		WDC4	Policy WDC4 is weakly worded. Mr. Coppock suggests it should read "Proposals for the restoration will be permitted where they satisfy existing policies for "
9	11	Mr D Bailey	Bedford Borough Council		Unsound	4		WCS1	Policy WCS1 sets out the waste management capacity required to deal with locally arising waste. No allowance for London's waste is included. Failure to comply with RSS9.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
10	12	Mr David Jones	Robinson & Hall LLP	Mr Luke Stacey - A R Stacey & Son, Home Farm	Unsound	7	CS25, CS39 & CS47		Supports the aims of WDPD (CS39) for an in-vessel composting facility. However, they wish to clarify -1) That such a facility should be attached to an existing or new green waste composting facility in the locality.2) That food waste should be kept separate from green waste at the point of collection.
10	13	Mr David Jones	Robinson & Hall LLP	Mr Luke Stacey - A R Stacey & Son, Home Farm	Unsound	7		WDC2	They support the aim stated in CS47 for facilities to be located close to the source of waste to minimize road transport. Waste for composting produces fertiliser which will be spread on agricultural land. It is suggested that composting waste is best composted "on-farm" from where it can be spread directly onto the fields without the further transport. This is more sustainable than transporting the composted material out to rural areas. Policies should recognise this.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
11	14	Mr David Jones	Robinson & Hall LLP	Mr Hamer Jones - TH and AAY Jones - Dovecote Farm	Unsound	7	CS25, CS39, CS47		Supports the aims of WDPD (CS39) for an in-vessel composting facility. However, they wish to clarify - 1) That such a facility should be attached to an existing or new green waste composting facility in the locality. 2) That food waste should be kept separate from green waste at the point of collection.
11	15	Mr David Jones	Robinson & Hall LLP	Mr Hamer Jones - TH and AAY Jones - Dovecote Farm	Unsound	7	CS16, CS47	WDC2	They support the aim stated in CS47 for facilities to be located close to the source of waste to minimize road transport. Waste for composting produces fertiliser which will be spread on agricultural land. It is suggested that composting waste is best composted "on-farm" from where it can be spread directly onto the fields without the further transport. This is more sustainable than transporting the composted material out to rural areas. Policies should recognise this.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
12	16	Mr A Wood	Biffa		Sound	0			The authority/ DEFRA suggestion of joining with Northamptonshire is somewhat strange - would an alliance with Bedfordshire or Bucks be advantageous?
13	17	Mr M Salmon	GOSE		Unsound	8	CS38		The DPD does not have a clear approach to implementing and monitoring the use of biomass. It is suggested that the DPD could set out spatial actions that the council could use to bring forward Biomass schemes on its own and in partnership with others.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
13	18	Mr M Salmon	GOSE		Unsound	4	CS45, CS17	WCS1	Paragraph CS45 states that no provision will be made for London's waste in policy WCS1. This does not accord with alterations to RPG9 (June 2006) Policies W3 and W4, which state that capacity should be provided for dealing with waste from London. The approach also does not accord with paragraph CS17 of the Core Strategy. Policy WC31 does not accord with RSS and therefore does not comply with the advice is PPS12 (paragraph 2.10). In addition, PPS10 (paragraph 16) states that the core strategy should set out policies in line with the RSS. A change should be made in accordance with the above.
13	19	Mr M Salmon	GOSE		Unsound	07-Jan	A9		The DPD does not set out the circumstances that would result in a Reserve site being released to meet capacity requirements. A Policy approach could be set out in the core strategy to set out the circumstances that would result in the release of a reserve site, along with the relevant monitoring process.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
13	20	Mr M Salmon	GOSE		Unsound	9		WDC1	GOSE are unclear how this policy aspect could be implemented and monitored. It could go against natural justice with potentially individuals being treated differently by a public authority.
13	21	Mr M Salmon	GOSE		Unsound	4		WDC3	This policy appears to be a matter of process rather than policy.
13	22	Mr M Salmon	GOSE		Unsound	4		WDC4	The policy approach appears to set out what the Council considers it wishes to avoid. A spatial approach could set out opportunities that restoration could create and the role of restored land.
14	23	C Riddell	SEERA		Unsound	4			An issue of non-general conformity has been identified by the Assembly. The core strategy does not make provision for the disposal to landfill of a proportion of London's waste, as required by Policy W3 of RPG9 (June 2006), and insufficient evidence has been provided to justify this position.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
14	24	C Riddell	SEERA		Unsound	4		WDC3	To ensure alignment with Policy W16, it is recommended that policy WDC3 be strengthened by the inclusion of a policy or policy reference that ensures waste transport infrastructure, including sites for waste transfer and bulking facilities are safeguarded.
14	25	C Riddell	SEERA		Unsound	4	CS33 - 35		SEERA would expect to see policy provision for management of hazardous waste in the MK WDPD to address this policy gap in line with policy W15 of the draft South East Plan and RPG9 (adopted alterations). If hazardous waste policy is to be included in other DPD/ SPD's appropriate cross references must be made in the waste core strategy.
15	26	Cllr D McCall			Sound	0			Fully support the content of the WDPD

