

Buckinghamshire Minerals and Waste Local Plan

Preferred Options (Draft Plan) Schedule of Responses

The schedule of responses is set out in the following order, based on the key questions asked at the Preferred Options (Draft Plan) stage:

Minerals provision

- Future mineral requirements
- Adequacy of provision

Mineral allocations.

- Primary and secondary areas of focus
- Acceptability of the proposed mineral sites
- Other suitable locations

Mineral safeguarding

- Identification of areas
- Criteria for compliance with Policy 1
- Policy 1 improvements

Waste

- Focusing waste management around the main urban areas
- Employment areas and new development for the area of focus within Policy 14
- Other suitable sites for waste management

About the plan

- Vision and objectives
- Section 7

Further comments

Within each sub-section of the schedule responses are listed in the following order: private individuals, local residents and amenity groups, town and parish councils, district councils in Buckinghamshire, other planning authorities, government and other agencies/organisations, the minerals and waste industry/agents and county and district councillors.

The right hand column of the schedule contains the planning authority's comments on either the general response or on the individual representations making up the response. Where it is proposed to amend the emerging MWLP or one of the accompanying documents as a consequence of the representation made this is highlighted through grey shading; detailed wording changes are in grey typeface.

Abbreviations used: BGS (British Geological Society); NPPF (National Planning Policy Framework); WNA (Waste Needs Assessment).

Minerals provision

Do you agree with how we have calculated future mineral requirements? If not, why not?			
<i>Respondent</i>	<i>Agree with provision figure</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	Yes		
Peter Brogden	No	The ten year historical average is unduly influenced by sales in the first 2 years, 2006, 2007. Demand has been significantly lower in every year since. The three year average of 0.73Mt is a better representation (a 5 year average is 0.71Mt). Economic activity in the short and medium term is highly likely to be subdued, if not actually in recession. The availability and use of recycled materials is increasing and the improvements in rail infrastructure could make importation of dredged aggregates more economically viable. All these factors combine to suggest a much reduced future requirement for local extraction.	The ten years figure is supposed to be long enough to pick up fluctuations in sales through periods of economic growth and economic contraction and should be taken as the main consideration. The three year figure (which also has to be considered) is showing an upward trend anyway and there are construction programmes due to be implemented that will also probably increase demand, therefore going with a ten year figure with no upward or downward adjustment is considered appropriate. Provision figures in minerals local plans are, due to national guidance, based on sales from land won sources and on sales from the mineral planning authority area over the ten year period - recycled materials and imports are not factors to consider as they are not land won.
K Charman	Yes		Noted.
Zoe Davis	No	This is not needed, there are alternatives and ruining a village just for sand and gravel is not acceptable.	Alternative aggregates (i.e. secondary and recycled) cannot be used to replace primary (land won) aggregates in all circumstance; hence the extraction of primary aggregates is required to support growth. National policy states that minerals are essential to support sustainable economic growth and our quality of life, and that mineral planning authorities should identify and include policies for extraction of mineral resource of local and national importance in their area (refer NPPF para 142-3).
Mr D Fettes	No		As no detail regarding why the identified mineral requirements are not considered appropriate has been provided the Council is unable to provide a detailed

			response. The Draft Plan and associated evidence base documents set out the reasoning for the identified provision rates and areas of focus.
D Harvey	No	I think it is an over estimate given the future efficiencies in using resources and a long term slower economy due to Brexit.	The extent to which future efficiencies and economic impact of Brexit is not known and so the provision rates have been derived from local data as per national policy and guidance.
Mr and Mrs Lawani	No	<p>Please refer to the email from Hedgerley Parish Council to Mr A Sierakowski dated 10th August 2017 – I refer to the above application and now write to confirm that Hedgerley Parish Council strongly objects to application number CM57/17. Application CM/57/17 is a resubmission of planning application CM59/15 which was refused by the County Council on 10th August 2016. The applicant has confirmed in correspondence with Hedgerley Parish Council that the development now being proposed at Slade Farm has not materially changed relative to the previous planning application. It follows that Hedgerley Parish Council wishes to maintain its original objections on the grounds set out in the attached documents produced on its behalf by AECOM namely:</p> <p>Report and accompanying letter to Buckinghamshire County Council (BCC) dated 16th November 2015</p> <p>Rebuttal document and accompanying letter to BCC dated 5th May 2016 and</p> <p>Hearing statement submitted to PINS dated 8th May 2017.</p> <p>In maintaining this position, it is acknowledged that there have been important changes since the original application was determined:</p> <p>a. The publication of the latest Local Aggregate Assessment (LAA); and</p> <p>b. the publication of the BCC draft Minerals and Waste Local Plan.</p> <p>Local Aggregate Assessments</p>	<p>Noted. However this is a response related to the planning application rather than on the MWLP. Nevertheless the comments in respect of maintaining a adequate and steady supply and taking account of the LAA are important considerations in relation to determining planning applications at this location. It should be noted that as the MWLP progresses towards adoption both the stage the plan is at and the evidence base that underpins the plan preparation can be a material consideration.</p>

		<p>At the time when the first application was submitted, the most up to date LAA was for the period up to December 2013 (published in 2014). This confirmed that based on the average sales for the 10 year period up to December 2013, the sand and gravel landbank in Buckinghamshire stood at 10.05 year.</p> <p>The document also confirmed that based on the average sales for the 3 year period up to 31st December 2013, the sand and gravel landbank, Buckinghamshire stood at 12.88 years.</p> <p>The most recent LAA published in February 2017 cover the period to 31st December 2015. This document confirmed that based on the average 10 year period up to December 2015, the sand and gravel landbank stands at 11.3 years. The document confirms that based on average sales for the 3 year period up to 31st December 2015, the sand and gravel landbank in Buckinghamshire stands at 12.38 years.</p> <p>The figure indicate that <i>“the earliest that the landbank would fall below the 5.6mt of the 10 year rolling average requirement for 7 year landbank (based on the year average of sales) would be between 2019 and the earliest it would fall below a 5.11 mt requirement (based on the 3 year average of sales) would be 2020.”</i></p> <p>In summary, the sand and gravel landbank in Buckinghamshire as reported in the latest LAA (as well as previous years) is sufficient. In addition, the more recent and pending decision reports in the LAAs appear likely to maintain that position for some time. Therefore it follows that this is no overriding requirement to grant permission for sand and gravel extraction at Slade Farm based on the need to maintain “adequate and steady provision”.</p> <p>Emerging Minerals and Waste Local Plan Since the second planning application has been</p>	
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M Newey	Yes		Noted.
M & K Orchard	No	<p>The ten year historical average is unduly influenced by sales in the first 2 years, 2006, 2007. Demand has been significantly lower in every year since. The three year average of 0.73Mt is a better representation (a 5 year average is 0.71Mt). One also has to fully take into account the gravel that will be extracted and used when local infrastructure projects are being completed, to prevent sterilisation. This means the projects running through Bucks will not require additional resource.</p>	<p>Please refer to planning authority response in relation to response made by Peter Brogden as above.</p> <p>Aggregate extraction resulting from prior extraction/borrow pits related to major construction/engineering works are treated as windfall. The amount contributed by such windfalls over the plan period cannot be known and is not built into the plans provision, as such the plan must still seek to provide for a steady and adequate supply of aggregates.</p>

Mr D Ward	Yes		Noted
Mrs S Ward	Yes		Noted
Buckingham Canal Society	Yes		Noted.
Aston Clinton Parish Council	Yes		Noted
Buckingham Town Council	Yes		Noted.
Gawcott with Lenborough Parish Council	Yes		Noted.
Gerrards Cross Town Council	No	We would question the requirement for this plan that was created before the Brexit decision when central government expected a substantial increase in immigration that has not and will not materialise. It is also dependent on the building of the Heathrow 3 rd runway, which may not occur. It is not BCC's duty to provide minerals for HS2, which has no benefit whatsoever to the residents of Bucks, whom they represent.	The plan meets national guidance by basing aggregates provision in the southern part of the county on ten year annual average sales. Provision for minerals is not dependent on levels of immigration. This Plan makes no assumptions about Heathrow expansion as the details of this development is not yet known- the plan may need reviewing once this is known in a few years time.
Hedgerley Parish Council	No	The ten year historical average is unduly influenced by sales in the first 2 years, 2006, 2007. Demand has been significantly lower in every year since. The three year average of 0.73Mt is a better representation (a 5 year average is 0.71Mt).	Please refer to planning authority response in relation to response made by Peter Brogden as above.
Iver Parish Council		It is impossible for someone not closely involved in the process to make a sensible comment on this point.	The draft plan has been produced (and consulted on) in accordance with national requirements. This appears to be a statement referring to the plan-making process, rather than the content of the MWLP/evidence base documents.
Radclive cum Chackmore Parish Council	Yes		Noted.
Chiltern and South Bucks District Councils		The vision for the MWLP seeks the efficient provision and use of primary minerals for future use by conserving mineral resources, and states an intention to meet the needs of various levels of planned growth in different parts of the county in ways that contribute toward the efficiency of the County's transport and infrastructure	The MWLP has to include a defensible figure for the amount of sand and gravel to be provided over the plan period. Just because this figure is not the same as the most recently published LAA clearly does not make it non-compliant with the NPPF. The Briefing Paper on Minerals Provision that accompanied the Preferred Options document explains the position.

		<p>networks. The Councils have concerns that the strategy as currently drafted would not deliver this vision, for the reasons set out below.</p> <p>The National Planning Policy Framework (NPPF) stresses the importance of securing the long-term conservation of minerals as a natural, finite resource. It sets out the basis for determining the amount of aggregates that Minerals Planning Authorities should plan for through their local plans, based on a 10 year average of sales data and giving consideration to any local circumstances. This should be set out by each Minerals Planning Authority in an annual Local Aggregates Assessment (LAA). The most recent LAA for Buckinghamshire identifies an annual supply requirement of 0.81mtpa across the county.</p> <p>However, the draft MWLP appears to be planning for more aggregate than required by identifying two separate supply requirements; 0.81mtpa from a primary focus area in the south and 0.12mtpa from a smaller secondary focus area in the north. This totals an annual supply requirement of 0.93mtpa across the county, which is in excess of that identified in the LAA as necessary to maintain a steady and adequate supply of aggregate. This approach appears to be a departure from the NPPF, and does not contribute towards securing the long-term conservation of mineral resources.</p> <p>The MWLP states that the split provision approach supports a ‘balancing’ of supply of aggregates between the primary focus area of the Thames Colne Valleys in the south of the county and deposits in the Great Ouse Valley in the north of the county as a secondary focus area. The Councils support the principle of a secondary area of focus for minerals extraction in the north of the county, as this could provide</p>	<p>The secondary area was identified by analysing BGS layers and current/planning growth patterns/areas. The role of the spatial strategy is not to simply identify all mineral resources in the area but to guide development to those areas that are considered to best relate to land use patterns and current/future growth (i.e. where demand for such mineral may come from).</p> <p>The identification of a secondary area of focus for mineral extraction is likely to be beneficial with respect to sustainable transport movements as extraction of mineral from within the county’s north would reduce transport from the south or from other MPA areas, thereby reducing transport miles. Detailed assessment of transport impacts is normally undertaken in relation to site-specific applications – at this level (i.e. spatial strategy) it is more difficult as all of the sites that would come forward in the future within the secondary area are not known (except for one proposed for allocation for which an appropriate and proportionate assessment has been undertaken).</p>
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		<p>for the amount of aggregates necessary to maintain a steady supply through the provision of only the annual supply requirement for the county as a whole. As drafted, the MWLP plans for an excess of this figure and therefore places unnecessary strain on the South Buckinghamshire area. Issues associated with restoration may be less of a problem in the north of the county where there may be other suitable restoration solutions (e.g. lakes) or wider access to inert fill opportunities.</p> <p>The Councils have, under the Duty to cooperate, sought to understand the County reasoning for focussing development in the south of the county and limiting opportunities in the north of the county. It is understood that the County Council is seeking to identify opportunities for sand and gravel extraction that have been traditionally brought forward by the market. This is reinforced by the level of committed extraction in the south of the county for over 11 years of supply.</p> <p>It is considered that the County Council has a plan-led opportunity to promote the more sustainable extraction of sand and gravel in Buckinghamshire by identifying alternative extraction opportunities in the north of the county (closer to major development, in an area of less HGV traffic implications and potentially better restoration outcomes/solutions). The level of committed reserves in Buckinghamshire enables a change in plan-led development, allowing the industry time to respond positively and to secure a more sustainable outcome.</p>	<p>allocation. In addition some soils/excavation materials are retained on-site and used to fill, it should also be noted restoration may include water bodies as part of a mosaic of habitats and re-profiling to lower levels may occur. The emphasis at this point in the plan-making stage given the above matters is to ensure that the plan includes robust policies to ensure that inert waste fill/recovery is focussed on restoration of quarries and not other sites (where this would prejudice restoration of quarries) this is achieved through the plans policies - Policy 11 and Policy 13.</p>
Wycombe District Council		<p>We have reviewed the proposals for minerals extraction over the plan period and the proposed retention of the existing minerals safeguarding area. We have no comments to make at this time regarding this part of the plan.</p>	<p>Noted.</p>

Oxfordshire County Council		<p>Soft Sand Paragraph 33 in the Briefing Note on Minerals Provision states that 'it is not a national requirement for soft sand provision to be separately identified.' However, this appears to be contrary to NPPF paragraph 145, final bullet which states that 'Minerals planning authorities should plan for a steady supply of aggregates by: Calculating and maintaining separate landbanks for any aggregate materials of a specific type or quality which have a distinct and separate market.' Soft sand, or building sand is used in applications such as for mortar render, and cannot be substituted by sharp sand. Therefore it would appear that, if possible, landbanks for these aggregates should be identified separately.</p> <p>Sand and Gravel The conclusion section of the LAA 2015 does not appear to conclude on the amount of provision to be made for sand and gravel in the County. However, the information in the report suggests that there are no local factors that would require a deviation from the 10 year average of sales (0.81mtpa) as the basis of provision for sand and gravel. However, it is noted that the draft plan appears to set a level above the 10 year sales average for sand and gravel (0.93mtpa). This includes provision of the 10 year average from the primary area of focus in the Thames/Colne Valleys, and an additional 0.12mtpa in the secondary area of focus in the Ouse Valley. It is also noted that the reasoning given in the briefing note on mineral provision appears to be driven by the desire to achieve a balance in production between the North and South of the</p>	<p>If soft sand was picked up by para 145 final bullet point then all plans would have a separate soft sand provision figure - however this is not the case. There is insufficient evidence available at a local level to determine a provision rate and identify soft sand resources and/or specific sites to maintain a separate landbank for soft sand. Oxfordshire would be aware of the South East England Aggregates Working Party (SEEAWP) Statement of Common Ground on soft sand. Refer to Figure 2 of this document, which indicates that soft sand resources within Buckinghamshire are very limited. The Briefing Note also explains how a separate soft sand figure could detract from overall provision if it was applied in Buckinghamshire.</p> <p>It is not for the LAA to determine the provision to be made through the plan. This is the role of the plan-making process. The plan includes a split provision with provision based on an average of ten years sales (0.81Mtpa) for the Thames and Colne Valleys, and a separate provision from the Great Ouse Valley of 0.12Mtpa. A split provision is not an uncommon approach regarding MWLPs. It is correct that the plan seeks to provide a balance in provision across the county, this also relates to reducing reliance on imports and sustainable transport matters. It is unclear what, if any, concerns the respondent is raising in relation to this matter.</p>
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		County.	
West Berkshire Council		Using a ten-year sales average figure to calculate the aggregate need over the plan period is considered appropriate. It is noted that no soft sand sites have been allocated due to the industry not submitting any sites for consideration during this plan period.	The ten year sales figure has been applied to the Thames and Colne Valley area (from which extraction, and previous sales, have come). There is insufficient evidence available at a local level to determine a provision rate and identify soft sand resources and/or specific sites to maintain a separate landbank for soft sand.
Brett Aggregates	No	The Plan takes no account of the NPPF in requiring a minimum 7 year landbank throughout the plan period. There should be an allowance of 7 years landbank at the end of the Plan period in order to comply with the NPPF Policy.	Refer Policy 3 which states “The maintenance of a landbank for sand and gravel equivalent to at least seven years supply will be sought in order to ensure a steady and adequate supply.” It is considered there is no need to provide for allocations for a seven year landbank period beyond the end date of the MWLP. There is strong government support to regularly review plans and as part of this it is very likely that key elements such as provision rate and allocations would be reviewed as appropriate.
CEMEX		CEMEX support the provision of sand and gravel from the Thames and Colne Valleys based on the ten year average of 0.81mt rather than the 3 year supply of 0.73mt. CEMEX welcome the identification that the plan needs to make provision for an additional 7.97mt of sand and gravel from the primary area, currently. CEMEX welcome the provision of 2.52mt of sand and gravel from the Great Ouse Valley. CEMEX consider that if this provision is required and the need not met from sites within this area. Buckinghamshire County Council should consider making up any shortfall in the 2.52mt provision from granting planning permission for additional reserves from the Thames and Colne Valley area. Paragraph 4.38 CEMEX note that the plan makes no provision for at least 7 year landbank at the end of the plan period in 2036. CEMEX would prefer that this provision is made as it can	The MWLP has specifically identified separate provision figures for the Thames/Colne Valleys and the Great Ouse Valley to prevent provision being re-apportioned between these areas. The Briefing Note on Minerals Provision accompanying the Preferred Options MWLP explains the rationale for split provision. It is considered there is no need to provide for allocations for a seven year landbank period beyond the end date of the MWLP. There is strong government

		<p>take a number of years to review and prepare a new minerals plan and Buckinghamshire is expected to have a number of infrastructure and housing projects which require aggregates which is going to put pressure on supply. However, if this provision is not made and the plan not reviewed sooner than 2036 CEMEX would expect Buckinghamshire County Council to grant planning permission for suitable quarry applications which come forward towards the end third of the Plan's life to ensure that a steady and adequate supply of minerals is provided for, even if this exceeds the 19.53mt Plan provision. CEMEX would welcome additional wording added to this section of the plan to reflect this.</p> <p>CEMEX note the surplus provision in the allocation of sites which may go some way to allaying this concern, but CEMEX also consider that productive capacity plays an important role in ensuring a steady and adequate supply of minerals throughout the lifetime of a plan and have made comment about further analysis on this as the end of this letter.</p> <p>Policy 3 – Sand and Gravel Provision CEMEX would welcome some wording within this policy or the supporting text to reflect that if no sites come forward to provide for the 0.12mtpa of sand and gravel from the Great Ouse Valley any shortfall will be made up by granting planning permission for these reserves from within the primary focus area i.e Thames and Colne Valleys.</p>	<p>support to regularly review plans and as part of this it is very likely that key elements such as provision rate and allocations would be reviewed as appropriate.</p>
Quattro	No		<p>As no detail regarding why the identified mineral requirements are not considered appropriate has been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identified provision rates and areas of focus.</p>

<p>Summerleaze</p>		<p><i>Page 25, paragraph 4.30</i> – the annual provision for sand and gravel in the Thames and Colne Valleys area is identified as 0.81million tonnes per year although it is understood that production from this area was over 1.0 million tonnes in 2016 and is also likely to be in excess of 0.81 million tonnes in 2017. There is no current production in the Great Ouse area and it is unlikely that any production will occur in this area for a number of years. Therefore the annual provision from the Thames and Colne Valleys area must be increased beyond 0.81 million tonnes per year as there is a clear demand for more material from this area. If production from the Thames and Colne Valleys area continues to be in excess of the provision additional sand and gravel allocations will undoubtedly be required during the Plan period.</p> <p><i>Page 26, paragraph 4.36</i> – paragraph 4.36 refers to soft sand and states that no provision for soft sand has been made and if it had it would have been at the expense of reducing the general sand and gravel provision by the same amount. This is relevant when considering the existing sand and gravel landbank and the Denham Park Farm site which is primarily a soft sand site as referred to below in comments on paragraph 4.45.</p> <p><i>Page 26, paragraph 4.37</i> – reference is made to government guidance for sand and gravel landbanks of at least seven years to be maintained. The Plan does not maintain a landbank of at least seven years at the end of the Plan period and therefore does not comply with government guidance.</p> <p><i>Page 28 Policy 3 Sand and Gravel Provision</i> – Policy 3 contains a commitment to providing sufficient sand and gravel over the Plan period</p>	<p>There is no robust evidence to support an increase (or decrease) from the ten years average sales figure of 0.81Mtpa for the Thames and Colne Valleys. The provision rate should be based on a ten year annual average provision rather than on the most recent year and it is not clear that there will be a continuing upward trend in sales- for example as of late October 2017 the construction industry is in recession according to official figures. Indeed the purpose of a ten year provision period was to account for periods of both economic growth and economic difficulty. The MWLP uses this figure and therefore does not suggest a reduction, indeed the figure for the whole plan area is greater than a ten year provision figure because of the provision to be made for the Great Ouse Valley secondary area of focus.</p> <p>Denham Park Farm is not primarily (or even secondarily) a soft sand site.</p> <p>Neither the NPPF nor NPPG stipulate that the plan must identify a specific provision or surplus/reserve sites in order to ensure landbanks at the end of the plan period. The plan period is up to 2036; it is reasonable to assume that, in line with the requirement to maintain an up-to-date plan, the plan will be reviewed well before this end date. Accordingly the end date of the plan may be extended and/or allocations reviewed (with new allocations made where appropriate) in line with any revisions to the provision</p>
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		<p>to maintain a landbank of at least seven years. The policy is not being met as referred to elsewhere in this document because there is no landbank at the end of the Plan period of at least seven years. Further resources of sand and gravel need to be identified.</p> <p><i>Page 28, paragraph 4.45</i> – this paragraph identifies the existing sites with planning permission which make up the 9.04 million tonnes of sand and gravel. Denham Park Farm is identified as one of the sites. It must be noted that Denham Park Farm is primarily a soft sand site. The site contains a limited amount of hoggin material with a high silt content that is transported off-site for processing. Most material at the site is a fill sand. The site should not be included within the sand and gravel landbank as it does not contain comparable high quality material and consequently the reserves at the site of 1.2 million tonnes should be reduced or removed from the sand and gravel landbank calculation. Additional resources of sand and gravel need to be allocated to meet the landbank reduction due to the removal of the Denham Park Farm soft sand.</p> <p><i>Page 29, Paragraph 4.46</i> – this paragraph refers to the Springfield Farm South Extension of 2 million tonnes. It is unrealistic to include the entirety of the extension to the Springfield Farm site because the output from the site is limited to 250,000 tonnes per year and the site already has over 3 million tonnes of permitted reserves. The existing reserves would be sufficient to last until beyond 2030 and the extension area would extend well beyond the end of the Plan period and therefore should not be included in the Plan period provision. See comments below on</p>	<p>rate and landbank levels through a future review/partial review of the MWLP.</p> <p>The plan does not make a separate provision for soft sand. A range of aggregate types, characteristics and qualities is required to support growth. Separating out the provision based on quality is not seen as appropriate or necessary. If a site is being delivered it is an appropriate site that contributes to provision.</p> <p>The site assessment states that it would likely be worked in the long term following completion of existing operations to the north (which has a planning permission end date of 30 Sept 2029 and an annual limit of 0.25Mtpa). The extension to the south is likely to be phased to come online as the north site winds down to ensure continuity of supply, this is likely to take the site beyond the plan period. The text will be amended to clarify this point.</p> <p>4.47 The MWLP carries forward the remaining allocation from the BMWLP 2006 south of Springfield</p>
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		<p>paragraph 4.53.</p> <p>Additional resources of sand and gravel need to be allocated to meet the landbank requirements during the Plan period.</p> <p><i>Page 29, paragraph 4.51</i> – planning permission for the extraction of 2 million tonnes of sand and gravel from North Park (Iver) has recently been granted to ensure that the Western Rail Link (WRL) to Heathrow was not prevented. The North Park mineral resources are included in the Plan allocation, however it is considered highly unlikely that the sand and gravel will be extracted before the WRL development proceeds and will be sterilised. Some or all of the allocation should be removed.</p> <p>The timetable for the commencement of the WRL development on the North Park site is Spring 2019. The site contains 2.0 million tonnes of sand and gravel which would be extracted at the rate of 400,000 per year for five years commencing in 2018. No development works have commenced on site and the reserved matter planning schemes that would allow commencement have not all been provided or approved. It is considered impossible to extract more than 400,000 tonnes of sand and gravel</p>	<p>Farm, Beaconsfield. The northern part of this allocation has planning permission and is being extracted from, but the area to the south containing 2Mt of resources does not. It is anticipated that this area may come forward following extraction from the northern committed areas. <u>It is anticipated that the northern committed area will be worked out in the last quarter of the plan period, with the south extension phased to come online to ensure continuity of supply and operations.</u> This scenario would mean that of the 2Mt around 1.1Mt is anticipated to be extracted during the plan period; the remaining 0.9Mt would contribute towards the landbank at the end of the plan period.</p> <p>Additional resources could be required over the mid to late part of the plan period depending on how committed and allocated sites have performed but these locations would be identified through a review/partial review of the MWLP.</p> <p>The planning permission was granted in August 2017, the current position is that the extraction will be carried out within timescales to prevent sterilisation by the Western Rail Link. However if this was not able to be fully delivered in time the plans policies allow for other (unallocated) sites to make up the difference to come forward through the development control process. Incidentally the 2Mt is now a commitment owing to grant of planning permission and as such this amount cannot simply be discounted from the plan.</p>
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		<p>before Spring 2019 and even that amount is regarded as being unlikely due to archaeological and soil stripping requirements. The 2.0 million tonnes is unlikely to be extracted and should be removed from the sand and gravel provision. It is very doubtful that the processing plant and infrastructure for the whole site would be installed as approved for a tonnage that could be drastically reduced by the WRL development. It would appear that the majority of the sand and gravel would be sterilised as referred to in the planning application.</p> <p>If the WRL development were to be delayed and the 2.0 million tonnes of sand and gravel extracted the proposed output of 400,000 tonnes per year from 2018 would significantly increase the sand and gravel supply from the Thames and Colne Valleys area. This would increase the annual volume of material provided from the area during the early part of the Plan period and would result in an undersupply from the area during the latter part of the Plan period as resources were depleted. This would not constitute a steady and adequate supply. The planning application also suggests that sand and gravel from the site could be used in the WRL work and that spoil could be deposited in the sand and gravel void. It is unlikely that there would be a substantial demand from WRL for processed sand and gravel and the majority of concrete required would be in the form of pre-cast concrete tunnel segments which the North Park site could not supply.</p> <p>There is a very strong likelihood that the majority of the sand and gravel in the North Park site will not be worked and it should therefore be excluded from the calculation of sand and gravel provision.</p> <p>Additional resources of sand and gravel need to</p>	
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		<p>be allocated to meet the reduction due to the likelihood that the North Park reserves will be sterilised.</p> <p><i>Page 30, paragraph 4.52</i> – a new allocation at Slade Farm is included which includes two areas with a total of 2.25 million tonnes of sand and gravel. The site is subject to a planning appeal as planning permission has previously been refused and is also subject to a new planning application. There is no certainty that the site can be delivered and it should therefore be removed from the sand and gravel provision. If planning permission were to be granted it is anticipated that the Slade Farm site would provide sand and gravel beyond the end of the Plan period and these additional minerals should not be included in the Plan period landbank. Additional resources of sand and gravel need to be allocated to meet the landbank requirements for high quality materials during the Plan period. The calculated volume of sand and gravel in the site is overstated as confirmed in the document on the Buckinghamshire County Council website for planning application reference CM/59/15 provided by the Applicant and dated 5 April 2016 “Slade Farm Part 1” which states on page 12, paragraph 2.9.7 that the reserves have been overestimated. This document is provided with this submission for reference. It is not considered acceptable to include a figure of 1.25million tonnes in the Plan as that figure is acknowledged by the Applicant as being an overestimate. It is unknown if the extension area resource of 1.0 million tonnes is also overestimated. If any tonnage is to be included for the site it should be an accurate and realistic calculation.</p>	<p>Slade Farm - If a site has been subject to a planning appeal then it proves that there is landowner/industry support for the site. Furthermore there is agreement between both parties (the planning authority and the appellant) that there are no environmental/amenity issues as to why the site should be refused and therefore support in the MWLP site does make it deliverable.</p> <p>That the Slade Farm site is likely to provide mineral beyond the plan period is acknowledged in para 4.53. The provision is for sand and gravel and the provision should come from deliverable sites with industry interest. There is no reference in national guidance or in the emerging MWLP for the provision to only come from high quality materials.</p> <p>It is accepted that the figure originally supplied has been amended and this will require to be reflected in the MWLP. This will have the effect of more of Slade Farm South being able to be extracted from during the plan period.</p> <p>4.51 A further new allocation has been made at Slade Farm, Hedgerley. This comprises two elements: an allocation to the north-west of Slade Farm, adjoining and with access from Hedgerley Lane; and a potential extension to the south, taking advantage of the access and processing infrastructure once extraction has been completed from the northern site. <u>The planning application for Extraction from the northern site (1.125Mt) will should come forward in commence in the early second quarter part of the plan period. Extraction from the southern site (1Mt) is not expected to commence until the early 2030s with completion beyond the end of the plan period. On that basis it is anticipated that the northern site will</u></p>
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Page 30, paragraph 4.53 and Table 3 – paragraph 4.53 states that only 8.7 million tonnes of sand and gravel will be available from the Thames and Colne Valleys area during the Plan period. If this is the case then Table 3 should be amended as it shows 9.9 million tonnes being available from this area during the Plan period which is incorrect. The figure of 9.9 million tonnes should be replaced by 8.7 million tonnes.