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
16	27	Mr C Gallacher	Shenley Brook End Parish Council		Unsound	7			On page 64 no evidence is given to justify why Milton Keynes Council policy opposes the use of mass burn incineration. Cost/ benefit analysis is needed to relate potential treatment options to fines and potential council tax increases. The need to evaluate new technologies is repeated elsewhere in the report (page 16) and a review of the 'no incineration' policy is needed. Incineration offers the potential of Energy from waste and careful siting of a plant could enable the MRF and EFW on the same site, reducing transport demand. Landfill sites have a very short future and alternative treatments will be essential within the life of the plan. It is inappropriate for the Council to commit to a negative policy at the outset of a 20 year plan, which could lead to loss of opportunity to introduce new technology in a timely fashion. This policy should be amended to require periodic review of new treatment methods.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
17	28	Mr Robin Tetlow	Tetlow King Planning	London and Cambridge Properties	Unsound	7		WA1	Objects to the allocation of Colts Holm Road as a new waste facility, as there are other more appropriate sites.
17	29	Mr Robin Tetlow	Tetlow King Planning	London and Cambridge Properties	Unsound	4		WA1	The document does not have proper regard to Policy E1 of Milton Keynes Local Plan
17	30	Mr Robin Tetlow	Tetlow King Planning	London and Cambridge Properties	Unsound	6		WA1	The Core strategy has not been finalised and so the DPD can not conform to it and is therefore premature.
18	31	Victoria Thomson	Aylesbury Vale District Council		Unsound	7			Final Treatment plant - The options for the reserve site (Garamonde Drive) refer only to a waste management facility, and in a way which can be interpreted as not including the final treatment plant. If the interpretation is that Colts Holm Road is suitable for final treatment, a clear and credible reserve is needed for final treatment provision.
18	32	Victoria Thomson	Aylesbury Vale District Council		Unsound	7			There is no reference to the collection of kitchen waste for composting which is currently taken to High Heavens at Wycombe. Aylesbury Vale's view is that it will need a treatment plant, and one which is compliant with the Animal Bi-product Regulations which provides 'in-vessel composting'. The authority objects to hauling Kitchen Waste from Milton Keynes through Aylesbury Vale.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
18	33	Victoria Thomson	Aylesbury Vale District Council		Unsound	4			London Waste - Aylesbury Vale are concerned that in the event that MKC is successful in resisting London's Waste, this merely moves the problem elsewhere. This could impact the Bucks Waste Strategy. Aylesbury Vale are also concerned the Bletchley Landfill site is only served by road and the lack of detail as to how the site will be safeguarded for even MK waste.
18	34	Victoria Thomson	Aylesbury Vale District Council		Unsound	7			There is no mention of the possible 'overspill' growth from MK into the Newton Longville area, and where that waste would go. It would seem logical to consider whether waste from the expanded Newton Longville area should be treated in the MK area where the facility is close at hand. This potential conflict between the growth of MK into the Aylesbury Vale District and the principle of net self-sufficiency was raised by AVDC at the Preferred Options Stage. It was suggested, in the long-term, waste arising from this may be dealt with in MK outside the net self-sufficiency vision.
19	35	Mr G Gittins	Natural England		Sound	0			Support the content of the WDPD

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
20	36	Hilary M Saunders	Wolverton and Greenleys Town Council		Unsound	7			The views of members of the Old Wolverton Residents' Association at a meeting with Milton Keynes Council Officers were not sufficiently taken into account. Only 9 objections were reported. The concentration of the facility on one site is 'placing all our eggs in one basket'. The parish council suggest using smaller sites to serve the two halves of Milton Keynes. Another concern is that the plant seems to be getting the go-ahead without the type of treatment that will occur on the site being determined. The parish council also suggest the facility will place more strain on the road network, especially the Old Wolverton Road. The best option for a waste treatment plant would be to locate it in a new growth area of the city where the roads are carefully designed to cope with additional traffic congestion caused by the Waste Facility. Site F is a choice of site that does not sufficiently take into account the Development Control Committee's approval of 400 new homes in Old Wolverton.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
21	37	Mr Michael R Abbott	Waste Recycling Group Ltd		Unsound	4	CS22, A18		<p>The text should be changed to:</p> <p>1) Acknowledge that Bletchley Landfill Site will shortly be accepting substantially increased imports from outside the Milton Keynes area, including London, in accordance with the planning consent granted by the Council in 2002.</p> <p>2) Recognise that in accordance with emerging regional policy Milton Keynes will be expected to continue to receive a proportion of London's waste throughout the Plan period, albeit the actual level of the apportionment is still a matter of debate.</p> <p>3) Reflect the fact that the importation of waste from outside the Borough is not inconsistent with the need to ensure provision for Milton Keynes' own landfill requirements throughout the Plan period</p>

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
21	38	Mr Michael R Abbott	Waste Recycling Group Ltd		Unsound	7		WCS2, WA1	<p>1) It is proposed that WA1 be modified to identify Bletchley Landfill site as a third potential option for the location of a strategic waste management facility. As a site that clearly might be suitable, there is no logic in excluding it from the options at this stage. It would satisfy commercial and environmental requirements.</p> <p>2) Policy WCS2 should be more specific about the type of facility envisaged and the alternative sites reviewed on that basis. However, expanding the number of options will at least increase the likelihood of an appropriate solution.</p> <p>It is considered that the change is necessary to make the Plan more robust and achievable, in accordance with the guidance in PPS 10, by increasing the range of sites available for a primary treatment facility.</p>

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
22	39	Mr R Purton	David Lock Associates		Unsound	7	CS31, CS32		<p>Incorrect wording of references to the Brooklands Ridge.</p> <p>They recommend the following - Delete reference to Brooklands Ridge from Figure W1 Item 8, page 17; Delete reference of Brooklands Ridge from Figure W1 "Current Waste Sites in Milton Keynes"; Reword and merge paragraphs CS31 and CS32 to form a new paragraph (As stated in full on written representation)</p>
22	40	Mr R Purton	David Lock Associates	The Brooklands Consortium (Hallam Land Management, William Davis Limited and TGR Williams & Son)	Unsound	7	CS31, CS32		<p>Incorrect wording of references to the Brooklands Ridge.</p> <p>They recommend the following - Delete reference to Brooklands Ridge from Figure W1 Item 8, page 17; Delete reference of Brooklands Ridge from Figure W1 "Current Waste Sites in Milton Keynes"; Reword and merge paragraphs CS31 and CS32 to form a new paragraph (As stated in full on written representation)</p>