The provision from the whole Plan area of 10.9 million tonnes should also be reduced by 1.2 million tonnes to 9.7 million tonnes. This would result in an under-provision of 0.8 million tonnes by the end of the Plan period. This is not sufficient to provide a steady and adequate supply throughout the Plan period.

To provide a County wide landbank of at least seven years at the end of the Plan period at least an additional 7.31 million tonnes of sand and gravel should be allocated. This would provide 6.51 million tonnes at the end of the Plan period (7 x 0.93 million tonnes) as well as meeting the Thames and Colne Valley area shortfall of 0.8 million tonnes.

In addition there is no over provision to make up any shortfall for sites that do not provide the

therefore be worked out in the last quarter of the plan period, with the south extension (1Mt) phased to come online to ensure continuity of supply and operations. This scenario would mean that of the 1Mt only around 0.3Mt is anticipated to be extracted during the plan period; the remaining 0.7Mt would contribute towards the landbank at the end of the plan period.

Ref Table 3. 9.9Mt is the total of the proposed allocations. The 8.7Mt is what is anticipated to be provided during the plan period from the Thames and Colne Valleys. Total plan provision over plan period from Thames and Colne Valleys = 17.01Mt minus permitted reserves = 7.97Mt. So the 8.7Mt that is anticipated to be provided is still technically sufficient to meet the plans needs. However the MWLP is to be amended to only specifically count those parts of allocations that are expected to have been extracted from by the end of the plan period.

Table 3: Delivery of the sand and gravel provision

	Whole Plan area	Thames and Colne Valleys (primary focus area)	Great Ouse Valley (secondary focus area)
Annual provision rate	0.93Mtpa	0.91Mtpa	0.12Mtpa
Total provision over plan period	19.53Mt	17.01Mt	2.52Mt
Permitted reserves	9.04Mt	9.04Mt	0
Remaining amount to be provided through the Plan	10.49Mt	7.97Mt	2.52Mt
Provision made by MWLP allocations (up to 2036)	40.92Mt	8.299Mt	1Mt
Balance to be found during the over the plan period	+0.44M/N/A	+04.932Mt	-1.52Mt
Surplus anticipated to be provided by allocations at the end of the plan period	N/A	1.6Mt	0

It is assumed that the reference to 1.2Mt pertains to Denham Park Farm (as stated previously in the response). As previously stated in the Councils response a variety of types and qualities of aggregates is required and so it is not considered appropriate to remove this amount as it still contributes towards the supply of aggregates.

The respondent needs to be clear about what they are arguing for- is it a clear break figure at the end of the plan period or a figure that is seven years beyond the end of the plan period.

		<p>anticipated tonnage of sand and gravel or fail to gain planning permission. A figure of 20% overprovision would be prudent. If this additional amount was not extracted during the Plan period it would contribute to the landbank at the end of the Plan period.</p>	<p>The respondent appears to be suggesting that the MWLP should be double counting, in that if sites do not come forward the provision they account for should remain and that further provision should be made for sites elsewhere. It would also be the case that such a variation from the ten year annual average provision with no specific, evidence-based reason for this variation would not be a sound approach to take. Although there do not appear to be any reasons why the allocations in the Thames and Colne Valleys will not be delivered, Policy 5 does allow for substitute sites to come forward if this is the case- although this would not change the overall provision to be made.</p>
D.K. Symes		<p>The analysis of output over the past 10 years refers to 'sales', which whilst correct, does not indicate demand, or need. Reference has been made to individual sites having planning constraints (either lorry movements, output tonnage, etc.) all of which limit availability of product to meet the need (or to provide an adequate supply). Attention is drawn to this as the 'sales' figures do not give an accurate picture of need / demand, they simply show the level of contribution to the wider supply. It is widely reported that the construction market is experiencing a strong upturn, driven by the need for increased and prolonged house building, but there are also some major infrastructure projects that will take place in and adjacent to Bucks within the Plan period (HS2, Third Runway, Heathrow rail link, etc.). The demand for aggregates will clearly remain strong for the foreseeable future.</p> <p>The use of the 10-year average is noted, but this is influenced by the 4 / 5 year period when the economy was depressed (2007 - 2011) so will naturally reflect a low average if compared over a longer period (for example a 20 year average shows 1.06 Million tonnes p.a.). Whilst it is</p>	<p>The NPPF and all other indications of demand use sales as the most identifiable measure of demand. Conditions attached to a permission limiting extraction will be factored into the seven year landbank equation.</p> <p>The purpose of a ten year provision period was to account for periods of both economic growth and economic difficulty. The MWLP uses this figure and therefore does not suggest a reduction, indeed the figure for the whole plan area is greater than a ten year provision figure because of the provision to be made</p>

		<p>accepted that the NPPF refers to the 10-year average, this must be seen as the minimum figure as there is no evidence to suggest it should be reduced, if anything it should be increased as the sub-regional pressure (especially from London) will look to those counties who have mineral resources to contribute to maintaining an adequate supply.</p> <p><i>Para. 4.32</i></p> <p>The separate identification for a supply from North Bucks is supported, especially as historically this market has relied on imports and the resources in the neighbouring authorities are becoming depleted.</p> <p><i>Para. 4.35</i></p> <p>The overall figure of 0.93 Million tonnes p.a. is supported, but again must be seen as the minimum in light of the above comments.</p> <p><i>Para. 4.37</i></p> <p>The reference to the 'recommended land bank period for sand and gravel being at least seven years' may give the impression that this level is adequate. It would be helpful to make clear that if the land bank 'falls' to seven years, then the government guidance is that there is an 'urgent' need for more permissions. In other words the seven years is an absolute 'minimum'.</p> <p><i>Para. 4.38</i></p> <p>The comment that if the land bank is over seven years it does not preclude further permissions on an allocated site is supported. However, it would be more accurate to refer to government guidance which makes it clear there is no maximum land bank and that at seven years it triggers an urgent need for further permissions, whether allocated or not.</p> <p>The 10-year provision should not be seen as fixed and will need to be reviewed through the Local Aggregates Assessments. The</p>	<p>for the Great Ouse Valley secondary area of focus.</p> <p>Noted.</p> <p>Noted.</p> <p>The MWLP does not seek to unnecessarily constrain sales but nor will it support a free for all.</p> <p>This is not disputed, although it should be noted that unlike some other parts of the country that there is a history in Buckinghamshire of meeting the seven year landbank (indeed it is currently over 11 years). It should also be noted that generally a failure to meet landbanks is due to the industry not bring forward sites to gain permission rather than the fault of the planning authority.</p>
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		<p>recognition that the output (i.e. sales) need to be flexible to maintain an adequate supply to meet the needs. Concerns have already been expressed that the provision figure is very much the minimum and the comments that the planning system should not artificially restrict output is supported, as well as recognising the need for a residual minimum of 7 years land bank at the end of the Plan period.</p> <p><i>Para. 4.42</i></p> <p>The comments in this paragraph are supported, but the correct status of the use of a seven-year land bank should be clarified.</p> <p><i>Policy 3</i></p> <p>The principle of this Policy is supported. However, the NPPF states that mineral provision should be kept under review which is the purpose of LAAs. In the event that the level of provision should warrant review, there is no flexibility to achieve this in the Policy. Prescriptive levels of output are unhelpful as they can be interpreted as limiting the ability of the industry to meet the demand (or provide an adequate supply).</p> <p>The levels of provision on which the Plan is based are clearly set out at para. 4.30 and 4.34 so do not need to be referred to in the policy. It is suggested the first paragraph is amended to say,</p> <p><i>'Provision will be made over the plan period (2016 - 2036) for the extraction of sand and gravel from the Thames & Colne Valleys (primary focus) and from the Great Ouse Valley (secondary focus) to meet the requirements of the plan.'</i></p> <p>The second paragraph suggests that a seven-year land bank 'ensures' there will be a steady and adequate supply, which is not what is said in guidance. The second paragraph could be re-</p>	<p>See comment above.</p> <p>National policy requires plans to be kept up to date this effectively means that reviews are to be undertaken at regular intervals – where the provision figure varied significantly (consistently over a period of time) from findings of the annual LAA steps would be taken to address this, such matters are likely to be picked up through the review process. This is also supported by the monitoring framework and trigger points set out in the draft plan.</p> <p>Plans that do not contain a provision policy in policy are now having to include them as otherwise they will be found unsound- for example Oxfordshire. It should be noted that flexibility is provided through Policy 5 which allows for unallocated sites to come forward where demonstrated that the development “is required to maintain a steady and adequate supply of minerals in accordance with the adopted MWLP provision rates and/or the maintenance of a landbank with reference made to the findings of the prevailing Local Aggregate Assessment”.</p>
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		<p>worded as set out below to more closely reflect guidance.</p> <p><i>'The land bank for sand and gravel will be maintained at a level that will not fall below seven years at which point it is recognised there is an urgent need for further permissions.'</i></p>	
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Do you think this amount of sand and gravel will provide adequate minerals for Buckinghamshire during this period? If not, why not?

<i>Respondent</i>	<i>Agree with provision figure</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	Yes		Noted.
Peter Brogden	Yes		Noted.
K Charman	Yes		Noted.
Zoe Davis		This is not needed, there are alternatives and ruining a village just for sand and gravel is not acceptable	Alternative aggregates (i.e. secondary and recycled) cannot be used to replace primary (land won) aggregates in all circumstance; hence the extraction of primary aggregates is required to support growth. National policy states that minerals are essential to support sustainable economic growth and our quality of life, and that mineral planning authorities should identify and include policies for extraction of mineral resource of local and national importance in their area (refer NPPF para 142-3).
D Harvey	Yes	I think it is too much, i.e much more than adequate.	The provision rate for the MWLP has been determined through consideration of local circumstances and sales data (in line with national policy and guidance).
Mr and Mrs Lawani	No	Please refer to the email from Hedgerley Parish Council to Mr A Sierakowski dated 10 th August 2017 – Copy of email included in comments under first question in relation to minerals provision.	See comments under first question in relation to minerals provision.
M Newey	Yes		Noted.
M & K Orchard	Yes		Noted
Mr D Ward	Yes		Noted
Mrs S Ward	Yes		Noted
Buckingham Canal Society	Yes		Noted.
Aston Clinton Parish Council	Yes		Noted
Buckingham Town Council	Yes		Noted.
Gawcott with Lenborough	Yes		Noted

Parish Council			
Gerrards Cross Town Council	No	Adequate means sufficient, the amount proposed is excessive.	The provision rate for the MWLP has been determined through consideration of local circumstances and sales data (in line with national policy and guidance).
Hedgerley Parish Council	Yes		Noted
Iver Parish Council		Given the lack of clarity on housing and other infrastructure programmes for the next 20 years, it is impossible to tell.	The role of the MWLP is to facilitate sustainable growth and provide guidance for development within the county over the plan period and avoid and/or minimise potentially adverse impacts to acceptable levels. The impact of not having a plan (based on the notion that it is impossible to tell what is needed) to guide development and identify provision rates is highly likely to be far less acceptable than the proposals put forward through the Draft Plan. National policy requires a provision rate to be determined and identified in the MWLP. This has been done in line with national policy and guidance.
Radclive cum Chackmore Parish Council	Yes		Noted.
Central and Eastern Berkshire Authorities		It is noted that the permitted minerals sites of Harleyford Marina, Marlow and Berry Hill Farm, Taplow will continue to supply minerals to meet local demand. Due to the proximity of these sites to Central & Eastern Berkshire, it is likely that these areas will form part of the local market. It is also noted that Springfield Farm, Beaconsfield (South Extension) is allocated and is likely to serve the local mineral market which will include Central & Eastern Berkshire. There are currently no active soft sand sites in Central & Eastern Berkshire and the soft sand resources are not currently of economic interest. Therefore, it is assumed that the need for soft sand in Central & Eastern Berkshire is currently being met by neighbouring authorities. As Springfield Farm and the proposed extension contain soft sand reserves, it is possible that the	Noted. Market demand, and imports/exports, is subject to commercial dealings and so this may be possible however cannot be guaranteed.

		<p>site may be currently or in the future supply soft sand to Central & Eastern Berkshire.</p> <p>The Aggregate Monitoring (2014) Survey by the British Geological Survey (BGS) noted that between 6,010 and 60,100 tonnes of sand and gravel were exported to Berkshire from Buckinghamshire but that between 78,900 and 157,800 tonnes of gravel were imported from Berkshire to Buckinghamshire. Mineral movements are not always reported at a Unitary level. However, in this case, the sand and gravel was exported from the Royal Borough of Windsor & Maidenhead.</p>	Noted.
Brett Aggregates Ltd	No	As stated in Question 2, there should be an allowance made for a landbank to meet the demand for the Plan Period, plus 7 years in order to meet NPPF policy.	It is considered there is no need to provide for allocations for a seven year landbank period beyond the end date of the MWLP. There is strong government support to regularly review plans and as part of this it is very likely that key elements such as provision rate and allocations would be reviewed as appropriate.
Quattro	No		As no detail regarding why the identified mineral requirements are not considered appropriate has been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identified provision rates and areas of focus.
Summerleaze		<p><i>Page 1, paragraph 1.3</i> – it is stated that the Plan period extends from 1 January 2016 to 31 December 2036, a period of 21 years. This is a longer period than many other Mineral and Waste Plans and the Plan should be sufficiently flexible and robust to provide for an adequate supply of minerals throughout the Plan period. The Plan should therefore make an over-provision of aggregate minerals to accommodate any unpredicted increases in demand during the 21 year period within the County and in adjacent development areas particularly in the Thames Valley. The Plan should also over-provide in order</p>	<p>The plan period is up to 2036, a period of 21 years. It is reasonable to assume that, in line with the requirement to maintain an up-to-date plan, the plan will be reviewed before this end date. Accordingly the end date of the plan may be extended and/or allocations reviewed (with new allocations made where appropriate) in line with any revisions to the provision rate and landbank levels.</p> <p>There is no requirement to include surplus/reserve sites to provide an overprovision. The MWLP balances out the allocations with policy to allow for unallocated sites to come forward, thereby providing for flexibility and allowing the market to respond to increases in demand.</p>

		<p>to address any reduction in recoverable mineral tonnages within the individual allocated sites due to currently unforeseen constraints that may arise during the planning application process. It is recommended that an additional 20% sand and gravel provision should be provided to meet any increase in demand or reduction in site tonnage.</p> <p>Finally there should be adequate resources identified to ensure the continuation of at least a seven year landbank at the end of the Plan period, an additional 6.51 million tonnes, equivalent to 7 years at 0.93 million tonnes per year.</p>	<p>There is no robust evidence to support an increase (or decrease) from the ten years average sales figure of 0.81Mtpa for the Thames and Colne Valleys. Neither the NPPF nor NPPG stipulate that the plan must identify a specific provision or surplus/reserve sites in order to ensure landbanks at the end of the plan period.</p>
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Mineral Allocations

The plan identifies a primary focus on sites within the Thames and Colne Valleys and a secondary focus on sites within the Ouse Valley. Do you agree with a primary focus for mineral extraction on the Thames and Colne Valleys with a secondary focus on the Great Ouse Valley?

<i>Respondent</i>	<i>Agree with the areas of focus</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	No		As no detail regarding why the identified primary and secondary areas are not considered appropriate has been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the areas of focus.
Peter Brogden	No		As above.
K Charman	No		As above.
Zoe Davis	No		As above.
D Harvey	No		As above.
Mr and Mrs Lawani	No		As above.
M & K Orchard	No		As above.
Mr D Ward	Yes		Noted
Mrs S Ward	Yes		Noted
Tom Webb	Yes		Noted.
Buckingham Canal Society	Yes		Noted.
Chiltern Society	Yes		Noted
Aston Clinton Parish Council	Yes		Noted
Buckingham Town Council	Yes		Noted.
Gawcott with Lenborough Parish Council	Yes		Noted
Gerrards Cross Town Council	No	There is too much emphasis on the Thames and Colne Valleys, resulting in the desecration of the countryside and Green Belt, which residents in	Minerals can only be provided from areas where they are present and there are sand and gravel resources in the Thames/Colne valleys. The MWLP is not proposing

		South Buckinghamshire value more highly than supplying sand and gravel for building outside of South Buckinghamshire. The countryside is the reason we pay a high premium to live here and this is being betrayed by BCC with this plan. The temporary extraction site at Wapseys Wood remains an inaccessible stinking eyesore after 50 years, occupied by travellers, with no prospect of access to the Green Belt amenity that has been permanently destroyed. The site owners still have an outstanding planning application for further waste processing that is being considered by BCC. BCC cannot be trusted to allow gravel extraction at Slade Farm in the same way.	continuation of waste development at Wapseys Wood and this area will need to be restored as per its planning permission.
Iver Parish Council	Yes		Noted.
Radclive cum Chackmore Parish Council	Yes		Noted.
West Berkshire Council		Policy 2 sets out the spatial strategy for the area over the plan period. This is considered to be sound. In particular the encouragement of recycling is supported.	Noted.
Brett Aggregates Ltd	Yes		Noted.
CEMEX		CEMEX support this spatial strategy. It notes that the Great Ouse Valley east of Buckingham is promoted a secondary focus for aggregate extraction. CEMEX would expect that if sites do not come forward from industry in this area – that any shortfalls in expected provision are then made from the Thames and Colne Valleys if suitable located resources are available.	Noted. The MWLP has specifically identified separate provision figures for the Thames/Colne Valleys and the Great Ouse Valley to prevent provision being re-apportioned between these areas.
Quattro	Yes		Noted.
D.K.Symes		<i>Para. 4.51</i> The allocation of the further 1.0 million tonne site adjacent to the North Park site is supported. However, due to the time constraints on the	It is uncertain how identifying the south west part of the allocation as an extension of the area permitted constrains the WRL works. The extension area is in

		<p>WRL it should not be specifically identified as an extension as this could constrain the WRL works. Whilst cumulative impacts need to be addressed should mineral extraction be proposed to take place concurrently, greater flexibility is needed. This is supported by indications of pressure for new housing in this locality where it may be necessary to consider prior-extraction should the site or adjacent land be identified.</p> <p><i>Para. 4.52</i> The identification of Slade Farm is supported. The site is well located to meet the demand from the High Wycombe area by 'replacing' the output from the now closed Marlow Quarry. It is also noted that the Harleyford Marina mineral site is completed and that the Springfield Farm Quarry has planning limitations on output.</p> <p><i>Para. 4.54</i> The identification of Hydellane Farm is supported. This site will provide a long needed local supply to the Aylesbury / Buckingham area.</p> <p><i>Policy 4</i> The sites identified in the policy are supported.</p>	<p>South Bucks district and there are no indications in the emerging Chiltern and South Bucks Local Plan that they have any intention of releasing this area from the Green Belt for non-mineral development. If this was to be proposed then prior-extraction would be required.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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Do you agree with the proposed mineral sites identified in the plan? If no, why not?