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23	41	Mr L Lean			Unsound	7		WDC3	Imposes unnecessary requirements on anyone preparing the required transport assessment, therefore all reference to rail, canal, conveyor, pipeline as an alternative to road transport needs to be deleted.
24	42	Mr A Mozley	Environment Agency		Sound	0			Support the content of the WDPD.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
25	43	Cllr Janet Irons	Milton Keynes Council		Unsound	7			<p>Cllr Irons feels states that the consultation process has been flawed in that not enough notice has been taken of the responses from the people of Old Wolverton.</p> <p>Cllr Iron fully accepts that a site is needed for Milton Keynes but feels that the Council has taken insufficient notice of local conditions when deciding on this option.</p> <p>Not enough account has been taken of the proposals to build 95 dwellings, in the area known as Electric Park, and 300 dwellings being built in Railway Park. Both sites are adjacent to the Old Wolverton Road.</p> <p>The Cllr disagrees with the 5 allocated to the Colts Holm Road site in the Transport and Access Suitability criteria. (See accompanying diagram).</p>

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26	44	Jane Hamilton	Milton Keynes Partnership		Unsound	7			<p>Brooklands Ridge</p> <p>The Ridge was approved in principle by the MKC Planning Sub-Committee on 11th October and consent is due to be issued in the near future following the signing of a section 106 Agreement.</p> <p>The Ridge has a capacity to accommodate approximately 408,000 cubic meters of clean inert material which will be sourced from the Eastern Expansion Area and other sites primarily from the Milton Keynes area. In light of this and the planning background above, it is not considered appropriate to refer to the Ridge as an inert landfill site as it does not have permission for general landfill.</p> <p>Further information should be given to prevent any confusion about its status within the document.</p>

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
27	45	Mr D M Herd	Dreh Resources Ltd		Sound	5	CS35	WCS1	<p>CS35 indicates that hazardous waste is transported away from Milton Keynes because it needs large specialised facilities. This is not the case, as Advanced Thermal Processes with energy recovery can be economic from about 600 tpa using proven pyrolysis.</p> <p>Dreh Resources Ltd are proposing an advanced thermal process that will be located in an existing B2 building on an industrial estate in North MK and consistent with CS47 and CS48.</p> <p>CS17 points out that a planning approval has previously been made for a clinical waste processing plant at Lyon Road, Bletchley, but was never put into operation.</p>

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28	46	P M George			Unsound	7		WDC2(a)	Mass burn incineration has been excluded from consideration for no good economic or ecological reason. This option (with associated energy from waste recovery) should be evaluated on equal terms with other processes.
28	47	P M George			Unsound	6			The apportionment of London Waste to be dealt with here conflicts with the policy of disposing waste near to its source. All London waste should be processed within the London boundary and only treated waste transported elsewhere.

Representor No	Representation No	Name	Organisation	Representing on behalf of	Is the DPD 'Sound' or 'Unsound'?	Test of Soundness No.	Paragraph No.	Policy No.	Representation Summary
29	48	Mr Ben Harding	Sterecycle		Unsound	7			<p>Information contained on Autoclaving as a waste treatment solution is incorrect.</p> <p>Autoclaving has been used as a method for treating municipal waste for several years in the US. Sterecycle firmly believes that autoclaving will form a major part of the solution to the municipal waste problem in the UK going forward. The Sterecycle process, delivered waste is not sorted or shredded prior to loading into the autoclave vessels.</p> <p>Plastic deformation does not happen to the extent whereby dense plastics are deformed making them difficult to separate and market. Sterecycle is currently in the process of constructing its first full-scale facility in the UK.</p> <p>Therefore, the position of the Autoclave information on page 65 of Appendix 3 is extremely misleading. Autoclaving should sit above MBT since the "floc" from an MBT process is generally contaminated with plastics, whilst the Autoclave fiber is 98% biomass and has many more uses.</p>