<i>Respondent</i>	<i>Agree with allocations</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	No	Far too much emphasis on South Bucks in an already busy area of the green belt. Slade Farm is in a conservation area and such large destruction will have a devastating impact on the area for humans and wildlife.	Sand and gravel can only be extracted from areas where the mineral resources are present; the South Bucks area is where most of the Buckinghamshire sand and gravel resources lie.
Peter Brogden	No	It would appear that provision from the Ouse Valley is pitched low simply due to lack of historical extraction data rather than future potential The methodology for bringing sites into the landbank is flawed and results in overriding the objections of local residents and other site specific interested parties. In particular Slade Farm has been repeatedly put forward by its (non-resident) landowner against strong local objection, most recently in applications CM/59/15 (in appeal) and CM/57/17. Once accepted into the MWLP planning consent is automatic and local considerations are swept aside. The MWLP methodology does not balance least cost minerals against value of local amenity. It is almost certain that there are other suitable locations for minerals extraction.	If you look at the respective geographical areas, the Ouse Valley has not been “pitched low” (also if it was then there is far more capacity in the primary area as well). The methodology for site assessment is standard and has been proved to be sound in other plans that have been examined by an independent planning inspector. Amenity is one of the many criterion included in the assessment methodology. It should be noted that planning consent is not automatic, with all sites (allocated and unallocated) required to submit a planning application and be subject to assessment.
K Charman	No	My comments concern purely Slade Farm since I have no knowledge of the other sites. I would like to object to the proposed inclusion of Slade Farm for mineral extraction in the local plan. In addition to the detrimental effect to wildlife in the neighbouring woodland, including the birds in RSPB’s Church Wood, just across the road, the detrimental effect to air quality for Hedgerley and Hedgerley Green residents, and subsequent	Such matters are addressed through the site assessment. It should be noted that Slade Farm South is over 300m west of the RSPB site (not designated) - separated by Suttons Wood LWS and a field. A note in the site assessment will be made of the location of the RSPB site.

		adverse health effects, the access to Hedgerley Lane via Beaconsfield Services roundabout is already congested for several hours a day and the additional traffic would cause extra congestion on the M40 and A355 and surrounding roads, would cause gridlock.	
Zoe Davis		Hedgerley Village is an area of beauty. We have wildlife; we have a beautiful idyllic village. Should this mineral plant come to fruition, it will not only ruin the green land, but the air and noise quality. Houses are already not selling or dropping in price because of this proposal. Our CHILDREN live here! They can roam freely, they are safe. This plan will ruin all of that and I am very certain there are other areas this could happen in rather than ruin greenbelt.	National policy recognises that minerals can only be worked where they are found and does not prohibit extraction from within Green Belt land (refer NPPF para 90 and 142). All of the sites allocated in the primary area in the Draft Plan are in the Green Belt. There will be no extraction traffic permitted in the vicinity of settlements – it would be routed towards the M40 east on Hedgerley Lane.
S & L Donnithorne		<p>We wish to object to the above plan for the following reasons:</p> <p>Slade Farm is within green belt; Concrete Batching, Processing and Workshops must be discouraged unless there are exceptional circumstances.</p> <p>The scale of development is too large and does not ensure Green belt and nearby cultural heritage sites protection.</p> <p>Hedgerley village and Hedgerley Green both include a number of listed buildings which must be conserved with no adverse impact to their settings.</p> <p>The draft MWLP does not provide evidence that the mineral extraction would not cause adverse impact on these cultural sites.</p> <p>It is contrary to national planning policy (NPPF par 134).</p> <p>The attractive rural setting would be unduly affected by this large scale MWLP; both by visual intrusion and much extra heavy traffic.</p> <p>Existing traffic is already a problem by Beaconsfield Services roundabout.</p>	<p>Mineral extraction is not inappropriate in the Green Belt (NPPF para 90). Other forms of development would be assessed against the plans policies and the NPPF – in particular para 87-90.</p> <p>The site assessment criteria addresses matters raised regarding designations and potential adverse impacts. Such matters would also be dealt with in detail through the planning application process.</p> <p>NPPF para 134 states: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. It is not clear how reference to this para relates to the response or MWLP. The MWLP contains policies</p>

		<p>Any proposal should seriously consider the current problem before permitting this large MWLP development.</p> <p>We are sure there are other existing sites which could be enlarged or where such devastation to a place of natural beauty could be avoided.</p>	<p>addressing potential adverse impacts on features and designations (Section 7). In relation to the historic environment Policy 20 requires development proposals to conserve heritage assets in a manner appropriate to their significant and seeks enhancement of the historic environment where possible – as per national policy. A large proportion of the allocations in South Bucks are extensions to existing sites.</p>
Mr D Fettes		<p>As a Hedgerley resident I would like to voice my strong objection to the 2017 proposed Minerals and Waste Local Plan.</p> <p>At the moment the minerals plan in force is the 2012 version.</p> <p>In this (2012 in-force version) Slade farm is NOT a preferred option.</p> <p>BCC's rejected planning application CM/59/15 for extracting minerals at Slade Farm (August 2016) as they found then;</p> <p>That there was no need for this amount of gravel.</p> <p>There was no need for the use of a green field site.</p> <p>That it was not justified in this case to use Green Belt land for quarrying.</p> <p>These objections all still apply</p> <p>Hence it is entirely unacceptable that the BCC proposed Mineral plan (2017) says the Slade farm north site IS NOW a preferred site, and furthermore adds yet another site -Slade farm south as another preferred site!</p> <p>The sand and gravel landbank in Bucks as reported by the LAA is still sufficient hence there is no need to quarry at Slade Farm other than for the financial benefit of the applicant.</p> <p>BCC note "phasing of permissions/operations will be necessary to avoid cumulative impacts" (of these TWO sites). "The timeframe for working the site is likely to be in the long term</p>	<p>The adopted plan is currently under review in line with the national policy direction to maintain an up to date plan. This also reflects the position in the 2012 Core Strategy which states that "preferred areas for sand and gravel extraction will be identified in the Minerals Local Plan". Mineral extraction is not inappropriate within Green Belt land as per the NPPF para 90.</p> <p>The landbank may still be sufficient but it needs to remain so over the plan period, hence new sites must be identified through the plan in order to maintain landbanks and a supply of aggregates. Where two sites are identified (one being an extension) phasing of works is preferable.</p> <p>The timeframe for working the north site is in the short term and for the south site is the long term of the plan</p>

		<p>following proposed extraction at the adjacent site (Slade Farm north)". (BCC Technical Report). So now BCC are proposing much longer than the original 12 years of unacceptable disruption! BCC explain this by stating that "The site has been brought forward by the operator" and "meets their vision".</p> <p>Despite BCC noting that in our locality currently "a tranquil and calm landscape exists" They state that the proposed quarrying will produce; "Potential for cumulative impacts resulting from interaction of the M40, quarry and traffic movement", "potential for impacts related to increased traffic movements" "Emissions from the proposed sand and gravel operation are primarily expected to be dust (particulate matter) including quantities of PM10, "</p> <p>BUT They then assess any impacts on Hedgerley and the surrounding area as "low adverse" (ie not even "moderately adverse") which is simply a misuse of a subjective judgement scale, and they consider ""Subject to access onto Hedgerley Road it is unlikely that there would be any impact upon highway infrastructure".</p> <p>Both Hedgerley and Hedgerley Green are designated conservation areas. Hedgerley Green and Hedgerley Village Conservation Areas are 420m and 640m from the Slade Farm North site respectively (and Hedgerley Village Conservation Area will be even less- 334m when the South Slade site comes onstream)</p> <p>This land should not be used for industrial purposes. I am concerned about the effect on pollution and noise pollution (despite the</p>	<p>period. The operational life of the north site is around 12 years and the south site is 6-7 years. Operator backing of the site supports deliverability. The plans purpose is to facilitate delivery of an adequate supply of aggregates to support sustainable growth in a manner that is environmentally acceptable. The site assessments address potentially adverse impacts. HGV access would be controlled through a routing agreement- vehicles would have to move from the site westwards along Hedgerley Lane to the M40 junction.</p> <p>It should be noted that mineral extraction is a primary industry, which would normally occur in rural areas.</p>
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		<p>reassurance that “5m bunds rather than the standard 3m bunds will be used “to help reduce noise levels”).</p> <p>Hedgerley is a quiet and rural location which would be hugely disrupted by any increase in lorry traffic along our local roads.</p> <p>The roundabout outside the motorway service area is already congested at many times, and not just the rush hour, with vehicles coming on from the M40 and A355, and vehicles queuing to get onto the roundabout from Hedgerley Lane, and the “average” of 122 lorry movements per day using Hedgerley Lane to and from the A355 and M40 will cause huge traffic problems to local residents and service area users alike. The lorry movements will be likely to have an inconsistent flow rate giving an overall “average” but causing bottlenecks not allowed for in “average” calculations. Hedgerley Lane itself and the surrounds would be reduced to a muddy, dust-filled eyesore by the proposed lorries, while we queue behind the necessary road sweeping vehicle. Traffic problems on the tiny narrow roads through Hedgerley village would be likely to increase.</p> <p>Hedgerley Lane will become repeatedly damaged and more dangerous to navigate. Hedgerley should not be opened up to a constant flow of HGV's damaging the roads and polluting with diesel fumes.</p> <p>Hedgerley lane is often used by local families and children to walk or cycle to Beaconsfield as well by joggers and cyclists. The only other route available is the A355, which does not have a footpath and is neither suitable for pedestrians or cyclists. The only relatively safe way of getting to Beaconsfield by foot or cycle is Hedgerley Lane.</p> <p>All the roads around Hedgerley are minor roads</p>	
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		<p>and none appear suited to a high level of HGV traffic. The effect of diesel particulates and dust particulates is well known on human health. For the residents of Hedgerley and Hedgerley Green (designated conservation areas) this application would cause an unacceptable deterioration of quality of life. To call extraction of 1.2 million tonnes of sand and gravel over 12 years “temporary” to try and get around the protection against development in the Green Belt is disingenuous in the extreme. The fact that BCC are proposing that this 12 years would be followed up by another long period of quarrying from the Slade Farm south site shows the lack of regard for the residents of Hedgerley and Hedgerley Green. It would also affect the many walkers who use the footpaths and lanes in this “Area of Attractive Landscape” within the Green Belt of South Bucks as a wonderful amenity</p> <p>There are walks all around Slade Farm which is the site of this planned gravel extraction development. The land forms part of a network of paths linking it to Burnham Beeches and as such is an area visited and enjoyed by many for walking and cycling.</p> <p>This proposal could adversely impact the value of Hedgerley homes.</p> <p>How will Bucks County Council compensate homeowners in Hedgerley for depressed property values?</p>	
Rt Hon Dominic Grieve QC MP		<p>Slade Farm, Hedgerley - I am particularly concerned about this application. As you will be aware, both Slade Farm allocations lie within the green belt. The nature of any development at Slade Farm, should therefore respect this and focus solely on mineral extraction with a proper plan for reinstatement after.</p>	<p>Although the NPPF makes it clear that mineral extraction is not inappropriate, in some cases (appeal decision for sand and gravel extraction including processing at land at Pynesfield (APP/M1900/A/14/2218970)), on-site processing within the Green Belt may be inappropriate, this would need to be assessed on a site-by-site basis. Access and restoration would be classed as not inappropriate as</p>

		<p>I am therefore particularly concerned to note that developments ancillary to mineral extraction might be envisaged. These in my view should be discouraged because of the very special circumstances in respect of the site.</p> <p>I am also particularly concerned, as the site is located in an attractive rural area and development, should respect this in so far as is possible. This requires a proper after-care plan and needs to achieve the confidence the local community, if it is to be accepted.</p>	<p>these elements are an integral part of operations. This will be clarified through amendment of the policy and para 7.49 (now para 7.51). Restoration is addressed in Policy 26, a restoration scheme must be agreed prior to planning permission being granted, details of which are considered on a site-by-site basis in line with adopted policy.</p> <p><u>7.51 Elements of development considered integral to extractive operations (other than those necessary for the winning of mineral) include those associated with access and restoration. The deposit of inert waste to land to facilitate restoration of mineral extraction sites may be required to preserve the openness of the Green Belt, and so need not conflict with the purposes of including land in the Green Belt. Other forms of development, including on-site processing, would need be assessed on a site-by-site basis against relevant MWLP policies and national policy.</u></p> <p><u>Policy 22: Green Belt</u></p> <p>Mineral extraction within the Green Belt will be supported <u>provided that it preserves the openness of, and does not conflict with the purposes of including land in, the Green Belt and where compliant with relevant MWLP policies. Other than those required for the winning of mineral, elements of development considered integral to extractive operations include those associated with access and restoration. Other forms of development, including on-site processing, will be supported where compliant with relevant MWLP policies and national policy.</u></p>
Mr and Mrs Lawani	No	Please refer to the email from Hedgerley Parish Council to Mr A Sierakowski dated 10 th August 2017 - Copy of email included in comments under first question in relation to minerals provision.	See comments under first question in relation to minerals provision.
B & C Livingston		Because the allocations are in the green belt, development ancillary to mineral extraction (e.g. concrete batching, processing, workshops etc.) should be discouraged unless “very special	The allocations are for mineral extraction, as per the NPPF this form of development is not inappropriate, provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land

		circumstances” can be demonstrated; The restoration of Slade Farm should be achieved without landfill or recycling as national planning policy suggests in the green belt;	in Green Belt (NPPF para 90). Other forms of development would be assessed against the plans policies and the NPPF – in particular para 87-90. Restoration would need to preserve the openness of the Green Belt - disposal of inert waste should therefore be acceptable.
D Harvey	No	I do not think Slade Farm should be developed. It is in a Green Belt area and for this reason and others- such as poor site access and biodiversity – it should not be developed.	Government policy allows mineral extraction in the Green Belt (NPPF para 90).
M & K Orchard		It would appear that provision from the Ouse Valley is pitched low simply due to lack of historical extraction data rather than future potential. The methodology for bringing sites into the landbank is flawed and results in overriding the objections of local residents and other site specific interested parties. In particular Slade Farm has been repeatedly put forward by its non resident landowner against strong local objection, most recently in applications CM/59/15 (in appeal) and CM/57/17. Once accepted into the MWLP planning consent is automatic and local considerations are swept aside. The MWLP methodology does not balance least cost minerals against value of local amenity.	The Briefing Note on Minerals Provision (which accompanied the Preferred Options MWLP) sets out how the provision figure for the Great Ouse Valley was arrived at. The methodology for site assessment is standard and has been proved to be sound in other plans that have been examined by an independent planning inspector. Amenity is one of the many criterion included in the assessment methodology. It should be noted that planning consent is not automatic, with all sites (allocated and unallocated) required to submit a planning application and be subject to assessment.
Lady Scott		I strongly disagree with the proposed Minerals Site at Hyde Lane Farm for the following reasons: 1. The Leckhampstead Wharf road (described as an ‘unnamed road’) is subject to frequent flooding every winter and has been closed to road traffic due to flooding on numerous occasions. We suggest that it presents a ‘High Impact Risk’ not ‘Moderate Adverse Risk’ as stated in the appraisal. 2. The site is within the Lower Great Ouse Valley LCA. There are 3 BNSs adjacent and in	Sand and gravel working is considered water-compatible development under national policy and guidance. The site assessment criteria addresses matters raised regarding designations and potential adverse impacts. Minerals extraction is a temporary form of development, albeit some sites may have a longer life than others. Minerals can only be worked where they occur and their extraction is necessary to support sustainable economic growth and our quality of life. In relation to the restoration of the Buckingham Arm, Policy 26 will be amended to include reference to this.

		<p>close proximity to the proposed site. The assessment states that restoration would mitigate this problem. What the assessment fails to take into account is that minerals extraction sites have a life of many years, sometimes decades. This is underlined by the minerals extraction site further along the A422 near Deanshanger, Northamptonshire, which has been in operation for over 10 years. “Restoration’ would be in the fairly long term and in the intervening years, these sites would be lost. The assessment does not seem to be aware of the Deanshanger site as it is stated that there are no other extractions operations within the local area.</p> <p>3. The site has many historic environment and heritage assets which would be detrimentally impacted as the proposed site covers a large area. Leckhampstead Wharf Farm would be sandwiched in the middle of the site.</p> <p>4. The landscape character would be significantly changed with adverse visual impacts. The suggestion that these impacts would be ‘temporary’ again does not take into account the timescale of the mineral extraction.</p> <p>5. It seems extraordinary that the assessment considers the opportunities for beneficial restoration after use to a ‘low beneficial’ risk considering the time scale of operations as mentioned above.</p> <p>6. The Buckingham Canal Society is restoring the Buckingham Arm of the Grand Union Canal. The proposed site would adversely affect their well developed plans which have the backing of the National Waterways Authority.</p> <p>7. The Buckingham Canal Nature Reserve, to the east and south of the proposed site, would be adversely affected. This Reserve is a joint partnership with Milton Keynes Council whose</p>	<p>Add bullet to the third para - <u>Sites located within the Great Ouse Valley should support the Buckingham Canal restoration.</u></p>
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		<p>views have not be sought to our knowledge.</p> <p>8. It is proposed that 2 footpaths (RoW LEC/25/1 an RoW THB/11/1) might be 'temporarily' removed. These removals could last many years. In addition RoW FOS/7 would abruptly end where it meets RoW LEC/25 on the Parish boundary.</p> <p>9. It is proposed that the site access, with the many movements of works vehicles should be on to the A422 with the construction of a new junction. The A422 is extremely busy and key times of the day with commuter and school traffic. The dangerous Cattleford Bridge 'S' bends, where several fatal accidents have occurred in the past few years, are some hundred yards from the site on the A422.</p>	
Mr D Ward	No	<p>The roads within the vicinity of Slade Farm (M40 and A355) are already congested as the Motorway Services are very popular with HGV's and cars. The safe transportation of extraction material would be compromised.</p> <p>Slade Farm is located in an attractive rural area (Conservation area- Hedgerley Village and Listed Buildings – Slade Farm house) and any development at these sites should conserve and enhance the existing landscape character. They should be on a small scale only focussing on mineral extraction with no ancillary processes such as concrete batching. Any proposed development should take into account a comprehensive restoration and aftercare scheme which does not include landfill or recycling.</p> <p>In addition any development at Slade Farm should also consider carefully the impact of flooding on the local area.</p>	<p>The site assessments address potentially adverse impacts.</p> <p>HGV access would be controlled through a routing agreement.</p> <p>Any application would be required to be accompanied by a restoration and aftercare scheme. Inert fill is often required to complete restoration works (not "black bag" waste).</p>
Mrs S Ward	No	<p>The draft MWLP fails to provide evidence that mineral extraction at Slade Farm would not result in an adverse impact on the setting of</p>	<p>The site assessments address potentially adverse impacts.</p> <p>Development would need to be in accordance with the</p>

		<p>cultural heritage assets and is therefore contrary to national planning policy (NPPF paragraph 134). Within the vicinity of Slade Farm there are a number of listed buildings eg Slade Farm house- Grade II listed building and Hedgerley Village which is a conservation area.</p> <p>Any potential development at Slade Farm should be on a small scale focusing only on mineral extraction.</p> <p>Any development should not detract from the openness or character of the green belt.</p> <p>Restoration of Slade Farm should be achieved without landfill or recycling as national policy suggests in the green belt.</p>	MWLP and national policy regarding Green Belt.
Tom Webb	No	<p>Slade Farm is unsuitable and is not needed as explained in the many objection letters and the BCC rejection of the application.</p> <p>The gravel would not be needed until the later years of the plan and the sites below could provide that capacity- <i>Denham Extensions and Springfield Farm Extension</i>.</p>	As set out in both the Draft Plan and the background documentation new sites will be needed over the plan period and the Slade Farm site is suitable to be one of those contributing to that provision. The issue is when during that plan period the site should start to be implemented.
Buckingham Canal Society	Yes		Noted.
Chiltern Society	Yes		Noted.
Aston Clinton Parish Council	Yes		Noted
Buckingham Town Council	No	<p>Ouse Valley Site</p> <p>Noise and other pollution. Increased traffic movements particularly if linked to HS2 construction via inadequate roads. Possibly also E-W Expressway depending on route selected.</p> <p>Sufficient clawback to cover maintenance and upgrade of local roads.</p> <p>Possible effect on the river – flooding and pollution.</p> <p>Effects on settled nature area and its ecology.</p>	As set out in both the Draft Plan and the background documentation new sites will be needed over the plan period and this site is suitable to be one of those contributing to that provision. Consideration of potential adverse impacts is addressed through the site assessment criteria, however the detailed matters specifically raised will require to be addressed at planning application stage if this location is to be given permission for extraction.
Foscote Parish Meeting		I strongly disagree with the proposed Minerals Site at Hyde Lane Farm for the following reasons:	Sand and gravel working is considered water-compatible development under national policy and guidance. The site assessment criteria addresses

		<p>1. The Leckhampstead Wharf road (described as an 'unnamed road') is subject to frequent flooding every winter and has been closed to road traffic due to flooding on numerous occasions. We suggest that it presents a 'High Impact Risk' not 'Moderate Adverse Risk' as stated in the appraisal.</p> <p>2. The site is within the Lower Great Ouse Valley LCA. There are 3 BNSs adjacent and in close proximity to the proposed site. The assessment states that restoration would mitigate this problem. What the assessment fails to take into account is that minerals extraction sites have a life of many years, sometimes decades. This is underlined by the minerals extraction site further along the A422 near Deanshanger, Northamptonshire, which has been in operation for over 10 years. "Restoration" would be in the fairly long term and in the intervening years, these sites would be lost. The assessment does not seem to be aware of the Deanshanger site as it is stated that there are no other extractions operations within the local area.</p> <p>3. The site has many historic environment and heritage assets which would be detrimentally impacted as the proposed site covers a large area. Leckhampstead Wharf Farm would be sandwiched in the middle of the site.</p> <p>4. The landscape character would be significantly changed with adverse visual impacts. The suggestion that these impacts would be 'temporary' again does not take into account the timescale of the mineral extraction.</p> <p>5. It seems extraordinary that the assessment considers the opportunities for beneficial restoration after use to a 'low beneficial' risk considering the time scale of operations as mentioned above.</p>	<p>matters raised regarding designations and potential adverse impacts.</p> <p>Minerals extraction is a temporary form of development, albeit some sites may have a longer life than others. Minerals can only be worked where they occur and their extraction is necessary to support sustainable economic growth and our quality of life.</p>
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		<p>6. The Buckingham Canal Society is restoring the Buckingham Arm of the Grand Union Canal. The proposed site would adversely affect their well developed plans which have the backing of the National Waterways Authority.</p> <p>7. The Buckingham Canal Nature Reserve, to the east and south of the proposed site, would be adversely affected. This Reserve is a joint partnership with Milton Keynes Council whose views have not be sought to our knowledge.</p> <p>8. It is proposed that 2 footpaths (RoW LEC/25/1 an RoW THB/11/1) might be 'temporarily' removed. These removals could last many years. In addition RoW FOS/7 would abruptly end where it meets RoW LEC/25 on the Parish boundary.</p> <p>9. It is proposed that the site access, with the many movements of works vehicles should be on to the A422 with the construction of a new junction. The A422 is extremely busy and key times of the day with commuter and school traffic. The dangerous Cattleford Bridge 'S' bends, where several fatal accidents have occurred in the past few years, are some hundred yards from the site on the A422.</p>	
Gawcott with Lenborough Parish Council	No	<p>Ouse valley site – Attention must be paid to noise, pollution and traffic generation in the immediate area of extraction and re traffic in the wider areas where the present roads infrastructure is already overstretched. If the means of access is not available the sites should be rejected until the appropriate improvements are carried out. HGVs must be routed away from residential areas with close monitoring of routes used by carriers. Also consider effects on river flooding and pollution resulting from extraction works.</p>	<p>The site assessments address potentially adverse impacts. Detailed mitigation of potentially adverse impacts would be addressed at the planning application stage. HGV access would be controlled through a routing agreement.</p>
Gerrards Cross Town	No	<p>We disagree with Slade Farm as a proposed mineral site as it means the destruction of Green</p>	<p>Government policy allows mineral extraction in the</p>

Council		Belt, which is against BCC and Government policy. The residents of Buckinghamshire pay a high price to live in this beautiful county and it is unacceptable that this should be sacrificed for industrial development. As an absolute minimum, Slade Farm should not be allowed to go ahead until Wapsey Wood is completely restored to original Green Belt as promised; restoration of all footpaths, removal of all industrial developments and travellers and return to farmland and woodland.	Green Belt (NPPF para 90).
Hedgerley Parish Council	No	<p>Policy 4: Allocated Sites for Sand and Gravel Provision states that “sand and gravel provision to meet the requirement to 2036 will come from sites with planning permission as of 1 January 2016 and the following allocated sites</p> <p>M6: Slade Farm North (Hedgerley) (1.25Mt) and M7: Slade Farm South (Hedgerley) (1Mt)”</p> <p>The preceding section 4.43 states that “in making the allocations for sand and gravel, as identified in Policy 4: Allocated Sites for Sand and Gravel Provision, a range of environmental, social, spatial and operational considerations were taken into account as detailed in the Site Assessment Methodology (May 2017) and the Technical Annex – Site Assessments (June 2017).</p> <p>Representations</p> <p>The way the Site Assessment Methodology (May 2017) and the Technical Annex – Site Assessments (June 2017) have been applied in the case of the proposed Slade Farm allocations (M6 and M7) is fundamentally flawed. If the methodologies had been correctly applied it would be apparent that mineral extraction cannot take place at either site in a manner which would be compliant with the aims of proposed policies 20: Historic Environment and 22: Green Belt.</p>	

		<p>Listed Buildings</p> <p>The Stage 1 site assessments carried out for M6: Slade Farm North (Hedgerley) and M7: Slade Farm South (Hedgerley) test the sites in terms of the question “does the site include, or is the site located within or directly adjacent to, a designation for national or international interests / features” and notes the proximity of the Listed Buildings at Slade Farm (as 69 metres south of site M6 and 74 metre north of site M7).</p> <p>It appears to be the case that these Listed Buildings were not judged to be “adjacent” both sites and were therefore awarded yellow flags (i.e. generally in compliance) in relation to that consideration.</p> <p>This approach is flawed – since if the purposes of the test is to establish compliance with the aims of Policy 20: Historic Environment (which include the avoidance of adverse effects on the setting of Listed Buildings) it is quite clearly perverse to assess the potential allocation of land within just c.70 metres of a group of Listed Buildings as being “generally in compliance.”</p> <p>The Stage 2 site assessment is equally flawed in this respect in that it makes no reference to the likely effects on the setting of the Listed Buildings. The cross reference included in the Stage 2 site assessment to the County Council’s decision on application number CM/59/15 does not help since:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the applicant’s own ‘Historic Building Impact Assessment’ (HBIA) stated that the aesthetic value, derived from both the functional changes over time, the approach to the farm, and how the farm interacted with its environment is still readable and that the setting is integral to this aesthetic appreciation of the farm complex and that the immediate setting of the farm is significant in that the entire mid-19th 	<p>The methodology states “within or directly adjacent” the listed buildings are not directly adjacent hence the yellow flag (and not red).</p> <p>The purpose is not to test compliance with the emerging plans policies (as these had not been drafted when the assessment was carried out) but to identify “show stoppers” that would render the site unacceptable.</p> <p>The overall assessment of the planning application as stated was “less than substantial harm” –this does not automatically mean that the site is not acceptable as such impacts are able to be minimised to acceptable levels.</p>
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		<p>century complex appears to survive. The applicant further acknowledged that the surrounding landscape forms one aspect of the setting of the heritage asset and so, also has a bearing on significance. The appellant was therefore clear that the setting and therefore the application site (here proposed allocation site M6: Slade Farm North (Hedgerley) contributes to the significance of the Listed Buildings at Slade Farm;</p> <ul style="list-style-type: none"> □ in summary, the applicant's own assessment was that the site contributes to the setting and significance of the Slade Farm and that the application would result in "less than substantial harm" to the designated heritage assets of Slade Farm; and □ the County Council failed to perform its statutory duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (P(LBC)A) when it determined the application number CM/59/15 – since it gave no consideration to the likely effects on the setting of the Listed Buildings at Slade Farm. Since proposed site allocations M6: Slade Farm North (Hedgerley) and M7: Slade Farm South (Hedgerley) are only c. 70m from the Listed Buildings at Slade Farm and all the evidence is that mineral extraction at either location will have an adverse effect on the setting of those Listed Buildings, the P(LBC)A places a statutory duty on decision takers in respect of development that would affect a listed building (designated heritage asset for the purposes of the NPPF). This creates a statutory requirement to give special attention to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Following high profile decisions in the courts, including Barnwell and Forge Fields 	<p>The plan cannot address matters regarding planning applications. Requirements placed on planning authorities at the planning application stage differ from those involved in the plan-making process, this relates to having a proportional evidence base.</p> <p>Detailed assessment of potentially adverse impacts including on historic assets and setting would normally be carried out as part of the planning application process. The methodology notes that such detailed investigations are not considered proportionate to the plan-making process.</p>
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		<p>case, it also means that considerable weight must be given to any harm to the designated heritage assets identified when making planning decisions. As “less than substantial harm” has been identified to Slade Farm this requires that test of paragraph 134 of the NPPF to be engaged and that the identified harm is outweighed by the public benefits of the application. Such “public benefits” are discussed within the Planning Policy Guide (PPG), paragraph 20 (Paragraph: 020 Reference ID: 18a-020-20140306 Revision date: 06 03 2014). Here the PPG states that public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress. However, it clearly states that they should flow from the proposed development and should be of a nature and scale to be of benefit to the public at large and not just a private benefit. The benefits arising from the proposed allocations are questionable at the least - given the potential harm to the Green Belt and fact that the sites do not need to be allocated to meet the recognised need to maintain a steady and adequate supply of sand and gravel over the Plan Period. However, it remains essential that in applying the tests in paragraph 134, which is expressed in terms of a balance rather than expressly referring to issues of weight and significance, the approach of the decision maker is consistent with the statutory obligation under Section 66(1). Thus the question should not be addressed as a simple balancing exercise of harm versus public benefits, should any be identified, but whether there is justification for overriding the presumption in favour of preservation of the Slade Farm or its setting.</p> <p>The less than substantial harm identified to</p>	<p>Minerals can only be worked where they are found. The provision of aggregates is a public benefit.</p> <p>Potentially adverse impacts were determined to be (as noted previously) “less than substantial” not significantly adverse.</p>
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		<p>Slade Farm and the need of the decision maker to give that harm considerable importance and weight and the interpretation that NPPF paragraph 134 is a policy of restriction means that the proposed allocations will result in a significant adverse effect on the significance and setting of Slade Farm. As there are public benefits which the decision maker in this case could weigh against the harm identified, the proposed allocations are clearly contrary to the NPPF (paragraph 134).</p> <p>Green Belt</p> <p>The Stage 1 site assessments carried out for M6: Slade Farm North (Hedgerley) and M7: Slade Farm South (Hedgerley) note that the sites are within the Green Belt but then go on to state that “in line with Government guidance mineral sites are permitted within Green Belt areas” and accordingly awards the site a green flag (i.e. fully in compliance / no constraints identified) in relation to that consideration. This approach is flawed since the Government policy being paraphrased is actually that unless i) the openness of the Green Belt can be preserved and ii) there is no conflict with the purposes of including the land within Green Belt, mineral extraction is to be held as inappropriate in the Green Belt unless the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (‘very special circumstances’). As these tests were not applied, the findings of the above two Stage 1 site assessments are invalid in these respects.</p> <p>The site assessments also failed to apply the test of “any other harm” as set out in NPPF paragraph 88. Recent planning case law (see Redhill Aerodrome Limited v Secretary of State for Communities and Local Government,</p>	<p>The allocations are for mineral extraction, as per the NPPF this form of development is not inappropriate, provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt (NPPF para 90). Other forms of development would be assessed against the plans policies and the NPPF – in particular para 87-90.</p>
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		<p>Tandridge District Council, Reigate and Banstead Borough Council [2014]) has established that the inclusion of this wording extends the concept of 'harm' in the Green Belt to include all adverse planning and environmental effects – not just those which relate to appropriateness.</p> <p>Had this test been applied and the likely effects on the setting of the Listed Buildings at Slade Farm been taken into account as an instance of "other harm" it is apparent that a Stage 2b assessment ought to have been carried out and that (given the points made under the side heading "Listed Buildings" above) that this further assessment would have found that neither site M6: Slade Farm North (Hedgerley) or site M7: Slade Farm South (Hedgerley) justify inclusion as proposed site allocations.</p> <p><i>Required action</i></p> <p>Proposed Policy 4: Allocated Sites for Sand and Gravel Provision (and preceding sections 4.46 and 4.52) should be amended so as to delete all reference to site allocations at M6: Slade Farm North (Hedgerley) (1.25Mt) and M7: Slade Farm South (Hedgerley) (1Mt).</p>	<p>NPPF para 88 applies to planning applications not the plan making process. The identification of a mineral extraction site within the green belt is not considered to make the site unacceptable as such impacts can be avoided and or minimised to acceptable levels.</p>
Iver Parish Council	Yes		Noted.
Radclive cum Chackmore Parish Council	Yes		Noted.
Thornborough Parish Council		<p>In response to the Buckinghamshire County Council Minerals and Waste Draft Plan which is out for consultation, Thornborough Parish Council would like to point out the following:</p> <p>On page 38 it says:</p> <p>'4.54 Nevertheless, the intention is to have some balance to production in the county to reflect that much of the county's growth is to take place in the northern half of the county, notably at Aylesbury but also at Buckingham. An allocation</p>	<p>The proposed allocation falls within four parishes, with the majority being within Leckhampstead and Foscott and so these were referenced only, but it is accepted that the allocation also includes parts of Thornborough and Maids Moreton parishes. This is therefore to be noted in the MWLP.</p> <p>4.56 An allocation is to be made in the MWLP to contribute towards meeting the provision of 2.52Mt in the secondary focus area of the Great Ouse Valley. This is at Hydelane Farm on an <u>(located at the boundary</u></p>

		<p>is to be made in the MWLP to contribute towards meeting the provision of 2.52Mt in the secondary focus area of the Great Ouse Valley. This is at Hydellane Farm on the boundary of Leckhampstead and Foscott parishes, east of Buckingham and will provide 1Mt towards the provision figure.'</p> <p>There is no mention of 'Thornborough' in this page, or indeed throughout the entire document despite the fact that this area is not only on the borders of Thornborough Parish but actually partly in Thornborough Parish as evidenced by the map of this area on Page 133. Thornborough Parish Council are concerned at this and we believe other inaccuracies in the draft document</p>	<p><u>junction of Leckhampstead, and Foscott, Maids Moreton and Thornborough parishes and bordering Thornton parish), east of Buckingham, and will provide 1Mt towards the provision figure. Other site(s) are to come forward as appropriate to meet the provision and will be determined under Policy 5 relating to proposals for the extraction of minerals from unallocated sites (including extensions to existing sites and extensions to allocated sites).</u></p> <p>It would have been helpful if the parish council could have stated what they consider the other inaccuracies were.</p>
Historic England		<p>Whilst Historic England does not necessarily object to primary focus being on sites within the Thames and Cole Valleys, the Thames gravels in some areas are an unusually rich area for the preservation of sites of pre-historic, Roman and Anglo-Saxon archaeology. Careful consideration should therefore be given to the potential for archaeological remains on any site proposed for extraction. Given that the true potential for Palaeolithic archaeology is unlikely to be represented on the Historic Environment Record, owing to depth of burial and lack of previous investigation, this aspect of archaeology is likely to require specific assessment by a specialist familiar with the period to provide a robust evidence base. It should be noted that the dewatering of extraction sites may have adverse impacts on nearby waterlogged deposits. The County Archaeologist should be able to advise further. Subject to the views of the Chilterns Conservation Board, we support the encouragement of the production of Chiltern</p>	<p>Noted.</p> <p>Noted.</p>

		<p>bricks to promote local identity in the wider Chiltern area.</p> <p>We have assessed each of the proposed minerals sites against our records of designated heritage assets. Whilst we have not identified any “showstoppers”, we note that some of the sites are in close proximity to listed buildings. The operation and restoration of these sites should have regard to the setting of these listed buildings. The site at Hydellane Farm, Leckhampstead/Foscott, includes part of the Buckingham Arm of the Grand Union Canal. Although not scheduled, this should be considered as a heritage asset and therefore retained.</p>	<p>Noted.</p> <p>The site assessment will be amended to reflect this (re Buckingham Arm of the Grand Union Canal).</p>
Ministry of Defence		<p>The main safeguarding concern of the MOD with respect to Mineral extraction and waste management developments within Buckinghamshire is the potential threat to flight safety presented by large numbers of scavenging birds being attracted to household waste types that are managed at facilities situated in proximity to the MOD aerodromes. Similarly the MOD would also be concerned by the restoration of mineral workings near aerodromes that would result in the creation of wetland or other habitat features attractive to large or flocking bird species.</p> <p>As you will be aware MOD aerodromes are protected against heightened birdstrike risk within statutory birdstrike safeguarding zones. These identify a circular consultation zone radiating 13 km around aerodromes in which the MOD is consulted upon the development of, waste management facilities and other forms of development that may create an attractant to birds.</p> <p>A further MOD safeguarding concern relates to the siting and design of waste management and</p>	<p>Noted. The MWLP acknowledges aviation safety (Policy 24 and para 7.87). Safeguarding zones have also been taken into account through the site assessments.</p>

		<p>mineral facilities such as incinerators, waste transfer stations and other large structures where such developments by virtue of their dimensions and the materials used in their construction might cause a physical obstruction to air traffic approaches, cause interference to transmitter/receiver facilities and meteorological radar installations.</p> <p>The allocated sites noted for Sand and Gravel provision and the MOD statutory safeguarding zones they occupy are as follows: New Denham Quarry, Denham: RAF Northolt Aerodrome height 91.4m and birdstrike George Green, Wexham: Northolt Aerodrome height 91.4m and birdstrike All Souls Farm Quarry, Wexham: RAF Northolt Aerodrome height 91.4m and birdstrike Park Lodge Quarry, Iver: RAF Northolt Aerodrome height 45.7m and birdstrike Denham Park Farm, Denham Green: RAF Northolt Aerodrome height 91.4m and birdstrike North Park, Richings Park, Iver: RAF Northolt Aerodrome height 91.4m and birdstrike Slade Farm North and South, Hedgerley: RAF Northolt Aerodrome height 45.7m</p> <p>The MOD maintains no safeguarding objections to these areas being identified as preferred areas for sand and gravel extraction. However we would wish to be consulted on any developments in accordance with the statutory safeguarding procedure to ensure development undertaken at these sites does not affect the operation of aerodrome and technical facilities.</p>	
Brett Aggregates Ltd		<p>We have previously promoted a site at Trenches Farm, in South Buckinghamshire. It is our view that this site should be allocated to ensure that sufficient sand and gravel is available to the end of the Plan period, plus 7 years, in order to comply with the key policies within NPPF.</p>	<p>The MWLP allocations in the Thames and Colne Valleys with only two exceptions (one of which is related to extracting material that would otherwise be sterilised by the Western Rail Link to Heathrow) are extensions to existing sites. Trenches Farm is a standalone site and not an extension to an existing</p>

			operation. Nevertheless it could be allocated through a later review/partial review of the MWLP or come forward through the planning application process at a later stage of the plan period if there is an issue of a low landbank at that time.
CEMEX		CEMEX welcome the identification of land at North Park, Richings Park as a site allocation in the MWLP. CEMEX are soon to commence on site operations for extraction of the 2mt of sand and gravel prior to the Network Rail proposal and welcome the allocation of the land to the SW of the site for the provision of an additional 1mt.	Noted.
Quattro	No	<p>There is a general over-riding objection to the MWLP, particularly in the context of identification of preferred sites to be allocated for sand and gravel extraction. The call for sites exercise had a closing date of 2 April 2015. That is over 2.5 years ago. The site selection process is based on information that is considerably out of date and to ensure the robustness of the evidence base in moving forward to the “preferred options” stage BCC should have undertaken a second round “call for sites” exercise. In considering the National Planning Policy Framework (NPPF) tests of soundness, it is considered that as the plan currently stands it is not ‘sound’ as it has not been ‘positively prepared’ nor is it ‘justified’, given that it proposes taking forward site allocations which is not based on an up-to date evidence base. If a call for sites exercise had been undertaken in the last 6 months it would, no doubt, have resulted in a range of different sites coming forward – which should be considered and assessed comprehensively prior to a final decision being made on sites to be taken forward to Preferred Options.</p> <p>It is noted that BCC has invited responses in</p>	<p>It is difficult to see how the MLP would have changed if there had been a more recent call for sites exercise to follow up the one held in Spring 2015. The Briefing Note on Minerals Provision set out the approach taken. The respondent is supporting one site previously assessed (Rowley Farm) and a new large site (Mansfield Farm) in an area adjacent to an operational site but where there been a major extension in the opposite direction approved through the grant of planning permission and an allocation without planning permission identified in the MWLP. The respondent could have, if they had so wished, put forward the Mansfield Farm site in the period between the issues and options and preferred options consultations if they considered it was of a scale/importance that it was likely to have a bearing on the overall site assessments.</p> <p>All sites submitted previously and through the draft</p>

		<p>terms of 'other suitable locations for mineral extraction not already identified in the plan'. Whilst this is not an ideal solution to the problem - of the untimely delay between call for sites and preferred options consultation – it is none-the-less welcomed. Albeit that BCC are urged to reconsider their approach. Notwithstanding this, sites put forward at this stage need to be considered on the same basis as previous submissions, and we would look to BCC to provide assurance that the fact sites are already identified under draft Policy 4, or the fact that they are at appeal (i.e. Slade Farm North), or the fact that BCC have a stated intent to move to a Regulation 19 consultation stage quickly will not pre-determine the outcome of this consultation process and ensure that alternatives are robustly considered. If the Plan is to be found ultimately 'sound' it will need to demonstrate that the approach taken (i.e. sites allocated) are 'justified' and comprise the most appropriate strategy when considered against the reasonable alternatives.</p> <p>As detailed below, and as discussed with BCC at a meeting held on 13 September, 2017, Quattro are putting forward one new site not previously considered by BCC, comprising land at Mansfield Farm, as well as objecting to the fact that a site which was previously proposed has not been taken forward, this comprises land at Rowley Farm. Post submission of these representations, Quattro will engage with BCC with regard to land at Mansfield Farm – to ensure BCC have all the information they require to fully consider that proposed site. They also propose to engage with BCC with regard to ensuring that they have all information they require to consider again the proposed land at Rowley Farm.</p>	<p>plan stage will be assessed as per the site assessment methodology. Nevertheless at this stage and bearing in mind the soundness references, including that of the most appropriate strategy when considered against the reasonable alternatives, does mean that there is a high bar in relation to proving that alternative sites are more appropriate than ones chosen especially when the examination process takes as the starting point that the planning authority has submitted a sound plan.</p>
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		<p>In terms of the in-principle objections to the BCC MWLP POC, the second point of objection which is raised is that whilst the proposed plan period is a long one, as currently proposed the Plan would not provide for a 7 year landbank at the end of the Plan period which it is considered, under the provisions of the NPPF, that it should do.</p> <p>Further, a number of the potential site allocations, as well as those now being promoted by Quattro, are in very close proximity to the County Boundary and as the Technical Annex – Site Assessments confirms will not only serve growth in the County but also surrounding authorities. If this is the case, then there is clear support for having a greater than 7 year landbank in place and if appropriate sites are identified then allocating a greater number of sites for sand and gravel extraction to make sure NPPF requirements for a steady and adequate supply of aggregates is fully justified.</p> <p>Quattro would also raise significant concerns with regard to the MWLP POC as currently drafted which whilst identifying 7 sites in the Thames and Colne Valley (under draft Policy 4), is in reality only allocating 4 areas, in that the three Denham sites are all linked to the same site/operator and similarly the Slade Farm sites are effectively the same site and the same operator. This has the clear potential to stifle competition and detrimentally affect the steady and adequate supply of aggregates, contrary to NPPF requirements to ensure that “large landbanks bound up in very few sites do not stifle competition”.</p> <p><i>Approach to Identification of Potential Allocation Sites</i></p> <p>The stated intent of Strategic Objective SO3:</p>	<p>Minerals Local Plans are not required to have allocations to account for a seven year landbank at the end of the plan period. The plan can address this matter in general policy that allows non-allocated sites to come forward (which the MWLP does) but in any event the plan will be reviewed well before this becomes an issue. DCLG now considers a plan more than five years old to be out of date so this implies relatively early reviews of adopted plans.</p> <p>Although sites can and do serve areas beyond the minerals planning authority’s boundaries, the provision figure should not be directly linked to making such provision unless these places are unable to provide for their own needs; this is not the case here.</p> <p>The LAA accompanying the Preferred Options MWLP lists in Table 3 operational sites in 2015. Four companies were involved in these sites. The four ‘allocation’ areas referred to by the respondent plus the permitted/operational sites of Denham Park and George Green would likely mean a larger number of operators in the area than in 2015.</p>
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		<p>Facilitating the Delivery of Sustainable Minerals Development is, amongst other things, to seek the improved use or extension of existing sites in Buckinghamshire before considering new locations in order to maximise recovery of the resource. However, Policy 2, Spatial Strategy for Minerals Development, simply sets out a spatial strategy which focuses sand and gravel extraction in the Thames and Colne Valleys with a secondary focus in the Great Ouse Valley east of Buckingham. Policy 3, Sand and Gravel Provision, confirms that provision will come from both extensions to existing sites and from new sites in line with the spatial strategy.</p> <p>Review of The Technical Annex – Site Assessments (August 2017) is clear in identifying that BCC, in their site selection, have worked on the basis that “preference given to sites linked to existing operations because they can maximise use of existing processing and related infrastructure”.</p> <p>On the above basis, the MWLP POC raises two issues. First S03 and the approach taken in the Technical Annex do not fully accord with Policy 2 and Policy 3. Second, that if extensions are the preferred approach in the first instance then Rowley Farm and Mansfield Farm should have been considered ahead of the potential allocation of Slade Farm North and Slade Farm South which would comprise stand-alone allocations. Even if this were not the case there are other considerations which would support the consideration of Rowley Farm and Mansfield Farm ahead of Slade Farm North and South. As detailed below Rowley Farm should have been considered as an extension to All Souls Farm Quarry and Mansfield Farm should have been considered as an extension to New Denham.</p>	<p>Rowley Farm- If Rowley Farm was considered to be a natural extension to All Souls Farm then it would perhaps have been expected for the Call for Sites response to have specifically stated this. It is accepted that this large site is at its far south the other side of Wexham Park Lane from the All Souls Farm site but its scale and that it was not put forward as an extension location meant that it was not considered as a natural ‘extension’ site. It therefore has to be seen as a standalone site. The MWLP does allocate more than just extension sites and this allocation could have been allocated as a standalone site. However sites at Richings Park and at Slade Farm had more merit generally- the former due to the prevention of sterilisation of resources by the construction of the Western Rail Link to Heathrow and the latter being a long standing potential site where agent/operator support was such that a planning application had been</p>
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		<p>In the context of how preference for sites is considered in the Technical Annex – Site Assessments (i.e. sites linked to existing operations because they can maximise use of existing processing and related infrastructure) it is noted from an industry/operator perspective (exemplified by Quattro) the key factors which make sites attractive are 1) the quality of the mineral reserve and 2) good access to the road network. Given the life of many of these operations, and the returns, investing in plant is much less of a key factor, and of course plant can be relatively easily moved and could well be relocated by an operator from operations they have outside of the BCC authority area. As already highlighted reliance on extensions based on the ability to potential utilise existing on site infrastructure is potentially anti-competitive.</p> <p>In identifying sites for allocation under draft Policy 4 more refined and detailed consideration should have been given to the quality of material which the allocation sites would provide. Advice provided by a land surveyor to Quattro with regard to the proposed allocations at Slade Farm North (M6) and South (M7) is that this is characterised as a very silty deposit with poor stone content. As such the material is not considered suitable for concrete manufacture, although is suitable for other construction related works where strength would not necessarily be an issue.</p> <p>This same issue arises with the allocation of land at Springfield Farm South (M1), the mineral resource here comes from the same vein as that for Slade Farm North and South. Quattro have previously taken material from this quarry and confirm issues with its suitability for use in concrete batching. Material taken from this site</p>	<p>submitted. Furthermore with Rowley Farm being assessed on the site put forward at the Call for Sites stage (rather than say if the site proposer had put forward a smaller area excluding the more sensitive areas to the north and making the case for the southern area to be seen as a natural extension to All Souls Farm), plus a new quarry going ahead at George Green nearby there was no compelling reason to allocate Rowleys Farm.</p> <p>Mansfield Farm- This large site could be a longer term extension for New Denham but there is an extension site for New Denham identified in the Preferred Options MWLP (New Denham North West Extension) and it is not considered there are any particular merits for excluding the New Denham North West allocation from the Proposed Submission MWLP in favour of part of the Mansfield Farm location.</p> <p>There is no national planning guidance that prioritises higher quality resources over lower quality resources in relation to site allocation. The key determinant in relation to quality of resources and site allocations is whether a site can be brought forward by the industry. In the case of Slade Farm it is clear that there has been longstanding support to the extent that planning applications have been submitted.</p>
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		<p>by Quattro has only been able to be used for other construction purposes and in particular as trench fill for backfilling around cables/water mains.</p> <p>Table 1, Proposed Allocations in Preferred Options MWLP and Proposed Quattro Sites, attached at Appendix 1, provides further consideration of all potential allocation sites under draft Policy 4 as compared to the proposed Quattro sites at Rowley Farm and Mansfield Farm. Further information on the Quattro proposed sites is provided below.</p>	
Springfield Farm Limited		<p>We write in support if the continued inclusion of site M1 – Springfield Farm South (2mt) within Policy 4 of the Draft BCC Minerals and Waste Local Plan 2016-2036.</p> <p>As noted at Para 4.45 of the draft plan, the existing quarry at Springfield Farm already has the benefit of planning permission. The quarry site is strategically located and the quarry continues to operate successfully, helping to meet the required provision for sand and gravel within Buckinghamshire.</p> <p>As noted in Para 4.48, the proposed allocation at Springfield Farm South has previously been allocated within the BMWLP 2006. The site represents a logical extension to the existing quarry at Springfield Farm and is considered to contain an economically viable deposit of minerals suitable for working. The site is likely to be brought forward during the plan period as existing consented reserves are worked out. It is therefore considered imperative that the site be carried forward for inclusion within the BCC Minerals and Waste Local Plan 2016-2036 and, indeed there are no reasons why the allocation should be removed at this stage.</p>	Noted.

Are there any other suitable locations for mineral extraction not already identified in the plan?

<i>Respondent</i>	<i>Comment</i>	<i>Planning authority response</i>
M & K Orchard	I am aware that there are plenty of local developers who have suitable land that can be used for gravel extraction including operators such as Grundons.	A call for sites process was undertaken and additional sites invited to come forward during the draft plan stage; all sites brought forward have been assessed as per the site assessment methodology. In addition sites could be submitted at the Preferred Options stage- although only one new potential site was been put forward at that stage.
Mr Tom Webb	Opening the BCC owned land at Denham would be preferable on environmental and access grounds. The Springfield site has far more reserves that could be accessed in the time span of the plan.	Land at New Denham has been identified that will, if implemented, extend extraction here through the plan period. Likewise the Springfield Extension. There are other locations required beyond these two.
Gerrards Cross Town Council	No	Noted.
Brett Aggregates Ltd	Yes. The previously promoted site at Trenches Farm, South Buckinghamshire.	The MWLP allocations in the Thames and Colne Valleys with only two exceptions (one of which is related to extracting material that would otherwise be sterilised by the Western Rail Link to Heathrow) are extensions to existing sites. Trenches Farm is a standalone site and not an extension to an existing operation. Nevertheless it could be allocated through a later review/partial review of the MWLP or come forward through the planning application process at a later stage of the plan period if there is an issue of a low landbank at that time.
CEMEX	CEMEX is disappointed that the land at Taplow, that was promoted by CEMEX in the call for sites is not included as an allocated site. CEMEX consider that this is a suitable site for sand and gravel extraction and whilst the allocation of sites makes provision for the plan period of a minimum landbank of seven years over the plan period. No analysis has been undertaken of the productive capacity of the existing sites and those allocated. Many of the existing sites have a restriction on their annual capacity due to planning conditions which restrict production for amenity or transport reasons. Many of the allocated sites will follow on from those permitted and therefore even with the allocated sites it is not clear whether this will	The MWLP allocations in the Thames and Colne Valleys with only two exceptions (one of which is related to extracting material that would otherwise be sterilised by the Western Rail Link to Heathrow) are extensions to existing sites. Taplow is a standalone site and not an extension to an existing operation. Nevertheless it could be allocated through a later review/partial review of the MWLP or come forward through the planning application process at a later stage of the plan period if there is an issue of a low landbank at that time.