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30	49	Cllr Jess Holroyd	Milton Keynes Council		Unsound	7	A6, DC6, DC7, DC10		<p>A6 states the nearest residential properties are approx. 400 meters away. However, Planning permission had been received for 300 new dwellings and a commercial conversion at Wolverton Park whose access is 100 meters from the entrance to Colts Holm Rd.</p> <p>Permission is also due to be granted for a further 95 residential and 3 office units on the former EMEB site, which is closer to Colts Holm Rd than the Galleon Estate. This will produce increased traffic on the Old Wolverton Rd.</p> <p>Both of these developments should be taken into account when assessing the suitability of the proposed site.</p> <p>DC6 States that 'HGV movements should generally be restricted to the primary road network'. No one would consider the Old Wolverton Rd to be an acceptable part of the network.</p> <p>DC7 pays lip service to the use of rail and water in preference to road. The associated cost of building such facilities would be too high.</p> <p>DC10 - The proposal fails the criteria laid down for any Transport Assessment.</p>

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31	50	Sravani Vuppala	Faber Maunsell	Highways Agency	Sound	0			<p>Policies are generally reflective of current and emerging HA DC Policy.</p> <p>The Highways agency wishes to be consulted on any waste development site proposals coming forward to support the WDPD.</p>
32	51	Mr Oswald Haywad			Unsound	7			Supports incineration
33	52	Mrs Judy Roberts			Sound	0			Wishes to be involved with the implementation of the WDPD core strategy if the document is approved.
34	53	Mr Nigel Richards	Hermitage Farm		Unsound	7			Opposes Milton Keynes Council's anti incineration policy. The councils opposition to incinerators is misplaced in logical terms.

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35	54	Mr Peter Bloomfield	Moulsoe Parish Council		Unsound	7	CS31,32,37,38,43,45		<p>Existing landfill capacity should be managed to last as long as possible. Para CS31 is incorrect.</p> <p>Restoration of quarries should be considered a greater priority than landraising. Although Landraising should still be adopted where appropriate.</p> <p>It is inadequate to further monitoring will identify any future need and will be considered under D.C Policies. Extra provision should be made now.</p> <p>The Calculation of generated volume is difficult. Precise data on inert wastes are notoriously hard to acquire.</p> <p>Development outside the area should be noted as it may lead to greater than expected inert waste generation in London than can be absorbed there.</p> <p>MK needs to provide spare disposal capacity or developers will be faced with unnecessarily expensive tipping charges.</p> <p>They support CS37, 38 and 39. Ref. CS45 - It is important for authorities with potential spare capacity to allow it to be used by those without e.g. London.</p>

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36	55	Mr N Barker	English Heritage		Sound	0			No comment
37	56	Mr D Kwiatkowski	West Bletchley Council		Unsound	7	CS11		<p>1) Little mention of waste minimisation. Could have a significant impact on collection and disposal requirement.</p> <p>2) Waste Strategy requires a much wider brief.</p> <p>3) The WDPD did not raise the topic of making adequate provision for the recovery of waste.</p>
38	57	MR Ugochukwu	Lakes Estate Residents Association	Ms. Jeanette Marling	Unsound	7			Suggests abandoning the Bletchley Landfill site because of the noise and pollution.

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Appendix 3 - Notice of Pre-Examination Meeting

Milton Keynes Waste Development Plan Document Submission 2007 – 2026

On the 18th July 2007 at 2pm a pre-examination meeting is being held to plan the examination of the Milton Keynes Waste Development Plan Document. On the 31st January 2007 the document was submitted for examination and people were invited to make comments, known as representations, in writing to the council. At the examination the Planning Inspector will assess whether the document has been prepared legally and is 'sound'.

The pre-examination meeting will identify the main areas to be examined and a timetable will be produced for the Examination. The meeting will be held at:

**Meeting Room 2
The Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3HQ**

Please contact the Programme Officer, Jamie Chalmers, if you wish to attend or have any queries. He can be contacted at –

Civic Offices
PO BOX 5499
Milton Keynes
MK9 3XH



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For more information on the document and examination process visit
http://www.milton-keynes.gov.uk/local_plan_review/