	<p>allow for an increase in sales to meet future infrastructure and housing demands.</p> <p>CEMEX would welcome from Buckinghamshire County Council some analysis of productive capacity and when allocated sites are likely to come forward to see whether additional new sites such as Taplow should be added allocated to the allocated sites list. The Taplow site as promoted in the Issues and Options – Call for Sites consultation contains some 3 million tonnes of sand and gravel, which if worked would be at a rate of 400,00tpa. Whilst it may not be necessary to allocate the entire 3 million tonnes Taplow deposit within this plan, allocation of part of the reserve may ensure that the production of sand and gravel is maintained for the plan period and a steady and adequate supply provided. The site of the landbank and a minimum 7 year supply is only one of the considerations that authorities should take into consideration to ensure that a steady and adequate supply of minerals is delivered. CEMEX would welcome further talks on this matter.</p>	<p>The Council undertook this exercise prior to the preferred options consultation and has updated it since (it is an internal document using commercially confidential information). What this has shown both times is that there are a number of commitments that create a bulge in supply until the early 2020s if all sites are worked at the same time. However it is not certain how many of these will actually be worked concurrently especially bearing in mind uncertainty over the construction industry's prospects. Nevertheless there should not be new sites granted until the early 2020s due to the level of commitments. It should be noted that a rate of working of 0.4 mtpa is effectively 50% of the annual provision required in the MWLP for the Thames and Colne Valleys.</p>
<p>Quattro</p>	<p><i>Quattro Proposed Site Allocation for Sand and Gravel Provision Rowley Farm (Sites 1 and 2)</i></p> <p>Quattro are the operator of All Souls Farm Quarry (Wexham). To date they have finished the approved extraction and are forming the last cell for landfilling. They own and operate the processing and recycling plant currently located on-site. All Souls Farm Quarry comprises an "Allocated Site for Sand and Gravel" as identified in the MWLP POC which benefited from planning permission as of 1 January, 2016.</p> <p>Quattro are in discussions with Carter Jonas (agents for Buckinghamshire County Council) with regard to exploring the potential for taking forward mineral extraction on land immediately adjoining, and as an extension to, All Souls Farm Quarry. This proposed extension area is referenced by Quattro as Rowley Farm Site 1 and Rowley Farm Site 2. Carter Jonas, on behalf of BCC, previously made submissions to the Regulation 18 Consultation and specifically the "Call for Sites" (in April 2015) putting forward Rowley Farm Sites 1 and 2 for consideration as site allocations in the MWLP. Carter Jonas have confirmed to Quattro that they are fully supportive of them further progressing those submissions, and promoting the</p>	<p>Information regarding the Rowley Farm site 1 and 2 was submitted by Quattro in response to the Draft Plan consultation. This information has been taken into account with site assessments undertaken accordingly. The outcome of which is that, when compared to the proposed allocations set out in the Draft Plan the Rowley Farm site is not considered appropriate to take forward as an allocation through displacing these allocated sites. The reasoning for this is that there is sufficient provision based on the commitments for the short to medium term. The working of the Rowley Farm site as an extension to All Souls Farm quarry would have to mean that the proposed site would (with All Souls Farm closing in 2017) have to have commenced working immediately if it was to be counted as an extension to an existing site rather than a standalone site in close proximity to a previously worked out site. This would create a significant over provision. In line with seeking to provide a steady and adequate supply of aggregates there is no need for an additional site in the short to medium term.</p>

	<p>inclusion of Rowley Farm in the MWLP as an allocated site for sand and gravel provision.</p> <p>Plan 1, Proposed Quattro Allocations at Rowley Farm, is attached at Appendix 2 to this statement -which identifies the extent of the allocated All Souls Farm and the proposed Rowley Farm Site 1 and Site 2.</p> <p>The Carter Jonas Call for Sites submission provides further details for Rowley Farm (and should be read in conjunction with this submission).</p> <p>The Technical Annex – Sites Assessment, provides very brief and unclear explanation as to why Rowley Farm was not taken forward (page 394). In response, and by means of an amended Stage 1, Screening Assessment, Site Summary (as originally provided at page 45 of the Sites Assessment) it is confirmed:-</p> <p><i>Rowley Farm</i> Location: Wexham, Slough, Buckinghamshire, SL3 6DR Area: Approximately 132 ha (divided into two parcels) Proposed Use: Sand and gravel extraction 3Mt</p> <p><i>Site Summary</i></p> <ul style="list-style-type: none"> • The site has potential to make a significant contribution (3Mt sand and gravel) towards achieving the plans vision and objectives and is located within the primary focus areas, and would be in compliance with key Policies 2 and 3. • It would comprise an extension to an existing site: All Souls Farm, able to make use of existing good access to the road network and potentially the relocation of processing/recycling plant currently operated by Quattro at All Souls Farm. • If appropriately phased with the proposed allocation at Mansfield Farm – the proposed operator could relocate their operational processing and recycling plant currently in use at All Souls Farm to be used first at either Rowley Farm and then Mansfield Farm or vice versa. • Site is located within the primary area of focus. The site has been put forward by the proposed operator with the support of the site owner. 	
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	<ul style="list-style-type: none"> • Located in the south-east of the county and part located on the county boundary adjacent to Berkshire and in proximity to Greater London, likely that it will serve growth in the county and surrounding authorities. • Strategic location reduces transport distance to potential market base (growth area) • Site is located in proximity to: Langley Park Registered Park and Gardens and Stoke Place Registered Park and Gardens, Stoke Poges Framewood Road and Conservation Area and Black Park SSSI. The consented quarry at All Souls Farm has an existing similar relationship with these sites of historic and other interest and has been able to be effectively quarried and largely restored. • Potential to mitigate potentially adverse impacts/environmental nuisance <p>On the basis of the above, detailed consideration should be given to the inclusion of part or all of this site as an allocated site for the provision of sand and gravel either in preference to or in addition to the currently proposed allocations under draft Policy 4.</p> <p><i>Quattro Proposed Site Allocation for Sand and Gravel Provision - Mansfield Farm (Sites 1, 2 and 3)</i></p> <p>Quattro are at the time of writing finalising the acquisition of an interest in land known as Mansfield Farm, Iver. The land is in the ownership of Buckinghamshire County Council, Quattro will shortly be completing a fixed lease on the land (anticipated this will be completed on 29th September, 2017). The bid Quattro made for the lease on the land included confirmation of their intention to research and investigate, over the term of the fixed lease the potential for mineral extraction on the site in conjunction with Buckinghamshire County Council. This was the basis on which the bid was accepted.</p> <p>Quattro have confirmed to Carter Jonas, who are again the agents acting for BCC in respect of the Mansfield Land Farm land, that they are making submissions to the Buckinghamshire MWLP POC for the purposes of promoting the land as an allocated site for sand and gravel provision, in accordance with the terms of the bid they made for the lease of</p>	<p>Mansfield Farm- This large site could be a longer term extension for New Denham but there is an extension site for New Denham identified in the Preferred Options MWLP (New Denham North West Extension) and it is not considered there are any particular merits for excluding the New Denham North West allocation from the Proposed Submission MWLP in favour of part of the Mansfield Farm location.</p>
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	<p>the land.</p> <p>The land at Mansfield Farm lies immediately adjacent to New Denham Quarry (Denham) which comprises an Allocated Site for Sand and Gravel Provision as identified in the MWLP POC which benefited from planning permission as of 1, January 2016. It is also identified in the BCC Minerals and Waste Plan (2004-2016).</p> <p>Plan 2, Proposed Quattro Allocations at Mansfield Farm, is attached at Appendix 3 to this statement -which identifies the extent of the Allocated New Denham Quarry and the proposed Manor Farm Sites (1, 2 & 3). It also identifies allocations proposed under draft Policy 4 comprising extensions to New Denham Quarry and referenced as Sites M2, M3 and M4. A site summary for Rowley Farm is detailed below – and as noted in the introduction to this statement Quattro will be engaging shortly with BCC to identify what further information is required by them to further consider the potential allocation of this site.</p> <p><i>Mansfield Farm</i> Location: Iver, Buckinghamshire Area: Approximately 124 ha (divided into three parcels) Proposed Use: Sand and gravel extraction - c 7.65Mt</p> <p><i>Site Summary</i></p> <ul style="list-style-type: none"> • The site has potential to make a significant contribution even in part (c 7.65Mt sand and gravel across three land parcels) towards achieving the plans vision and objectives and is located within the primary focus areas and would be in compliance with key polices 2 and 3. • It would comprise an extension to an existing site (New Denham). • If appropriately phased with proposed allocation at Rowley Farm – the proposed operator could relocate operational processing and recycling plant currently in use at All Souls Farm to be used first at either Rowley Farm and then Mansfield Farm or vice versa. • Location of site is such that it would be able to make use of good access to the road network. There is an existing bridge link over the M25 between Site 1 and Site 3. • Site is located within the primary area of focus. The site has 	
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	<p>been put forward by the proposed operator with the knowledge of the site owner.</p> <ul style="list-style-type: none"> • Located in the south-east of the county in close proximity to the county boundary and Greater London, likely that it will serve growth in the county and surrounding authorities. • Strategic location reduces transport distance to potential market base (growth area) • There are likely to be listed buildings, Conservation Areas and other sensitive locations in the surrounding area to the site. These will be similar to those already identified for potential allocations (M2, M3 and M4) as currently proposed as extensions to New Denham and indeed to New Denham itself which has already been effectively quarried and partially restored. • Potential to mitigate potentially adverse impacts/environmental nuisance <p>On the basis of the above detailed consideration should be given to the inclusion of part or all of this site as an allocated site for the provision of sand and gravel either in preference to or in addition to the currently proposed allocations under draft Policy 4.</p>	
Summerleaze Ltd	<p>Summerleaze are promoting the Barge Farm site as a replacement to their currently operational Berry Hill, Taplow site which is due to be exhausted at the end of 2018.</p> <p>The Barge Farm site would represent a replacement sand and gravel operation and would continue to provide high quality sand and gravel to the local market.</p> <p>Barge Farm has been considered in the preparation and review of previous Mineral Plans.</p> <p>The site contains 1.4 million tonnes of high quality sand and gravel within an area of 20 hectares.</p> <p>The development of Barge Farm would not require a processing plant or heavy goods vehicles (HGVs) to transport the sand and gravel from site.</p> <p>Instead sand and gravel would be transported by barge to the existing Summerleaze Monkey Island Lane processing plant site located approximately 2km to the south.</p> <p>The Monkey Island Lane plant site has permanent planning permission for the importation, processing and sale of sand</p>	<p>Updated information regarding the Barge Farm site was submitted by the current owner and proposed operator, Summerleaze, in response to the Draft Plan consultation. This information has been taken into account with updated site assessments undertaken accordingly. The outcome of which is that, when compared to the proposed allocations set out in the Preferred Options MWLP the Barge Farm site is not considered appropriate to take forward as an allocation through the exclusion of one of these allocations in the Preferred Options MWLP. In addition it should be noted that the operators already have committed sites in the broad vicinity (5 miles) other than Berry Hill that can be operated before moving to this location (one in Bucks, the other in Windsor and Maidenhead).</p>

	and gravel. Details of the Barge Farm site and comments on the site allocation process are included in the attached submission document which contains supporting plans.	
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Mineral Safeguarding

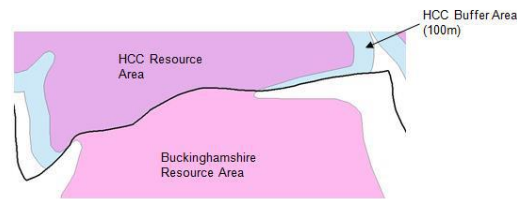
The plan also proposes a revised mineral safeguarding area for sand and gravel and to safeguard clay with flints and limestone. This is to ensure that mineral resources are sterilised by non-minerals development, such as housing or employment sites. The policy sets out what non-minerals developments should demonstrate to ensure mineral resource is not sterilised by the development.

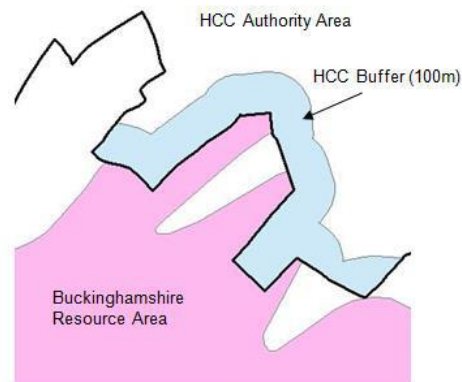
Do you agree with how we have identified safeguarded areas for sand and gravel, clay and limestone?

<i>Respondent</i>	<i>Agree with the proposed MSAs</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	No		As no detail regarding why the identified mineral safeguarding areas are not considered appropriate has been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the methodology for the identification of the mineral safeguarding areas, which is in accordance with national policy and guidance.
Peter Brogden	Yes		Noted.
K Charman	No		As no detail regarding why the identified mineral safeguarding areas are not considered appropriate has been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the methodology for the identification of the mineral safeguarding areas, which is in accordance with national policy and guidance.
Zoe Davis	No		As above
D Harvey	Yes		Noted.
Mr and Mrs Lawani	No		As no detail regarding why the identified mineral safeguarding areas are not considered appropriate has been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the methodology for the identification of the mineral safeguarding areas, which is in accordance with national policy and

			guidance.
M & K Orchard	Yes		Noted.
Mr D Ward	Yes		Noted
Mrs S Ward	Yes		Noted
Tom Webb	Yes		Noted.
Buckingham Canal Society	Yes		Noted.
Chiltern Society	Yes		Noted
Aston Clinton Parish Council	Yes		Noted
Gerrards Cross Town Council	No		As no detail regarding why the identified mineral safeguarding areas are not considered appropriate has been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the methodology for the identification of the mineral safeguarding areas, which is in accordance with national policy and guidance.
Hedgerley Parish Council	Yes		Noted.
Iver Parish Council	Yes		Noted.
Radclive cum Chackmore Parish Council	Yes		Noted.
Hertfordshire County Council		Paragraph 4.17 sets out Buckinghamshire County Council's (BCC) expectation to be consulted on development in neighbouring authorities when development has the potential to sterilise resources that exist within the county. HCC agree with the expectation for consultation, and would like an additional understanding to be stated for HCC to be consulted when proposed non-mineral development in Buckinghamshire has the potential to sterilise resources in Hertfordshire. HCC provided comments in March 2017 regarding HCC's approach to mineral safeguarding in the emerging Minerals Local	This is the intention; for clarity the words "and vice versa" are to be added to the end of para 4.17. Buckinghamshire MSAs include a buffer around the mineral polygons – this is outlined in the methodology, ref para 2.11.

		<p>Plan (which is due for consultation in winter 2017). HCC has currently incorporated a buffer of 100m in the identified MSA/MCA for sand and gravel and brick clay in Hertfordshire. The MSAs identified for Hertfordshire’s mineral resources (including the corresponding buffer) do not extend into the Buckinghamshire authority area (Figure 1).</p> <p>However, in cases where mineral resources were identified outside of Hertfordshire and close to the authority boundary, an appropriate buffer has been identified within Hertfordshire to protect the out-of-county resource (Figure 2). HCC notes that minerals are not restricted by administrative boundaries and considers this approach would protect minerals present on either side of the boundary if applied by both MPAs. It remains our intention to inform Buckinghamshire of consultations on applications that fall in close proximity to the authority boundary which may have an impact on mineral resources and we would like to be consulted on applications in Buckinghamshire that might sterilise mineral resources in Hertfordshire.</p>	<p>The application of policy would be expected to operate in the normal (current) fashion with the prevailing MWLP policy regarding safeguarding of mineral resources of the relevant MPA applied by the relevant districts/boroughs councils where development is within an MSA/MCA. Adjacent authorities are consulted on regarding planning applications that may result in impacts for these areas (as per normal practice).</p>
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HCC seeks clarification as to how any overlap of resources with neighbouring authorities, both at district and county council level would be dealt with and displayed, particularly in regards to the consultation procedure.

Whilst it is noted that Buckinghamshire’s methodology for defining mineral safeguarding and consultation areas states that “buffers extending beyond the MPA’s administrative boundary will be shown on the electronic dataset / mapping layer”, clarification is sought as to whether other administrative areas (i.e. district within Hertfordshire) would be required to show these consultation areas in addition to MSA/MCAs identified by HCC on their policies map, as National Planning Practice Guidance states that “district councils should show Mineral Safeguarding Areas on their policy maps”. The county council has noted that the MSA methodology states ‘where possible, adjoining MPA’s have provided the MSA datasets / layers for their authority areas – this information will be used to inform the identification of MSAs within the County and the extension of MCAs beyond

This was included in the draft method for ease of reference/alignment of MSAs across boundaries, however the final method does not include this. Ref para 4.17:

- MSA/MCA mapping (including associated buffers) for Buckinghamshire will extend up to the county administrative boundary.
- Where made publically available online (e.g. interactive mapping), Buckinghamshire will view the MSA/MCAs of adjoining MPAs to inform the identification of MSAs within the County.

		the MPA's administrative boundary'. Under the current licence HCC holds in regards to BGS data, HCC would not be able to provide MSA datasets. Further discussions will be needed if BCC are to continue with this approach to ensure that both authorities can work together effectively to safeguard minerals resources.	
Oxfordshire County Council		There does not seem to be any provision for the safeguarding of rail infrastructure to support the transport of aggregate minerals, e.g. rail depots. It would seem prudent to include safeguarding of rail infrastructure, as there is a rail depot in Buckinghamshire, for which it is reliant on crushed rock imports as none is produced in the county.	This is addressed in the plan; please refer Policy 27 and (preceding) supporting paragraphs.
Historic England	Yes		Noted
Brett Aggregate Ltd	Yes		Noted.

Do you agree on our criteria for when proposed development will need to comply with Policy 1?

<i>Respondent</i>	<i>Agree with criteria</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	No	Reduce the scale of the proposals	The scale of the proposals is linked to the provision rate and economic viability of extraction. Reducing the yield/size of sites would simply mean that more sites would be required in more areas/additional extensions.
Peter Brogden	Yes		Noted.
K Charman	No	Find another site!	Minerals can only be worked where they are found and are necessary to support sustainable growth. Whilst residents may not be entirely happy with the prospect of an extractive operation within the local area aggregates are necessary to support the growth of the county as a whole and so a wider view must be taken. It should also be noted that a site with economically viable minerals is not likely to just go away – and pushing development away to someone else's

			backyard today is likely to result in it simply coming back around later.
Zoe Davis	No		As no detail regarding why the identified policy regarding mineral safeguarding and consultation areas are not considered appropriate has been provided the Council is unable to provide a detailed response. The draft plan and associated evidence base documents set out the methodology for the identification of the mineral safeguarding and consultation areas, which are in accordance with national policy and guidance.
D Harvey	Yes		Noted.
Mr and Mrs Lawani	No	Please refer to the email from Hedgerley Parish Council to Mr A Sierakowski dated 10 th August 2017 - Copy of email included in comments under first question in relation to minerals provision.	See comments under first question in relation to minerals provision.
M & K Orchard	Yes		Noted.
Mr D Ward	Yes		Noted.
Mrs S Ward	Yes		Noted.
Tom Webb	Yes		Noted.
Buckingham Canal Society	Yes		Noted.
Chiltern Society	Yes		Noted.
Aston Clinton Parish Council	Yes		Noted.
Hedgerley Parish Council	Yes		Noted.
Gerrards Cross Town Council	No		As no detail regarding why the identified policy regarding mineral safeguarding and consultation areas are not considered appropriate has been provided the Council is unable to provide a detailed response. The draft plan and associated evidence base documents set out the methodology for the identification of the mineral safeguarding and consultation areas, which are in accordance with national policy and guidance.
Iver Parish Council	Yes		Noted.
Radclive cum Chackmore	Yes		Noted.

Parish Council			
Historic England	Yes		Noted.
Brett Aggregates Ltd	Yes		Noted.

How can we improve Policy 1 “Safeguarding Minerals Resource”?

<i>Respondent</i>	<i>Comment</i>	<i>Planning authority response</i>
Gerrards Cross Town Council	It should include a clause for sites that are within the Green Belt. This should place emphasis on the amenity value of Green Belt that can be weighed against the need for Green Belt sites to be excavated. It should require a specific need for local use only to outweigh the value of the Green Belt amenity for the residents of the immediate locality.	Safeguarding relates to the non-sterilisation of mineral resources by new development. The Green Belt is addressed in Policy 22.
Iver Parish Council	Although mentioned elsewhere, the recycling of building materials should be encouraged, indeed stipulated insofar as is possible in the planning and building control policies of the Authority.	Noted, this is also addressed in the waste sections regarding CD&E waste.
Aggregate Industries UK Ltd	<i>Policy 8: Rail Aggregate Depots and Wharf Facilities</i> The company objects to this policy as currently drafted. The National Planning Policy Framework (NPPF) expressly requires local planning authorities in preparing Local Plans to safeguard existing, planned and potential rail heads and associated storage and handling facilities for the bulk transport by rail of mineral; and to safeguard 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 material (Page 33, Paragraph 143, bullet point 4). The policy as drafted is unsound; it does not safeguard the existing rail head at Thorney Mill Sidings, Iver, nor seeks to safeguard other sites suitable for use as an aggregates rail head e.g. the former aggregate rail siding at Griffin Lane, Aylesbury.	The aim of Policy 8 is not to safeguard such facilities but to set out under what circumstances such development would be considered appropriate. As such Policy 8 is not unsound – it has simply been taken out of context. Refer to section “Safeguarding of Minerals Development and Waste Management Infrastructure” where other forms of minerals development and associated infrastructure ⁴¹ is defined in footnote 41 as per the NPPF – the footnote states “Other forms of minerals development and associated infrastructure includes: existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials; and existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, secondary and recycled aggregate

	<p>Without specifically identifying safeguarded rail aggregate depots, there is no clear policy based framework for considering development proposals coming forward in the areas surrounding the existing, planned or potential rail aggregate depots.</p> <p><i>Policy 28: Minimising Land Use Conflict</i></p> <p>The company objects to this policy as currently drafted. This policy should also include reference to safeguarded aggregate rail depots whose operations can also be prejudiced by new developments.</p>	<p>material.”</p> <p>Further, Policy 27 safeguards other forms of minerals development and associated infrastructure. This is compliant with the NPPF and so the policy is sound. The intention of Policy 28 is not to safeguard development this is done through Policy 27.</p>
Brett Aggregates Ltd	<p>Ensure that mineral resources are protected from inappropriate development on, or close to future mineral deposits in order to prevent possible sterilisation.</p>	<p>This is the intention of Policy 1.</p>
CEMEX	<p>CEMEX would like Buckinghamshire County Council to reconsider the definition of exempt development within an MSA where it occurs adjacent to or neighbouring a preferred mineral area or existing site as even this exempt development may prevent future minerals development from gaining planning permission because of amenity issues or result in nuisance complaints which would prevent existing operations from continuing.</p>	<p>Development in proximity to permitted mineral extraction sites is addressed in Policy 28. Minerals within a site allocated through the plan that does not have planning permission for extraction are included within the MSA and so are safeguarded under Policy 1.</p>

Waste

The plan sets out a spatial strategy for where waste management should be located. The plan identifies areas within the main urban settlements including High Wycombe, Aylesbury and Buckingham for areas of focus for waste management. These are based on existing employment areas, such as industrial areas, or new large mixed use developments.

Do you agree with focusing waste management around the main urban areas?

<i>Respondent</i>	<i>Agree with locational strategy</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	No		As no detail regarding why the proposed spatial strategy is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
Peter Brogden	Yes		Noted.
K Charman	Yes		Noted.
Zoe Davis	No		As no detail regarding why the proposed spatial strategy is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
D Harvey	Yes		Noted.
Mr and Mrs Lawani	No		As no detail regarding why the proposed spatial strategy is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
M & K Orchard	Yes		Noted.
Ms Paterson	Yes		Noted.

C Prideaux		<p>This whole paper implies a presumption of an increased EFW capacity which is unsound against guesses of regional requirement. What about Ardley's capacity? The road delivery availability is restricted, the rail delivery capacity will be uncertain for years to come because of East/West rail and East/West Aylesbury Spur development to an unknown timetable. The HS2 spoil dumping requirement is unknown and will impinge on Bucks Landfill capacity at Calvert.</p>	<p>The indicative future capacity needs are set out in Table 7; these mostly focus on capacity for recycling and reprocessing materials, inert recycling, composting or other biological processing and to a lesser extent inert recovery/fill and management of hazardous wastes. The MWLP also acknowledges that although the capacity for EfW has been achieved regarding net self-sufficiency, due to commercial arrangements and waste movements there may be a requirement in the future for additional recovery capacity. The waste management targets and resulting capacity needs are not a ceiling limit. Where more waste can be diverted from landfill and greater resource recovery achieved in line with the waste management hierarchy and WFD this is generally supported. The HS2 is not within the scope of the MWLP, however studies have been undertaken regarding disposal requirements and capacity with relevant WPAs providing information and feedback.</p>
Mr D Ward	Yes		Noted
Mrs S Ward	Yes		Noted
Buckingham Canal Society	Yes		Noted.
Chiltern Society	Yes		Noted
Aston Clinton Parish Council	No		As no detail regarding why the proposed spatial strategy is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
Buckingham Town Council	Yes		Noted.
Buckland Parish Council	No		As no detail regarding why the proposed spatial strategy is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.

Gawcott with Lenborough Parish Council	No		As no detail regarding why the proposed spatial strategy is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
Gerrards Cross Town Council	No	We have invested in the Greatmoor incinerator to cater for all the domestic waste for the whole County for 30 years.	Greatmoor deals with a significant element of domestic waste generated in Buckinghamshire but not all of it. Furthermore the MWLP covers all waste generated (e.g. commercial and industrial waste) and not simply domestic waste.
Halton Parish Council	No		As above.
Hedgerley Parish Council	Yes		Noted.
Iver Parish Council	Yes		Noted.
Mentmore, Crafton and Ledburn Parish Council		MPC's particular concern is the traffic generated by rural based waste activities. Mentmore is a sensitive historic village containing numerous dwellings close to the roads passing through the settlement. It contains a number of important listed buildings and almost the entirety of the village is designated as a Conservation Area. This village, along with other settlements in this part of the County, is plagued by excessive and ever-increasing levels of heavy goods vehicles travelling to and from a variety of industrial sites and estates located in the rural area. Many of these estates already contain waste related activities. For example, at the nearby Marsworth Airfield Industrial Estate, there are no fewer than 5 waste activities listed in Appendix 2A of the DPO. HGV traffic generated by these activities regularly travels through the village despite a section 106 obligation to follow a preferred route avoiding Mentmore and Cheddington. This traffic causes considerable damage to residential amenity, to the fabric of the roads and grass verges and is harmful to the character and appearance of	

		<p>the Conservation Area.</p> <p>The DPO identifies primary and secondary areas of focus for new waste management uses which do not include the rural area outside large towns and the major industrial estates. These foci are supported by MPC (although it would strongly object to the inclusion of The Marsworth Airfield Industrial Estate as a secondary area of focus). However, the DPO does give general encouragement to the establishment of new waste management uses on existing industrial sites and other previously developed land outside the areas of focus. While MPC does not object in principle to the establishment of some waste management uses in the rural area outside the areas of focus, it does object to the absence of effective policies and supporting text to ensure the rejection of proposals which cannot demonstrate sustainable transport credentials or would give rise to unacceptable impacts on amenity and/or the historic environment or which would not be subject to legally binding traffic routing restrictions.</p>	<p>New waste management facilities would have to comply with the spatial strategy and development principles set out through the MWLP. Regarding potentially adverse impacts and policies to control and manage these please refer to Section 7 of the MWLP "The Control and Management of Minerals and Waste Development" which includes policies addressing matters raised.</p>
Radclive cum Chackmore Parish Council	Yes		Noted.
Wycombe District Council		<p>We note that the preference is to focus on the main population centres of the county, High Wycombe, Aylesbury, and Buckingham, and we note that information on indicative capacity needs is expressed as a range, opposed to a single hard figure, owing to market forces and presumably uncertainty on which sites waste management businesses may bring forward. We support the overall approach, but would appreciate if more certainty could be provided as to the nature and likely location of waste management facilities, as it has a bearing on the number of sites needed and the locations.</p>	<p>The waste industry is not tied to specific locations in the same way as minerals are (as they can only be worked where they occur). As such the waste industry, and investment/development options, are typically more fluid. Experience of WPAs has shown that site-specific allocations tend to have a lower take-up rate with unallocated sites, or those in designated preferred areas coming forward in place of allocated sites. The NPPW requires WPAs to identify sufficient opportunities to meet the identified needs of their area (S3 NPPW). The approach of identifying areas of focus aligns with national policy. The indicative capacity needs over the plan period set</p>

		<p>Particularly it also has an impact on our need for sites in B2 and B8 uses, set out in the Bucks HEDNA addendum. Our earlier discussions also queried the degree to which waste facilities may actually fall within the B2/B8 use classes and we would like more clarity on the issues.</p> <p>We have reviewed the Waste Needs Assessment and its addendum, but would appreciate a discussion on how the figures presented in tables 7 and 8 have been derived so we may understand how these have been arrived at, and what this might mean in respect of our employment land use needs.</p> <p>We would also like to query the 0.08Mt of composting capacity that is not in use, in order to understand why it is not in use and what the realistic possibility of it becoming operational is.</p>	<p>out in Table 7 are not expressed as a range – the capacity is shown at intervals of 5 years.</p> <p>The method by which waste arising and the need for future management methods have been determined is set out in detail in the Waste Needs Assessment and its Addendum Report. If there are specific issues these should be identified, as it is difficult to give more detail on the method unless the matters being queried are clearly set out.</p> <p>It is a site that has planning permission but is not operational. If the applicants decide not to implement the permission it will expire.</p>
West Berkshire Council		<p>The Spatial Strategy for Waste Management is considered to be logical. It is indicated within paragraph 5.70 that the Plan would allow for proposals to come forward even where the permitted capacity for a specific waste management method has reached or exceeded the indicative capacity needs required to achieve net self-sufficiency, and that under these circumstances proposals would be supported where it is found to be beneficial for regional resource management in line with the waste hierarchy. This sentiment is supported.</p>	Noted.
Historic England	Yes		Noted.
Ministry of Defence		<p>It is noted the primary areas of focus for waste management development will be High Wycombe, Aylesbury and Buckingham.</p> <p>The main MOD statutory safeguarding zone identified within the plan is the Halton Airfield birdstrike zone situated within the area of Aylesbury.</p> <p>Again, the MOD maintains no safeguarding</p>	Noted.

		objections to these areas being identified as preferred areas for waste management development. However we would wish to be consulted on any developments in accordance with the statutory safeguarding procedure to ensure development undertaken at these sites does not affect the operation of aerodrome and technical facilities.	
Brett Aggregates Ltd	Yes		Noted.
FCC Environment		<p>As we discussed at the workshop we do not consider that the stated policy objective of zero non-hazardous waste (which is a broad term covering everything from MSW through to C&I and C&D wastes) from London is realistic or achievable and is also contradictory to existing consented developments (i.e. Greatmoor and Calvert) and conditions on current planning consents which encourage the sourcing of waste via rail. This inevitably means due to the distances required to make rail viable as well as locations of existing rail heads that this waste is more likely to be sourced from out of county and in particular London which is connected to the rail line that runs past the Calvert/Greatmoor site. It should also be noted that a great deal of the materials that are currently coming to the site are sourced from London and in particular these are construction demolition wastes which are used in the restoration of the Calvert Landfill. Any policy which prevents this from continuing will seriously hamper our ability to complete restoration of the site in accordance with the consent and would slow down the speed of completion.</p> <p>From the perspective of the EfW there is a planning condition which encourages us to seek to attract wastes via rail. As the EfW is designed and permitted to deal with residual</p>	<p>The MWLP Policy 13 includes a policy objective of zero non-hazardous waste from London by 2026 in line with the London Plan. This is for disposal to landfill, not for recovery (e.g. EfW processes). It should be noted that Buckinghamshire is required to take account of the London Plan (refer para 5.38-5.39 regarding London Plan targets). Non-hazardous waste is taken as municipal and C&I (as per the London Plan). Import of inert material for restoration purposes is usually taken as beneficial and may be considered recovery. Note para 5.43 states "In line with the London Plan, it is assumed that 20% of London's non-apportioned waste to be exported for disposal to non-hazardous landfill will be received in Buckinghamshire, decreasing to zero by 2026, as set out in the table and illustrated in the graph below. It should be acknowledged that some residual wastes arising as outputs from waste treatment methods are likely to require disposal to landfill, meaning that Buckinghamshire may continue to dispose of London's waste, in addition to its own waste. However, at this stage no information is available on the quantum of residues arising from London that may require disposal to landfill."</p>

		<p>wastes this is most likely to originate as non-hazardous household wastes following separation of recyclables and therefore a policy that prevents the import of these wastes from London would contradict the current objective of this planning condition as it has to be acknowledged that due to existing infrastructure/rail heads, rail routes and the distances involved to make train travel viable that it is very likely that a lot of the wastes would be sourced from London.</p> <p>We therefore suggest that a more realistic policy objective is set that acknowledges the requirements of conditions on existing planning consent and also takes a more holistic view of the benefit of bringing waste in from London via rail i.e. reduces road transport, improves performance and electrical output from the EfW and enables speedier restoration of the landfill. In the instances outlined above it would be more sensible to regard the wastes as <u>materials</u> essential to the operation of the EfW and completion of the landfill.</p>	
Veolia	No	<p>The objection to the Draft Plan relates to the Spatial Strategy and Policy 11 which is considered to be too limiting to deliver the new waste management capacity that is needed. Table 8 of the Draft Plan confirms that the county will need to find between 9 and 17 sites to deliver the new waste management capacity identified in policy 12. To meet this need in a manner which complies with the vision and strategic objectives of the Draft Plan outlined above will require more areas of focus to be identified because of the limited number of site opportunities, particularly in the south of the county. Attached to this representation is the submission of additional information in respect of the current planning application at Wapsey</p>	<p>The spatial strategy set out in Policy 11 allows for quite a wide scope of locations. The areas of focus identified in Table 9 are a refinement of the strategy to provide guidance, however where sites are not able to be identified within these areas by industry the MWLP provides for flexibility through Policy 15 which allows for sites not located within the areas of focus to come forward through the planning application process and under what circumstance such sites would be appropriate. Policy 14 states that new standalone waste facilities should be directed towards the primary and secondary areas of focus. However paragraph 5.87 states that in certain circumstances development outside existing urban boundaries not identified in local plans may be appropriate. The Council acknowledges that there are less areas of focus in the south of the</p>

		<p>Wood which contains details of the extensive search for sites that has been undertaken for Veolia and confirms, as stated in SO4 that there are indeed a very limited number of site opportunities for new waste management facilities.</p> <p>The Draft Plan currently identifies 2 main Areas of Focus in the north of the county (Aylesbury Vale) but only 1 in the south of the county (Chiltern, Wycombe and South Bucks). The spatial strategy is not therefore focussing on the area of the county where the greatest amount of waste is generated and where the need for need for new facilities is – the south.</p> <p>To reflect the population/waste generation split it is considered that two thirds of the main Areas of Focus should be in the southern part of the county. There is therefore a need to identify more main Areas of Focus and it is proposed that one of these should be Wapsey Wood based on the area identified on Drawing PAF1, dated September 2017 attached to this report.</p> <p>In respect of Policy 11 it is considered that it should be amended to refer to all the main towns and settlements within Buckinghamshire as identified in paragraph 2.17 of the Draft Plan.</p> <p>In addition Table 9 of the Draft Plan should have a South Eastern Buckinghamshire Main Area of Focus with the Wapsey Wood site being included as a location and Policy 14 should be amended to refer to all the main towns and settlements listed in paragraph 2.17 of the Draft Plan.</p>	<p>county but the overall quantum of new development to meet indicative capacity needs across the whole county and as set out in Table 8 is not on a major scale.</p>
Cllr Alan Bacon (Chiltern DC)	Yes		Noted.

Do you agree with the use of identified employment areas and new development for the area of focus within Policy 14?

<i>Respondent</i>	<i>Agree with areas of focus</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	No	Destruction around urban areas does affect the quality of life for people living here.	The Draft Plan seeks to secure a good standard of amenity (ref Policy 17) and avoid and/or minimise potentially adverse impacts to acceptable levels (ref Section 7) in line with national policy and guidance.
Peter Brogden	Yes		Noted.
K Charman	Yes		Noted.
Zoe Davis	No		As no detail regarding why the use of employment areas and new development is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
D Harvey	Yes		Noted
M & K Orchard	Yes		Noted.
Mr JG Walker		<p>I wish to register objections to the Waste Transfer proposals for Tingewick Road Industrial area in Buckingham, for the following reasons:</p> <p>The site is not 8ha. It is less than half that, as the eastern half has recently been covered with new houses.</p> <p>Further extensive and major new housing for approx 450 houses has been granted approval to the West of the site.</p> <p>There is existing housing to the east and south, so any change of use would be in a heavily residential area.</p> <p>Part of the site is on a flood plain.</p> <p>Traffic will be unacceptable along Tingewick Road; an extra 1000 people will be using it.</p> <p>Noise from traffic, HGVs will be unacceptable, as will their numbers and speed.</p>	<p>The site listed in Table 9 is the Tingewick Road Industrial Estate as it currently established and this is also the area it was assessed on. The map shown under Appendix 4 on page 130 is incorrect as it also shows an area that is now residential. This is to be corrected.</p> <p>Table 8 of the Draft Plan lists the indicative waste management facilities required to meet the capacity gap identified in the Plan. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably no more than one, if that) coming forward at this location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. Any planning applications for waste</p>

		<p>Noise and smell from the waste operation will be unacceptable across large areas of Western Buckingham.</p> <p>This site does not accord with your stated policies as below:</p> <p>7.21 "sites should be located in relation to their intended end market and minimise transport movements....."</p> <p>7.23 "not result in unacceptable impacts on the community and environment including along transport routes"</p>	<p>management facilities will need to comply with the policies in the MWLP particularly those relating to impact on the environment, amenity and the highway network and also require an environmental permit from the Environment Agency to operate.</p>
Mr D Ward	Yes		Noted.
Buckingham Canal Society	Yes		Noted.
Chiltern Society	Yes		Noted.
Wendover Society		<p>The Society has concerns about the use of the Triangle Business Site for minerals and waste management.</p> <p>Size, Capacity and Visual Impact</p> <p>Further clarification is required relating to the planned size and capacity of the site.</p> <p>The Society looks for the County Council's assurance that such development would not have a negative visual impact on the surrounding landscape and would not result in excessive noise from the site.</p> <p>Congestion and Road Safety</p> <p>In addition, the Society has serious concerns about the effect of increased use of local roads by lorries travelling to the Triangle Business Park from the south of the county, in particular along the A 413 and the Wendover bypass. These are already suffering congestion from an increase in large lorry traffic from HS2 works, and this will become even greater as the building of HS2 progresses. On no account should the waste management lorries be allowed to use a route through Wendover itself. They should certainly be barred from travelling</p>	<p>Table 8 of the Draft Plan lists the indicative waste management facilities required to meet the capacity gap identified in the Plan. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably no more than one, if that) coming forward at this location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. Any planning applications for waste management facilities will need to comply with the policies in the MWLP particularly those relating to impact on the environment, amenity and the highway network and also require an environmental permit from the Environment Agency to operate. A traffic routing plan may need to be agreed to prevent vehicles accessing the site from going through settlements not on the strategic route network.</p> <p>Any development would be on the existing footprint of the Triangle Business Park and potentially using existing building(s), as such it is difficult to see this as significant new development warranting contributions to transport infrastructure beyond the boundaries of the</p>

		<p>down Wendover High Street. There should be restrictions to the hours during which these lorries can travel, and they should not travel at night.</p> <p>Traffic Noise</p> <p>The County Council has promised that any development would be supported by planned improvement in transport and infrastructure. The Wendover bypass already engenders excess traffic noise for Wendover residents, and this would increase with the passage of waste management lorries. The Society asks the County Council to install a low-noise surface on the bypass as a measure to mitigate against this eventuality.</p>	business park.
Aston Clinton Parish Council	Yes		Noted
Buckingham Town Council	Yes	<p>Ref: Tingewick Road Industrial Estate, Buckingham.</p> <p>A considerable proportion of the marked area is now residential and known as Clarence Park. This may render it unsuitable for certain types of facility.</p>	<p>Noted. This was an error in the plan and the residential area was supposed to have been excluded from the boundary for assessment (shown in Appendix 4, page 130). This is to be corrected.</p> <p>Any proposals for waste development coming forward at the Tingewick Road Industrial Estate will need to take account of environmental and amenity impact on the surrounding area including Clarence Park.</p>
Buckland Parish Council	No		<p>As no detail regarding why the use of employment areas and new development is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.</p>
Gawcott with Lenborough Parish Council	No	<p>The sites put forward for the Buckingham area seem to have resulted from a desk survey rather than site investigation. The adjacencies to residential developments, Conservation Areas, damage to landscapes and vistas and the maintenance of the quality of life of residents</p>	<p>All sites/locations were assessed as per the site assessment methodology that involves both desktop assessment and site visits. Site visits were undertaken of sites/designations. However it is accepted there was a mapping error in relation to the Tingewick Road plan. This is to be corrected.</p>

		<p>have not been sufficiently considered.</p> <p>Tingewick Road – The suggested site is adjacent to an existing residential area (Westfield) and a just completed residential development (Clarence Park). It is also contiguous with residential development at Fishers Field. It is within a few hundred metres of a proposed residential development of 400 units and adjacent to the developing University of Buckingham Campus with plans for student housing development. The proposed operation is, therefore, located in or close to a largely residential area rather than an employment area. As a result, this site is unacceptable for the stated purpose and should be removed from the plan.</p> <p>Radcliffe Road, Gawcott – The area suggested is in a small rural area with views across open countryside to the National Trust lands at Stowe. As a result, a waste operation would be visible from Stowe. The BCC’s own report on the site suggests that Radcliffe Road is unsuitable for the traffic which the operation would generate. The site is within 500 metres of the Gawcott Conservation Area (not mentioned in BCC’s own report on the site). The site is also within a few metres of an authorised and permanent Travellers Site with upwards of 30 occupants. There is already a waste plastics recycling operation (no record of authorisation) in Radcliffe Road opposite the site shaded in the Waste Plan Appendix 4. This creates traffic hazards as HGVs load and unload on Radcliffe Road as the site is packed with waste materials and there is insufficient yard space. As the site is in close proximity to and visible from an area of outstanding landscape value (Stowe), within a largely rural landscape and close to the Gawcott Conservation Area, it is unsuitable for the stated</p>	<p>The matters raised are identified in the site assessment and are not considered to be of a nature that would result in the general location being inappropriate. Any site specific proposals would be subject to assessment through the planning application process and must be compliant with the plans policies.</p>
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		purpose and should be removed from the plan. Buckingham Industrial Estate – A section of the industrial site is within the Parish of Gawcott with Lenborough. The BCC’s own report on this site notes it is within 1.5km of the Gawcott Conservation Area. It is also potentially adjacent to an area likely to be developed residentially in the next few years. It is relatively close to existing residences at Meadway and to Badgers Estate and the new Windsor Park/Lace Hill residential development. Traffic generation would place further stress upon the already overstretched A421 through Buckingham. In consequence, the site is unsuitable for the stated purpose and should be removed from the plan.	Buckingham Industrial Estate is a large employment area that is well suited to one or potentially more waste management facilities. The Buckingham Neighbourhood Plan allocates an extension to the industrial estate on to agricultural land and on this basis the Proposed Submission will also include this extension area and list it in Table 9.
Gerrards Cross Town Council	No	We have invested in the Greatmoor incinerator to cater for all the domestic waste for the whole County for 30 years.	Greatmoor deals with a significant element of domestic waste generated in Buckinghamshire but not all of it. Furthermore the MWLP covers all waste generated (e.g. commercial and industrial waste) and not simply domestic waste.
Halton Parish Council	No		As no detail regarding why the use of employment areas and new development is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
Hedgerley Parish Council	Yes		Noted.
Iver Parish Council	No		As no detail regarding why the use of employment areas and new development is not considered appropriate or alternatives have been provided the Council is unable to provide a detailed response. The Draft Plan and associated evidence base documents set out the reasoning for the identification of the spatial strategy.
Radclive cum Chackmore Parish Council	Yes		Noted.

<p>Wooburn and Bourne End Parish Council</p>		<p>“We object very strongly to the Thomas Road option on the following grounds:</p> <ol style="list-style-type: none"> 1. The junction into Thomas Road is partly residential and also dangerous. 2. It is in very close proximity to a Conservation Area. 3. Thomas Road is a narrow road with “pinch points”. 4. It is in very close proximity to a Chalk Stream. 5. There would be the possibility of air pollution to the nearby primary school. 6. Thomas Road is within the flood zone. 7. There is a public footpath adjacent to the rear of the industrial estate. <p>We also object to the M40 Junction 3 Loudwater option on the following grounds:</p> <ol style="list-style-type: none"> 1. The River Wye is close by. 2. There are ancient woodlands nearby. 3. This is an extremely busy junction by the M40 which is often gridlocked. 4. The real possibility of disturbance to an historic environment. 5. Junction 3 is also very close to Conservation Areas. 6. Several listed buildings are in close proximity. 	<p>The site assessment criteria address these matters, however the plan includes policies to avoid and/or minimise potentially adverse impacts to an acceptable level.</p> <p>Table 8 of the Draft Plan lists the indicative waste management facilities required to meet the capacity gap identified in the Plan. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably no more than one, if that) coming forward at this location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities.</p> <p>Any planning applications for waste management facilities at this location will need to comply with the policies in the MWLP particularly those relating to impact on the environment, amenity and the highway network and also require an environmental permit from the Environment Agency to operate.</p>
<p>Chiltern and South Bucks District Councils</p>		<p>Rather than allocating specific sites to meet waste management needs, the draft MWLP seeks to identify ‘areas of focus’ for waste management facilities. The secondary areas of focus include existing general employment areas and areas in waste management use outside of High Wycombe, Aylesbury and Buckingham, five of which are located in Chiltern and South Bucks Districts. Some of these sites are unsuitable for waste developments due to recent changes of use to residential developments, notably within Asheridge Road</p>	<p>That part of the Asheridge Road industrial estate that now has permission for residential development can no longer form part of the employment area. Due to the limited area that remains of this employment location and that further elements here will be transferring over to residential use, the rationale for continued inclusion as a secondary area of focus is much reduced and it will therefore be deleted from Table 9 in the Proposed Submission MWLP.</p> <p>It is not known what the permission at the Ridgeway Trading Estate comprises (scale, area) and how this affects the area’s identification within Table 9.</p>

		<p>and the Ridgeway Trading estate. Policy 16 of the adopted Core Strategy for South Bucks seeks to encourage development/redevelopment of Court Lane, Ridgeway Trading Estate, and Thorney Business Park to reduce HGV movements. Inclusion of these areas as focus areas for waste development could increase HGV movements in the area depending on the type of waste activity permitted and other MWLP controls, and thus form a conflict with the adopted development plan. Additionally, there is also a conflict between the draft MWLP and the emerging Chiltern and South Bucks joint Local Plan. Thorney Business Park has been identified as a preferred option for redevelopment as part of a wider mixed use residential and offices option in a consultation carried out Oct-Dec 2016. This potential option is crucial to delivering an Iver relief road. BCC, the Thames Valley LEP and the District Councils are currently collaborating on securing funding through the Housing Infrastructure Fund towards the provision of a relief road, and the redevelopment of Thorney Business Park is expected to form a key part of this bid. The Thorney Business Park site also provides an opportunity to deliver housing proximate to a transport hub (new Crossrail station) and the identification of parts of the preferred option for potential waste uses would likely conflict with this, and not make the most efficient use of national transport investment. The identification of these employment sites as areas of focus for waste management facilities also poses an uncertain impact on the overall supply of land for B-class uses. It is uncertain what the likely land-take associated with the provision of waste management facilities may be</p>	<p>Any proposals coming forward at these locations will need to have regard to adopted policies including those on HGV movements.</p> <p>Please see the response from the owner/developer Thorney Lane LPP that states they see no conflict for now with their aspirations: "We do not see that there is any reason to object to the Preferred Options Consultation because it does not appear to restrict redevelopment of the site. It merely identifies the site as a potential location for waste management facilities on the basis that it is an existing employment site." Until there are firm proposals here- in the form of a permission in principle or an allocation in an adopted plan- the MWLP will assume continuation of a general industrial use.</p> <p>Table 8 of the Draft Plan gives the broad indicative number of waste facilities required to meet the capacity gap identified in the Plan. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably one at most) coming forward at</p>
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		<p>while the HEDNA identifies the need for increasing land for B-class uses. To meet this need, our Councils are having to consider Green Belt releases, therefore the consequential impacts on the availability of employment/industrial land, although uncertain, could increase the risk of under-provision of B-class land if significant employment land is taken up by non B-class waste development. Pressure is already being placed on employment sites for redevelopment or conversion to housing and proposed waste management uses could place additional strain on the overall supply of employment land and sites.</p> <p>Similarly, a requirement for strategic development areas and major developments to incorporate neighbourhood waste facilities adds uncertain pressure to land-availability for housing and employment.</p> <p>Further clarification on the types of facilities required and the likely land-land take associated with these is required in order to assess the implications for meeting housing and employment needs within our Districts.</p> <p>The areas of focus for waste management should be reviewed in light of the current development plan (Core Strategy policy 16), recent changes of use to residential development at these sites, and also in light of the emerging joint Local Plan.</p> <p>At the very least, changes to policies 14 and 15 should be made to seek to ensure that any proposals for waste management facilities must demonstrate compliance with relevant development plan policies (including district local plans) and must be complementary to the current and future role, status and uses of the employment area.</p>	<p>each location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. Bearing in mind the concerns raised about loss of general employment land that where the opportunity could be taken to refuse a large planning application for residential development in an employment area could have been taken (Asheridge Road) this did not occur.</p> <p>Estimated facility needs and landtake per facility is identified in table 8, more detail is not possible for the reasons stated in the preceding paragraphs.</p> <p>As proposals need to comply with adopted policies- regardless of what plan they are in- then there is no need to specifically reference this in policy.</p> <p>Noted, although it does appear that both councils are</p>
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Wycombe District Council		<p>We have concerns about the identification of several of our existing employment areas as being potential sites for waste facilities. Our concerns are as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Generally: we are in the later stages of preparing our Local Plan, and several of the areas identified are being put forward as primary employment areas, with the ambition to improve the commercial attractiveness of several of these areas especially Cressex Business Park, Sands Industrial Estate, and M40 Junction 3, Loudwater. We are concerned that waste facilities in these areas will undermine our ability to deliver on this vision. This is particularly the case at Cressex Business Park where our draft Local Plan is seeking to enhance and maximise its economic potential in the light of the Bucks HEDNA identifying the need for quantitative and qualitative improvements in employment land provision in the District. Many waste facilities are unlikely to complement such a role. We would ask you to remove Cressex Business Park and the Knaves Beech portion of M40 junction 3, Loudwater from the list of sites in particular and to consider more detailed policy criteria to ensure that any waste facility is complementary to the current economic role of an existing employment area and not undermine its economic attractiveness. <input type="checkbox"/> Over the last few months we have been seeking clarification on the potential amount of employment land that may be required for waste facilities to feed into the review of employment land supply against HEDNA forecast 	<p>This comment appears to suggest that waste management operations cannot be modern up to date facilities that would not be out of place on a business park let alone an industrial estate. It is also uncertain what is being proposed by WDC and partners to improve the commercial attractiveness of the three named locations that having a waste facility within such areas would detract from. Cressex for example is a large, general industrial estate with a wide range of uses, including existing waste management uses, and as part of increasing its “commercial attractiveness” does this mean that that certain types of employment uses will be encouraged to go elsewhere and if so where. The population of Wycombe district require a range of jobs and these include general industrial jobs such as those in waste management.</p> <p>Bearing in mind how many locations have been identified in Table 9, plus that other proposals can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably no more than one, if that) coming forward at each</p>

		<p>requirements, set out in the HEDNA addendum. We note that table 8 is not intended as an indicative landtake for new facilities, and presents an excessive level of new facilities delivery (and associated land take) which is stated to not be a true reflection of what will be delivered in the accompanying text. When you have identified the quantum of land / floorspace that is actually required, this urgently needs to be fed into the Bucks wide employment land assessment, together with some estimate as to what proportion might be classified as B2 or B8.</p> <p><input type="checkbox"/> We have some concerns about the appropriateness of some of the sites which have been identified in terms of the suitability of the local road network to support the numbers of large vehicles that these facilities would attract. We have particular concern for the site at Thomas Road, Wooburn in this respect. Can you clarify how these sites have been reviewed from a transport point of view and provide any site assessment proformas for each of the Wycombe sites, as they do not seem to have been made available as a part of the plan's supporting evidence. Could a requirement be added to policy 15, development principles, geared toward ensuring there is no increase in road traffic on the local road networks without appropriate mitigation, and with the implicit</p>	<p>identified location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. One of the market considerations will be availability of units at locations and, if that location is in demand, the cost to the prospective operator of available units. Floorspace cannot be identified as the manner in which waste management facilities are delivered on the ground is subject to too many variables such as industry investment options, commercial contracts, opportunities to co-locate/integrate facilities, operational/market needs and technology/operational advancements. The waste industry is currently a very fluid environment. Any figure identified for floorspace would be heavily caveated and would not reflect what would be delivered on the ground over the plan period. This approach is not considered to be sound as it would produce false results and would not be in line with the NPPW (S2), which states that spurious precision should be avoided. A guide to landtake for facilities has been provided for information and this is caveated.</p> <p>Transport and access was considered as per the site assessment methodology. It should be remembered that these are designations of locations, not site specific allocations. As such any site specific matters (such as number of HGV movements) are not able to be determined at this stage as this detailed assessment would be addressed through a site specific planning application. Any proposals coming forward at these locations will need to have regard to adopted policies including those on HGV movements. The site assessments are set out in the technical annex, publically available on the council's website with the method also available.</p>
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		<p>acceptance that some uses may be unacceptable in principle in traffic terms.</p> <p>□ The preferred sites all currently have a high level of occupancy, so we would also question the deliverability of waste facilities on the sites identified.</p> <p><i>Strategic development areas</i></p> <p>Policy 10, the spatial strategy for waste management, and the associated supporting paragraph 5.50 encourages the delivery of waste management facilities within strategic housing and employment development areas, and that the intention is that this should be consummate with the scale of the development proposed.</p> <p>We would appreciate more specific information on what this requires, particularly as we are proposing a major residential-led expansion at Princes Risborough and this was not previously raised in any of BCC's responses to our draft development plan documents, nor was it raised in response to our infrastructure delivery plan.</p> <p>The Wycombe Local Plan does not include any requirement within the policies we have developed for the site or town and we would need to understand what is being asked for, and have some clear justification. We are also concerned that such a facility would not be appropriate within the proposed residential expansion area, although it would be appropriate to locate this within the Princes Estate.</p>	<p>Occupancy may change over during the course of the plan period, again these are designations of locations, not site specific allocations.</p> <p>Policy 10 states "will be encouraged to incorporate neighbourhood waste management facilities (where appropriate)". The appropriateness of incorporating such development cannot be determined at this stage (due to insufficient detail), and would need to be considered on a site-by-site basis through the planning application process. Para 5.50 expands on the policy by stating that such facilities "would generally include small scale facilities that support preparing for re-use and recycling, for example bring/recyclate collection sites (where complementary to operating kerbside collection systems), or baling/'mini-MRF' facilities (where associated with commercial or industrial uses)". Where this is determined to not be appropriate the requirement of the policy may simply translate into incorporating design elements and layout that complements sustainable waste management by providing appropriate storage and segregation facilities.</p>
Milton Keynes Council		<p>In general, we are content with your proposed Mineral and Waste Plan as we do not consider the proposals will present a direct impact to Milton Keynes.</p> <p>However, we note you propose to develop a Secondary Waste Management Area, near the boundary with Milton Keynes, which is described</p>	<p>Paragraph 22 of the Briefing Note on the Waste Spatial Strategy (part of the Draft Plan consultation material) states about development at Bletchley Leys/Newton Longville:</p> <p>"This would be significant development into Buckinghamshire and would within the development area be able to provide employment</p>

		<p>in the plan as the “Milton Keynes Fringe”, as illustrated on Plan 1 (pp. 66) and Map 5 (pp. 75). Based on the above, in due course, please could you provide further information regarding the planned development within the ‘Milton Keynes Fringe’. For example, in terms of the type and scale of facilities that might be proposed, to ensure it does not have a detrimental impact on Milton Keynes and its residents and businesses.</p>	<p>opportunities including the potential for waste development. However such opportunity would not predominantly serve Buckinghamshire and should therefore not be considered a primary opportunity.”</p> <p>Prior to the finalisation of the Preferred Options MWLP the detail of this strategic development area was not known and so it was difficult to assess this in detail. However the Proposed Submission Vale of Aylesbury Local Plan (VALP) has now been issued and this gives much more detail about the disposition of uses here. There is a small amount of employment land identified adjacent to the proposed local centre. This is not really suitable for a waste facility and therefore the Milton Keynes Fringe should be removed as an area of secondary focus from Table 9 in the Proposed Submission MWLP.</p>
Historic England	Yes		Noted.
Brett Aggregates Ltd	Yes		Noted.
Thorney Lane LLP		<p>The site is allocated in the MWLP as a Secondary Area of Focus for Waste Management Use.</p> <p>We are currently in discussion with South Bucks District Council about the comprehensive redevelopment of the entire Thorney Business Park site, including some surrounding land. The site is Preferred Option 13 of the South Bucks District Council’s latest Green Belt Preferred Options Consultation.</p> <p>The allocation is being progressed for various reasons, including the potential to provide a new link road through the site that would effectively form a relief road for Iver. That proposal is supported by your Council as highway authority (and is also supported by the wider community, which has lobbied for an Iver relief road for many years).</p> <p>Whilst the proposed allocation is for mixed use development, the commercial elements of the</p>	

		<p>proposal are proposed to be predominately office type uses. This accords with proposals for Iver station to become a 'CrossRail' station, which would open up new opportunities in terms of sustainability and economic development potential. It is not considered that waste management facilities would be compatible with these uses.</p> <p>We do not see that there is any reason to object to the Preferred Options Consultation because it does not appear to restrict redevelopment of the site. It merely identifies the site as a potential location for waste management facilities on the basis that it is an existing employment site. However, for the avoidance of doubt it is highly unlikely that the site will be suitable for such uses in the longer term and we would strongly object to any planning policy that sought to safeguard the site for such uses.</p> <p>However, my clients have various interests in waste management facilities and wider landholdings in the area. If the County Council wanted to discuss alternative sites for waste management facilities then we would be very pleased to enter into discussions with you.</p>	<p>Noted.</p> <p>Identification as a secondary area of focus for waste management in Table 9 does not make a location safeguarded for waste use. For the avoidance of doubt this will be clarified in the Proposed Submission MWLP.</p> <p><u>7.93. It should be noted that safeguarding measures set out in Policy 27 do not apply to the areas of focus for waste management identified in Table 9, however where an individual site within one of these areas has extant planning permission the provisions set out though the policy are applicable to this site.</u></p>
Veolia	No		Please refer to Planning Authority Response to Veolia's response in previous section.
Cllr Patricia Birchley (BCC)		<p>This development falls into my Division and I am horrified by what is being proposed. This week Symply Petfoods in the Anglo Business Park, Asheridge Road Chesham was presented with the Queen's Award to Industry for Export Achievement. They have grown their turnover to £27 million in 8 years and export 46% of their products.</p> <p>We heard that because there is no commercial land available in Chesham they cannot expand without moving the company to Woburn</p>	<p>It should be noted that a waste management use is a job creating use industrial in nature that it is appropriate to site on a general industrial estate. The issues of a lack of such uses in the area is noted and is unfortunate that a significant element of the industrial estate has recently been granted for a non-industrial use thus further limiting locations where general industrial uses can be sited. However due to the limited area that remains of the industrial location and that further elements here will be transferring over to residential use the rationale for continued inclusion</p>

		<p>Common. This situation is suicidal for Chesham with the amount of housing planned and the site in Asheridge Road should most definitely remain commercial and not residential, or for waste disposal.</p> <p>Please take this up at the highest level. For companies wanting to expand there is no possibility in Chesham. Symply could have sold their site many times over and a neighbouring company in the Anglo business park has bought it.</p>	<p>as a secondary area of focus is much reduced and it will therefore be deleted from Table 9 in the Proposed Submission MWLP.</p>
Cllr Mark Shaw (BCC)		<p>This development falls into my Division and I am horrified by what is being proposed. This week Symply Petfoods in the Anglo Business Park, Asheridge Road Chesham was presented with the Queen's Award to Industry for Export Achievement. They have grown their turnover to £27 million in 8 years and export 46% of their products.</p> <p>We heard that because there is no commercial land available in Chesham they cannot expand without moving the company to Woburn</p> <p>Common. This situation is suicidal for Chesham with the amount of housing planned and the site in Asheridge Road should most definitely remain commercial and not residential, or for waste disposal.</p> <p>Please take this up at the highest level. For companies wanting to expand there is no possibility in Chesham. Symply could have sold their site many times over and a neighbouring company in the Anglo business park has bought it.</p>	<p>It should be noted that a waste management use is a job creating use of an industrial in nature that is appropriate to site on a general industrial estate. The issues of a lack of such uses in the area is noted and is unfortunate that a significant element of the industrial estate has recently been granted for a non-industrial use thus further limiting locations where general industrial uses can be sited. However due to the limited area that remains of the industrial location and that further elements here will be transferring over to residential use the rationale for continued inclusion as a secondary area of focus is much reduced and it will therefore be deleted from Table 9 in the Proposed Submission MWLP.</p>
Cllr Alan Bacon (Chiltern DC)	Yes	<p>The Asheridge Road, Chesham site includes a very large area which has just been granted planning consent for 142 dwellings.</p>	<p>That part of the industrial estate that now has permission for residential development can no longer form part of the employment area and the Table 9 location can therefore only relate to the remaining area. Due to the limited area that remains of the industrial location and that further elements here will</p>

		Asheridge Road is also not ideal from the point of view of transport. It is on the edge of the town but access is through the town on narrow and congested roads.	be transferring over to residential use the rationale for continued inclusion as a secondary area of focus is much reduced and it will therefore be deleted from Table 9 in the Proposed Submission MWLP. See above.
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Are there any other suitable sites for waste management facilities not already identified in the plan?

<i>Respondent</i>	<i>Comment</i>	<i>Planning authority response</i>
M Newey	<p>The plan states that there is 'sufficient capacity' planned for the EFW incinerator power plant at Great Moor but that due to 'commercial arrangements' that other proposals could come forward.</p> <p>Given that the plant produces nearly 300% more NOx than the most polluting road in the country and the growing body of evidence which shows how much more dangerous these poisons are than we first thought, can the local population (and national population) be assured that this is a last resort? Keeping in mind Britains air pollution figures are already at woefully illegal levels.</p> <p>Given the shocking new evidence of how much more harmful these pollutants are can we be sure that there are no significant risks to human health from existing plants or extending/building new ones? Are we absolutely clear that this is not likely, given that ten years ago we were of the assumption that they were nowhere near as harmful as we now know them to be, what new information may come to light in the next ten years? Britain's legal levels of these pollutants also needs to be taken into consideration and the effects of repeatedly breaking them.</p> <p>Increasing the levels in the area of Calvert, Edgcott and Steeple Claydon in particular could be very harmful</p> <p>One would assume that to achieve a true circular</p>	<p>Air emissions are regulated by the Environment Agency. Any new development/proposals would be licenced by the EA and subject to controls and monitoring in accordance with regulatory requirements.</p> <p>Waste management targets are aligned with national/EU targets</p>

	<p>economy if would be much better to recycle more of the materials rather than burn them even though burning them does produce some energy. One would hope that the focus and efforts would instead be diverted and the rather low figure of 52% of waste being recycled would increase much more in the coming years and that the focus for energy should be renewable, and so not to cause further air pollution. A very achievable alternative would be to build all new homes with solar roofs (cheaper than normal roofs) and battery storage making most of them 100% self sufficient in terms of electric and incentivise solar more for existing home owners.</p> <p>This would be putting the health of the local and wider population (including yourselves) before profit or commercial arrangements.</p> <p>Also, everyone I know had no idea that this consultation was taking place.</p> <p>Thank you for taking the time to read my comments; I do hope you will consider them.</p>	<p>as appropriate. Not all waste material can be recycled due to contamination and market demand/consumption, therefore there needs to be other management methods to deal with the waste appropriately.</p> <p>The scope of the MWLP does not include renewable energies such as solar power.</p> <p>The consultation was run along the same lines as is usual for County Council local plan consultations. The consultation material was published on the Council's website and further publicised the consultation through notifications to all parishes within the county, a press release that had been picked up by the two main newspapers in the north of the county and through a consultation exhibition for the public, all as set out in the County Council's Statement of Community Involvement.</p>
Gerrards Cross Town Council	<p>No, these are not required. BCC is not a business, it is an elected Council whose sole reason for existence is to look after the interests of its residents.</p>	<p>It should be noted that BCC is a minerals and waste planning authority and a key role of the minerals and waste planning authority is to manage minerals and waste development in the area to meet demands for these facilities and not to have blanket bans on such developments.</p> <p>It is in the interest of the wider population of the county to ensure that waste is managed and disposed of in an appropriate manner that supports sustainable development and without endangering human health and without harming the environment (NPPW S1).</p>
Iver Parish Council	<p>The principle are acceptable. However, the identification of potential sites must be sensitive to other needs and policies of the location. For example, the sites identified within the Iver Parish neglect the absolute need to reduce numbers of HGVs using local roads. Granting permissions to sites in these locations would have a significant,</p>	<p>Any proposals coming forward at these locations will need to have regard to adopted policies including those on HGV movements.</p>

	damaging effect on the local community, in contravention of the stated policies on sustainability.	
Veolia	<p>Wapseys Wood - It is noted that the Wapsey Wood site was considered at the previous stage of the Local Plan but was not taken forward because it was not in general conformity with the spatial strategy (policy 11) and it was located within the Green Belt. As outlined above it is considered that the current spatial strategy requires amending as it does not reflect waste management needs of the county and therefore does not identify enough areas of focus in the south of the county. In respect of the Green Belt location the submission of additional information on the current planning application at Wapsey Wood demonstrates that there are no suitable available sites outside of the Green Belt and that the proposed development at Wapsey Wood would contribute towards the development of a sustainable waste management network and the capacity requirements of the Draft Plan. In addition the previous stage of the Local Plan considered the entire Wapsey Wood Waste Management Site, which is 155ha, for inclusion in the Draft Plan and the area that is now sought for inclusion is 8.8ha, which the current planning application at Wapsey Wood has demonstrated can be developed with no adverse impacts on the environment or local communities.</p> <p>The proposed Wapsey Wood site is under the control of the waste management industry and is therefore deliverable. The current planning application will provide MRF/transfer, anaerobic digestion and inert recycling capacity all of which the Draft Plan confirms there is a need for. The current planning application has demonstrated that all these facilities can be delivered at this location with no adverse impacts on the local community or the environment and that there are no suitable sites available outside of the Green Belt.</p>	<p>Policy 14 states that new standalone waste facilities should be directed towards the primary and secondary areas of focus. However paragraph 5.87 states that in certain circumstances development outside existing urban boundaries not identified in local plans may be appropriate. The Council acknowledges that there are less areas of focus in the south of the county but the overall quantum of new development to meet indicative capacity needs across the whole county and as set out in Table 8 is not on a major scale. On this basis it is not considered that there are at the local plan level the exceptional circumstances prevailing that would necessitate the MWLP taking sites out of the Green Belt for development for waste purposes. Nevertheless the MWLP does not preclude proposals coming forward through a planning application at Green Belt locations (including the specific site at Wapseys Wood referenced by the respondent) but any such applications would need to robustly justify how the proposal is in line with MWLP and Green Belt policy.</p>

About the plan

Do you have any comments about the vision and objectives of the plan?

<i>Respondent</i>	<i>Agree with vision and objectives</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough		Attractive rural areas such as Slade Farm should be conserved. They are not urban. Restoration should not be landfill. This is not high quality restoration.	Inert fill is often required at mineral extraction sites to facilitate restoration – however it should be noted that this is not “black bag” waste but inert material (i.e. construction rubble and the like – see glossary definition of inert waste). The plan seeks to achieve high quality restoration through Policy 26, which can be achieved through inert landfilling.
Peter Brogden		Minerals sites make a minimal contribution to economic growth in Bucks. Nothing in this plan suggests the provision and use of primary minerals is becoming more effective. Restoration requirements, certainly as proposed for Slade Farm, are very far from ‘high quality’ Enhancement of the natural environment and quality of life of residents is not evidenced. On the contrary the primary consideration appears to be least cost, with no valuation applied to environment or amenity.	Mineral extraction makes a contribution to new development and therefore to growth. Minerals extracted both in Bucks and imported into Bucks support this new development. The plan meets the national requirements for identifying the provision to be met for land won minerals and then allocates sites that go towards meeting this provision. Restoration requirements will need to be in line with the policies in the Plan in particular Policy 26 (Delivering High Quality Restoration and Aftercare) and Policy 25 (Environmental Enhancement).
Zoe Davis		The plan is not acceptable. We already have enough noise pollution, we have the Bucks tip which brings nasty smells. We want our children to thrive and live here for many years, not to be told they cannot go out because of danger zones, because of lorries all day every day at all hours. We want our animals here, we want our green belt. Do not ruin this village.	The plan addresses potentially adverse impacts associated with minerals and waste development (including amenity, noise, odour and transport) and requires such impacts to be avoided and / or minimised to acceptable levels in line with national policy and guidance. These factors have also been taken into consideration through the site assessments. National policy recognises that minerals can only be worked where they are found and does not prohibit extraction from within green belt land (refer NPPF para 90 and 142).

D Harvey		Please don't use Green Belt land to achieve the plan goals	Green Belt land is addressed in Policy 22 and accords with the NPPF.
Mr and Mrs Lawani		Please refer to the email from Hedgerley Parish Council to Mr A Sierakowski dated 10 th August 2017 - Copy of email included in comments under first question in relation to minerals provision.	See comments under first question in relation to minerals provision.
M & K Orchard		Minerals sites make a minimal contribution to economic growth in Bucks. Nothing in this plan suggests the provision and use of primary minerals is becoming more effective Restoration requirements, certainly as proposed for Slade Farm, are very far from 'high quality' Enhancement of the natural environment and quality of life of residents is not evidenced. On the contrary the primary consideration appears to be least cost, with no valuation applied to environment or amenity.	Please refer to planning authority response in relation to response made by Peter Brogden as above.
Chiltern Society		The Chiltern Society would like to see a reference to preserving the openness of the Green Belt included in the Vision Statement. This would ensure that the Green Belt had a sufficiently high profile in the Plan and would help to ensure that national Green Belt policies in paragraphs 79 - 91 of the NPPF are applied throughout the Local Plan. The Society strongly supports Strategic Objective SO5, which gives protection to the Chilterns AONB and the Green Belt and commits the Council to conserving and enhancing the character and appearance of the landscape in the County. It is particularly important that landscape impacts are fully considered for the allocated mineral and waste sites that are located within the Green Belt and in the area of the Chilterns that is outside the AONB boundary.	This is not necessary – such statements are made in the NPPF and reflected in Policy 22. Noted.

Aston Clinton Parish Council		These are well thought out	Noted.
Buckland Parish Council		<p>Members wished to object on the proximity principle not being abided to (Table 9). Currently, noxious fumes are suffered on a regular basis from the Olleco plant in Buckland/Aston Clinton. Resulting in complaints to the EA, Arla and Olleco despite assurances that there would be no suffering from noxious fumes and the affect to health and quality of life of local residents.</p>	<p>The issue of proximity principle raised by the parish council is not understood in the context of this representation as the proximity principle, as set out through the NPPW and The Waste (England and Wales) Regulations 2011 (refer Schedule 1, Part 1, paragraph 4), seeks to establish an integrated network of waste management and disposal facilities that supports self sufficiency and enables waste to be disposed of and mixed municipal waste to be recovered in one of the nearest appropriate installations, by means of the most appropriate technologies, in order to ensure a high level of protection for the environment and human health. The identification of a range of locations that are related to the existing and planned communities / growth areas within the county supports the development of waste management facilities and the provision of a framework in which communities and businesses are engaged with and take more responsibility for their own waste as per national policy (refer NPPW para 1), this approach is in line with the proximity principle.</p> <p>Table 8 of the Draft Plan lists the indicative waste management facilities required to meet the capacity gap identified in the Plan. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably no more than one, if that) coming forward at this location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. Any planning applications for waste management facilities at this location will need to comply with the policies in the MWLP particularly those relating to impact on the environment, amenity and the highway network and also require an environmental</p>

			permit from the Environment Agency to operate.
Gawcott with Lenborough Parish Council		The Vision and Objectives are fine. The proposals in the plan fail to meet the stated objective “to conserve and enhance the natural environment and quality of life of the residents”. The adoption of Greatmoor as the Primary Area of Focus for the Northern Buckinghamshire Waste requirements is the only way to approach meeting the Vision.	The plans policies address the conservation and enhancement of the natural environment and quality of life of the residents through section 7 – refer policies 17 through to 29. Only urban areas are appropriate to be identified as a primary area of focus (see Briefing Paper on the Spatial Strategy for Waste which formed part of the consultation material). However Greatmoor is identified in Table 9 as a secondary area of focus for waste management.
Gerrards Cross Town Council		The title of the documents is incorrect. This is a Core Strategy and Local Plan. Further, it cannot purport to plan for 2016 in the year 2017! The title should be “Buckinghamshire Minerals and Waste Core Strategy and Local Plan 2017 – 2036”. Item 1 on page 2 states that additional development plans should only be used when this is clearly justified. It further states that there is not a strong case unless it incorporates a replacement Core Strategy. The given justification for the new Core Strategy is the completion of the Greatmoor incinerator. This justification only applies to Waste and has nothing to do with Mineral Extraction. We would therefore question the need for a RMWLP. With the reduction of landfill Waste due to the introduction of Landfill Tax, the connection between Mineral extraction and Waste is weak and these should be considered separately. It is not clear what the three policies associated with the Greatmoor EfW facility are. As these are given as the justification for the replacement plan, these should be clearly stated in the document. In the key drivers, we would question the assumption of an increase in population from	Local plans always have a plan period and these normally have a start date that has commenced before the plan has been adopted; this is because plans must have a baseline this is usually the year that preparation of the plan has commenced, or the most recent date from which data has been collated. As stated in the following paragraph “a review to encompass both the saved policies of the BMWLP and the MWCS would therefore be overall far more cost effective and minimise stakeholder consultation/engagement overload and confusion through having two documents prepared at the same time”. It is not necessary to do this. However for information the policies are CS11, CS12 and CS13. The population estimates are based on the HEDNA update Dec 2016 as referenced in para 2.12 (this is the

		<p>530,000 in 2016 to 610,000 in 2016. On page 7, it states that the county's population is planned to grow by 15% from 2016 to 2036. We would question this as far too high an estimate, particularly in the light of the reduced estimated population as a consequence of Brexit.</p> <p>It is not clear what is meant by "temporary" sites that is used throughout the document. The word "Temporary" should be clearly defined, e.g. for a maximum of 5 years. (e.g. see 4.71 on page 34)</p> <p>Sand & Gravel provision figures from 2006 to 2015 have been used as the trend for the last 10 years. This is out of date and should include figures for 2016 and 2017. The 2016 figures must be known and should be included.</p> <p>On page 25, If the existing Local Plan is out of date after 5 years, we would question the requirement for estimated sand and gravel production for the years 2016 – 2036 that is being used to justify the opening of new sites. At the current rate of consumption, which is diminishing, the existing reserves will last for over 11 years, which if more than adequate for the life of this Local Plan.</p> <p>Modern housing uses and increasing amount of man-made materials in its construction, diminishes the need for sand and gravel, particularly beyond the next 10 years. This has not been taken into account, resulting in an overprovision of sand and gravel.</p>	<p>best available information). The impact of Brexit is uncertain and adjusting forecasts based on this would be premature.</p> <p>Temporary is a use that has an end date specified in the planning permission rather than any set period.</p> <p>Due to the monitoring / industry reporting schedule (dictated at a national level) the 2016 figure was not known when the plan was drafted. The 2017 figure will not be known until the middle of next year.</p> <p>Government guidance is that plans should have an end date of at least 15 years from when they are adopted (the Plan is expected to be adopted in 2019). The reason for this is to give a long enough period to plan and bring forward major development.</p> <p>As per government guidance the provision for sand and gravel set out in the MWLP has to be made for "land won" extraction i.e. extracted from the ground. Housing is not the only form of development that consumes aggregates – a significant amount is also required to deliver supporting infrastructure and other form of development (commercial and industrial) that provide services to the community.</p>
Halton Parish Council		<p>Members wished to object on the proximity principle not being abided to (Table 9). Currently, noxious fumes are suffered on a regular basis from the Olleco plant in Buckland/Aston Clinton. Resulting in complaints to the EA, Arla and Olleco despite assurances that there would be no suffering from noxious</p>	<p>The issue of proximity principle raised by the parish council is not understood in the context of this representation as the proximity principle, as set out through the NPPW and The Waste (England and Wales) Regulations 2011 (refer Schedule 1, Part 1, paragraph 4), seeks to establish an integrated network of waste management and disposal facilities that</p>

		fumes and the affect to health and quality of life of local residents.	<p>supports self sufficiency and enables waste to be disposed of and mixed municipal waste to be recovered in one of the nearest appropriate installations, by means of the most appropriate technologies, in order to ensure a high level of protection for the environment and human health. The identification of a range of locations that are related to the existing and planned communities / growth areas within the county supports the development of waste management facilities and the provision of a framework in which communities and businesses are engaged with and take more responsibility for their own waste as per national policy (refer NPPW para 1), this approach is in line with the proximity principle.</p> <p>Table 8 of the Draft Plan lists the indicative waste management facilities required to meet the capacity gap identified in the Plan. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably no more than one, if that) coming forward at this location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. Any planning applications for waste management facilities at this location will need to comply with the policies in the MWLP particularly those relating to impact on the environment, amenity and the highway network and also require an environmental permit from the Environment Agency to operate.</p>
Iver Parish Council		The aims and policies are largely reasonable. However, I have major concerns over their implementation. For example in granting approval to CEMEX to undertake mineral extraction at the site in North Park, Richings Park, concerns expressed by the Parish Council and local residents were totally disregarded. The stated policy of transporting minerals by water-	The ability to utilise alternative methods of transport is largely determined by economic viability and other constraining factors, however this does not mean that the plan should not support these methods and require them to be taken into consideration by proposals.

		<p>ourn transport could have been implemented for this site through the use of local canal system but no attempt was made to do so. Vision and policies are fine but they are worthless if they are disregarded when granting permission.</p>	
Mentmore, Crafton and Ledburn Parish Council		<p>MPC supports SO6, the strategic objective to encourage sustainable transport movements and to ensure that development does not have unacceptable adverse impacts on the community. Such objectives have not, however, been enshrined in clear and effective policies in the waste section of the DPO. The preamble to Chapter 5 inexplicably does not even include SO6 as a relevant objective. It should be included as it is or at least should be a key objective in relation to waste proposals in the rural area.</p>	<p>SO6 is taken forward through policy in section 7 of the plan – refer policy 18.</p>
Radclive cum Chackmore Parish Council		<p>With regard to HGV traffic management for either plan, please ensure that should any of the sites close to Buckingham be selected, that a condition is made within the planning consent that prohibits HGV traffic from coming through Radclive village (MK18 4AB). Main Street, Radclive is already designated as “Unsuitable for HGV” but unfortunately this designation is not sufficient to prevent the road being subjected to frequent HGV abuse. As part of the road is single track – where the road crosses the river Gt Ouse – it is totally unsuitable to HGV traffic which has proved dangerous to residents and property in the past.</p>	<p>If any applications come forward at the Radclive Road location then it will be subject to a condition requiring access to only be from the A421 to the north and not through Gawcott.</p>
Chilterns Conservation Board		<p>Objective SO5 is not strong enough on the AONB. It should explicitly conserve and enhance the Chilterns AONB, not just refer to landscape character and treating assets in an “appropriate manner” – the plan should lead by stating how they will be treated.</p>	<p>The objective states that such assets should be protected and conserved in an appropriate manner. The relevant policies provide more detail on this matter. The objective seeks positive improvements of the natural and historic environment and landscape character – again the relevant policies provide more detail on this matter.</p>

		The final sentence of SO5 should seek a net gain for landscape and the AONB as well as biodiversity e.g. through the removal of existing detractor features, and sensitive restoration which provides for improved recreation and enjoyment.	
Historic England		Historic England welcomes the inclusion of “Buckinghamshire’s natural and historic environment and the quality of life of its residents have been conserved and enhanced for future generations” within the Vision in the Plan. We also welcome Strategic Objective SO5.	Noted.
Aggregates Industries UK Ltd		Page 14, SO6: Sustainable Transport of Minerals and Waste – The aims of the strategic objective are supported. However, by neglecting to safeguard existing, planned and potential rail heads, the MWLP consultation document fails to support those sites which already or could provide a sustainable alternative to the importation of crushed rock aggregate by road into Buckinghamshire and the export of waste by road from the County.	Refer to Policy 27 and preceding paragraphs/footnote. The plan should be read as a whole.
CEMEX		CEMEX support the vision proposed by Buckinghamshire in the draft plan – but request that the wording of the vision is amended that National Planning Policy Framework policy on minerals planning and that reference is made within it to “provision of a steady and adequate supply of minerals”. At this stage CEMEX supports the strategic objectives outlined in the draft plan. CEMEX support the approach set out in the strategic objectives and the encouragement focused on increasing the supply of recycled aggregates as a source of building material through greater aggregate recycling. CEMEX support recycled aggregate sites at existing	This is addressed through the objectives and policy at an adequate level. Noted.

		<p>sand and gravel quarries through temporary permissions. (Paragraph 4.12) CEMEX support the safeguarding of mineral resources and the prevention of minerals being sterilized by other forms of development. CEMEX note the criteria set out in paragraph 4.19 which exempt consultation relating to development in MSA's, but ask Bucks CC to reconsider this and add a caveat when the developed occurs adjacent/neighbouring an allocated mineral site/preferred mineral area or an existing permitted quarry. New development in such close proximity may prevent planning permission from being granted in the future for these or prohibit extension sites.</p>	<p>Noted.</p> <p>Development in proximity to permitted mineral extracted sites is addressed in Policy 28. Minerals within a site allocated through the plan that does not have planning permission for extraction are included within the MSA and so are safeguarded under Policy 1.</p>
Summerleaze		<p><i>Page 12, Vision for the Minerals and Waste Local Plan</i> – the Vision states that by the end of the Plan period mineral sites should be available to support economic growth and deliver social and environmental benefits. The Plan does not achieve this as there are insufficient resources identified to ensure at least a seven year landbank of sand and gravel at the end of the Plan period.</p> <p>This is a fundamental flaw and will result in a shortage of available aggregate toward the end of the Plan period. Full provision should be made at the outset of the Plan for the entire Plan period including a full landbank of at least seven years at the end of the Plan period. If this is not provided at the end of the Plan period there would be less than a seven years landbank and the Vision would not be delivered.</p> <p>Providing sufficient allocations to maintain at least a seven year sand and gravel landbank at the end of the Plan period would provide certainty that mineral resources would be available to meet demand and allow appropriate investment in site development.</p>	<p>Please refer to planning authority response in relation to response made by Summerleaze with respect to “Minerals Provision” as above.</p>

		<p><i>Strategic Objectives</i> Page 13, SO1 <i>Contributing towards Sustainable Communities and Economic Growth</i> – the first Strategic Objective states that for mineral development sufficient land should be identified to be able to maintain a steady and adequate supply of sand and gravel over the Plan period. As referred to in this submission the Plan does not allocate sufficient sand and gravel to maintain a landbank of at least seven years at the end of the Plan period, therefore this Strategic Objective cannot be achieved. The allocations also do not provide for a steady supply of aggregates during the Plan period. This is indicated in Table 1 Buckinghamshire Aggregate Output during the Plan period attached at the end of this submission which has been produced assuming the existing and proposed Buckinghamshire sites operate as anticipated. It can be seen that output would vary between over 1.3 million tonnes per year in 2018 to less than 550,000 tonnes per year for the last seven years of the Plan. This would not constitute a steady and adequate supply.</p>	<p>The majority of industry interest brought forward through the call for sites and Preferred Options consultation is for the short to medium term. Since the original call for sites some of these sites now have planning permission. With the commitments already present this has the potential, if all sites are progressed, that there could be a bulge in supply in a few years time. Whether this occurs is up to how the industry takes forward its committed sites in Buckinghamshire and also how these link to the other committed sites they have outside Buckinghamshire; it is also dependent on the performance of the UK economy and it is noted that at the end of October 2017 the construction industry is officially regarded as being in recession. This may make the spread of the aggregates provision more even over the plan period but it may not. However it would not be correct of the MWLP to attempt to add more allocations on the basis that this bulge in production were it to happen would require some form of continuation at this level (also there is no saying that even if the economy was to be buoyant through the early part of the 2020s it would remain so into the late 2020s or early 2030s). Nevertheless local plans need to be regularly reviewed. If production continues to increase in line with the commitments present then this would also have an impact on ten and three year sales figures too</p>
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		<p>Page 13, SO3 Facilitating the delivery of Sustainable Minerals Development – the third Strategic Objective requires sufficient sites to be identified to ensure delivery of a steady and adequate supply. As referred to in this submission the Plan does not allocate sufficient sand and gravel to maintain a landbank of at least seven years at the end of the Plan period, therefore this Strategic Objective cannot be achieved.</p>	<p>and this would need to be accounted for in any review/partial review. It should also be noted that the plan includes policies to allow for unallocated sites to come forward where there is a demonstrated supply/market need – with reference made to the most recent LAA and other evidence- and this would kick in were the plan not to be reviewed.</p> <p>The intent of SO3 was not to force the council to allocate sites where they may not be appropriate, this will be amended as appropriate.</p> <p>SO3 states “Identify sufficient sites to ensure facilitate the delivery of a steady and adequate supply of aggregates” it does not refer to landbank. The sites identified within the plan exceed the total plan provision.</p>
D.K Symes		<p>The Vision understandably seeks mineral and waste activities in Buckinghamshire to be efficient and sustainable, but it does not recognise the wider supply issues that will arise in the Plan period. This needs to be made clear in the first paragraph; for example by saying. <i>'... The existing and future needs and the various levels of planned growth in different parts of Buckinghamshire and the sub region are being met in ways that contribute to the efficiency of the transport and infrastructure networks.'</i></p>	<p>This intent is captured under the vision in the Draft Plan.</p>
Veolia		<p>The vision and objectives of the Plan are supported, in particular: SO1 which seeks to deliver a countywide network of facilities to maximise recycling and recovery; SO4 which seeks to support the co-location of facilities, minimise waste movements and make best use of a limited number of site opportunities and SO10 which safeguards existing waste sites.. However the current spatial strategy does not identify enough areas of focus for future waste development in the south of the county and will</p>	<p>Noted.</p> <p>Please refer to Planning Authority Response to Veolia responses as above in previous sections.</p>

		<p>not therefore deliver the vision and objectives of the Plan. Therefore policies 11 and 14 require amendment as set out in the attached letter.</p> <p>The Draft Plan identifies the three key strategic objectives for achieving sustainable waste development as SO1, SO4 and SO10. As noted above all three of these are supported and it is considered that the proposed Wapsey Wood site complies with them as follows:</p> <p>SO1 – it will provide a much needed recovery and biological processing facility in the south of the county as the currently permitted facilities of this nature are all in the north of the county. It will therefore help to deliver a countywide network.</p> <p>SO4 – the current planning application for the Wapsey Wood site provides capacity for inert recycling, materials recycling and transfer and anaerobic digestion all of which the Draft Plan confirms at policy 12 there is a clear need for from now through to 2021. This supports the objective of co-location and minimises waste movements by focussing activities at one location and providing much needed capacity in the south of the county.</p> <p>SO10 – allocation of the site would safeguard the existing inert recycling facility which is a valuable, well used existing facility which will otherwise be lost.</p>	
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Are there any aspects of section 7 of the plan that you particularly support or disagree with?

<i>Respondent</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	The area of South Bucks has had enough destruction through service stations and expanding motorways. This plan destroys the breathing space around our urban area even more. Where does this stop?	The proposals in the plan for South Bucks are either temporary development (sand and gravel extraction) or development on existing employment areas. However Section 7 of the plan includes policies to control and manage development in line with national policy and guidance.
Peter Brogden	The objectives expressed in this section are good and supportable. However they are not being sufficiently enforced as requirements on proposed developments.	Noted. As this plan is not yet adopted no planning permissions have been assessed or granted under its policies.
Zoe Davis	I disagree with the whole plan	The plan has been prepared in line with national policy (including the NPPF and NPPW) and associated guidance and gives consideration to local circumstance. Although the MWCS was only adopted in late 2012, by late 2017 it will be five years old and thus potentially starts to be considered by central government as being out of date. In the absence of an up to date plan assessment of planning applications would be undertaken against prevailing national policy which, owing that it is of higher level nature, does not give take into account local circumstances and considerations. This would mean that any sites in any location throughout the county could come forward through the planning application process and would be determined against any remaining (adopted) policies considered up to date or the NPPF. This approach is not preferred as it does not provide for guidance for industry investment and would result in reduced surety and confidence for the community in relation to where development is to take place as well as the form, nature and quantum of development and how local factors are to be considered through the assessment process.

M & K Orchard	The objectives expressed in this section are good and supportable. However they are not being sufficiently enforced as requirements on proposed developments.	Please refer to planning authority response in relation to response made by Peter Brogden as above.
Chiltern Society	<p>Policy 21 – Landscape Character – The Chiltern Society supports the landscape character approach to assessing the impact of minerals and waste proposals. However, the policy does not adequately address visual impacts, which are different to landscape character. A Landscape and Visual Impact Assessment (LVIA) should be required for all development that includes a full assessment of views to and from the site and potential impacts, particularly where they are within sensitive areas or their settings.</p> <p>Policy 22 – Green Belt – The Chiltern Society supports this policy, particularly in relation to preserving the openness of the Green Belt. In situations where very special circumstances apply and operational buildings are essential in the Green Belt, provision should be made for their removal on completion of the operational phase. An additional clause could be added to the policy to this effect.</p> <p>Policy 23 – Chilterns Area of Outstanding Natural Beauty – The Chiltern Society support this policy. However, as currently worded it does not address the importance of the setting of the AONB. It does refer to proposals adjoining the AONB, but there may be landscape and visual impacts to be considered for sites not immediately adjacent to the AONB boundary, but affecting views to and from the AONB and the wider character of the Chilterns landscape. Recognition of the importance of the settings of AONBs is a widely accepted concept which should be added in here.</p> <p>Policy 24 – Design and Climate Change – As above, this policy could also recognise the importance of the setting of the AONB and visual impacts on views to and from the AONB.</p> <p>Policy 25 – Environmental Enhancement – The Chiltern Society supports this policy. Again, the setting of the AONB could be added to the policy.</p> <p>Policy 26 – Delivering High Quality Restoration and Aftercare – This policy could be amended to include a requirement for the removal of operational buildings in the Green Belt to maintain its openness on completion of the operational phase of a development.</p>	<p>Visual impact is addressed in policy 17.</p> <p>Removal of operational buildings regarding mineral extraction forms a standard requirement/process with respect to site restoration. Similarly waste sites with temporary permission would be subject to such requirements.</p> <p>As per the Planning Authority response to the Chilterns Conservation Board, in order to provide consistency the term “setting” will be applied e.g. “within the Chilterns AONB and its setting / affecting the AONB and its setting”.</p> <p>There is no need to reiterate either national policy or the AONB management plan through the MWLP. The MWLP is to be read as a whole as such the AONB is addressed through Policy 23 and as appropriate elsewhere through the MWLP.</p>

Gawcott with Lenborough Parish Council	It is clear that BCC's criteria for "conserving and enhancing the natural environment and quality of life of residents" cannot be met by the proposals as presently set out in the plan. Parish Councillors are of the view that for Northern Buckinghamshire waste management collection, sorting and processing should be centred at Greatmoor a planned and accessible facility. Further despoiling of the north Buckinghamshire countryside with waste facilities in addition to Greatmoor is considered inappropriate and unnecessary. BCC would be expected to ensure that access to Greatmoor from Buckingham would be via "A" class roads and not through rural roads as set out by BCC in the initial criteria for the development of Greatmoor.	It should be noted that planning authorities have to prepare local plans that provide for new development and therefore that a "no development" plan would not do this. Greatmoor is a facility to deal with municipal waste which is only 13% of waste generated within Buckinghamshire (e.g. commercial and industrial waste is also generated) and thus further facilities to deal with other types of waste are still required within northern Buckinghamshire. Table 8 gives the indicative figure of what is required and Table 9 sets out the preferred areas of focus. All proposals will need to be accompanied by a Transport Assessment that will include matters such as HGV routeing.
Gerrards Cross Town Council	S04 supports the proximity principle for waste development. This is against BCC's justification for the Greatmoor EfW facility that was specifically designed to dispose of all domestic waste in Buckinghamshire for the next 30 years.	It is not understood how these two conflict as the EfW accepts municipal waste from the county and provides recovery capacity to meet the required targets.
Hedgerley Parish Council	<p>HPC objects to Policy 20 and Policy 22</p> <p>Policy 20: Historic Environment states that: "Proposals for minerals and waste development must conserve heritage assets in a manner appropriate to their significance and enhance the historic environment (where possible). This will be achieved by identifying: the nature, extent and significance of the asset(s) and their setting; potential adverse impacts that are likely to arise, specifically identifying where substantial harm or loss of significance is likely to occur, as result of the proposed development; measures required to avoid and/or minimise potentially adverse impacts to an acceptable level; the requirement for a programme of post-permission works including any mitigation measures and longterm monitoring; and opportunities for the enhancement of the historic environment (where possible)."</p> <p><i>Representations</i></p> <p>Policy 20: Historic Environment does not accord with the National Planning Policy Framework (NPPF) (paragraphs 132, 133, and 134) in that it does not spell out the different positions to be taken in responses to cases of "substantial harm or loss" and "less than substantial harm".</p> <p><i>Actions required</i></p> <p>Reword Policy 20: Historic Environment to properly accord with</p>	<p>This is not a requirement; there is no need to reiterate national policy or guidance. Policy 20 is in line with the NPPF.</p>

	<p>NPPF paragraphs 132, 133, and 134. Policy 22: Green Belt states that: “The openness and characteristics of the Green Belt are to be protected, with minerals and waste development enhancing the beneficial use of the Green Belt (where possible) through: increased access; provision of recreational opportunities; retention and enhancement of landscapes, visual amenity and biodiversity; or improving damaged and derelict land. Mineral extraction within the Green Belt will be supported where compliant with relevant MWLP policies. Development of waste management facilities in the Green Belt will be supported where it can be demonstrated that the development would not form inappropriate development and provided that it preserves the openness of, and does not conflict with the purposes of including land in, the Green Belt. Circumstances where waste development may be regarded as not inappropriate include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> waste development with a low visual impact (such as open windrow composting), <input type="checkbox"/> restoration of a mineral extraction site involving disposal of inert waste, <input type="checkbox"/> extension or alteration of an existing waste management facility provided that it does not result in disproportionate additions over and above the size of the original building, or the replacement of an existing waste management facility, provided the new building is for waste management use and not materially larger than the one it replaces, <input type="checkbox"/> limited infilling with inert waste or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, or <input type="checkbox"/> the re-use of buildings provided that the buildings are of permanent and substantial construction. <p>The following considerations may contribute to very special circumstances that would necessitate the siting of waste management facilities within the Green Belt:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the redevelopment of a waste site (e.g. landfill) to improve and enhance Green Belt objectives, or <input type="checkbox"/> whether there are any other reasonably available alternatives 	<p>Minerals can only be worked where they occur, the NPPF reflects this as it acknowledges mineral extraction is not inappropriate within green belt land. For clarity policy 22 will be amended to read “Mineral extraction within the Green Belt will be supported <u>provided that it preserves the openness of, and does not conflict with the purposes of including land in, the Green Belt and where compliant with relevant MWLP policies</u>”.</p> <p>Policy 22 reflects the NPPF and identifies circumstance where waste development may be found to be not inappropriate. For clarity amend: - 3rd para, 2nd bullet point “ <u>deposit of inert waste to land where necessary to facilitate restoration of a mineral extraction site with extant planning permission involving disposal of inert waste or engineering works</u>” - 3rd para, 4th bullet point “<u>limited infilling with inert waste or the partial</u>”</p> <p>Beyond making the link between how the provisions of the NPPG relate to minerals and waste development and the local considerations that will be used to determine applications, there is no need to reiterate national policy.</p>
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	<p>outside the Green Belt, including an assessment of options and consideration of the contribution towards development of a sustainable waste management network and capacity requirements.”</p> <p><i>Representations</i></p> <p>Policy 22: Green Belt does not accord with the National Planning Policy Framework (NPPF) (paragraphs 87, 88 and 90) and the National Waste Planning Policy (NWPP), since it misrepresents the policies in both documents. In particular it fails to confirm that:</p> <ul style="list-style-type: none"> <input type="checkbox"/> mineral extraction is inappropriate and therefore harmful to the Green Belt – meaning that, unless i) it preserves its openness and does not conflict with the purposes of including land in the Green Belt (as set out in paragraph 80) or ii) very special circumstances can be demonstrated, it should not be approved; <input type="checkbox"/> ancillary mineral development (i.e. developments which are related but not essential to the carrying out of mineral extraction) are inappropriate and therefore harmful to the Green Belt – meaning that unless very special circumstances can be demonstrated, they should not be approved; and <input type="checkbox"/> all forms of waste management (including inert landfill as a means of restoring a mineral extraction site) are inappropriate and therefore harmful to the Green Belt – meaning that unless very special circumstances can be demonstrated, they should not be approved. <p>It also fails to recognise the significance of the words “and any other harm” in NPPF paragraph 88.</p> <p>Recent planning case law (see Redhill Aerodrome Limited v Secretary of State for Communities and Local Government, Tandridge District Council, Reigate and Banstead Borough Council [2014]) has established that the inclusion of this wording extends the concept of ‘harm’ in the Green Belt to include all adverse planning and environmental effects – not just those which relate to appropriateness.</p> <p>The preceding sections 7.49, 7.50 and 7.52 are also flawed. Section 7.49 states that “Mineral extraction need not conflict with the purposes of including land in Green Belts, provided that high environmental standards are maintained and that high quality restoration takes place. Taking into account its temporary nature and the acceptance that minerals can only be worked where they</p>	<p>Para 7.49 amend as above for clarity - end of second sentence, add “does not form inappropriate development provided that it preserves the openness of, and does not conflict with the purposes of including land in, the Green Belt.”</p>
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	<p>are found, national policy recognises that mineral extraction does not form inappropriate development in the Green Belt.”</p> <p>This is a distortion of what is actually said at NPPF paragraphs 87, 88 and 90. Section 7.50 states that “Although the disposal of inert waste will play a part in the restoration of minerals working, the development of permanent waste facilities is not generally supported in the Green Belt. Where waste development is able to preserve the openness of the Green Belt and does not conflict with the purposes of including land in Green Belt, it may be regarded as not inappropriate within the Green Belt.”</p> <p>Again, this is a distortion of what is actually said at NPPF paragraphs 87, 88 and 90 and in terms of what the Secretary of State for Communities and Local Government said when announcing the publication of the NPPW on 15th October 2014 (cited elsewhere) – both of which make it clear that all forms of waste management are inappropriate in the Green Belt. Section 7.52 states that “Notwithstanding the above, proposals within the Green Belt must demonstrate that the development is designed in such a manner as to minimise potential harm to the openness of the Green Belt by reason of its design and scale, nature and location, including appropriate mitigation measures to minimise potentially adverse effects. In addition, minerals and waste development either within or conspicuous from the Green Belt should not result in visual impacts or intrusion (e.g. by reason of siting, materials or design) that would detract from the openness or character of the Green Belt.”</p> <p>This statement is equally flawed since it fails to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> require demonstration of the steps taken to ‘preserve’ the openness of the Green Belt (see NPPF paragraph 90) – rather than simply ‘minimise potential harm’ <input type="checkbox"/> require demonstration of the steps taken to eliminate conflict with the purposes of including land in Green Belt (see NPPF paragraph 90); <input type="checkbox"/> treat minerals and waste management developments equally – whereas the latter is inappropriate and therefore, by definition, harmful to the Green Belt; and <input type="checkbox"/> demonstrate a proper understanding of the differences between effects on the openness of the Green Belt and harm by virtue of adverse visual impact. 	<p>The SoS statement announcing the NPPW (https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land) and (https://www.gov.uk/government/news/new-rules-further-strengthen-green-belt-protections), as relevant to the response, seems to refer to provision set out through NPPW S6 which states “6. Green Belts have special protection in respect to development. In preparing Local Plans, waste planning authorities, including by working collaboratively with other planning authorities, should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. Local planning authorities should recognise the particular locational needs of some types of waste management facilities when preparing their Local Plan.”</p> <p>The announcement also places priority for development on brownfield land rather than green belt land – the MWLP reflects this intent. Neither the NPPF or NPPW prohibit waste development within green belt land, however they do place strict requirements on such development. Para 7.52 amend to read “as to minimize potential harm to <u>preserve</u> the openness of the Green Belt” and add “avoid and/or” between “mitigation measures to” and “minimize”.</p>
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	<p><i>Required actions</i></p> <p>Policy 22: Green Belt should be reworded as follows: <i>“Mineral extraction will only be approved in the Green Belt where it can be demonstrated that i) the openness of the Green Belt will be preserved and ii) there would be no conflict with the purposes of including the land within the Green Belt. Where either one or both of these tests are not met the mineral extraction will fall to be considered as inappropriate development in the Green Belt – meaning that planning permission will only be granted where the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (‘very special circumstances’). Ancillary mineral and waste management developments and will only be approved in the Green Belt where the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (‘very special circumstances’).”</i></p>	
Iver Parish Council	The principles are fine. The test of their success will be in the implementation.	Noted.
Chilterns Conservation Board	<p>Policy 23: Chilterns Conservation Board disagrees with just identifying the special qualities of the Chilterns AONB as features for protection. The whole AONB should be accorded equal policy weight, regardless of presence of absence of special qualities on an individual site. The correct wording from national policy is ‘conserve and enhance’, not ‘protect’. The policy fails to address major development in the AONB, which NPPF para 116 explains should be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest. CCB objects to permitting waste proposals within or adjoin the AONB where criteria are met – the presumption should be no major development in the AONB. Please reword using the AONB model policy: Policy x The Chilterns Area of Outstanding Natural Beauty Permission for major developments in the Chilterns Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it:</p> <p style="padding-left: 40px;">a. conserves and enhances the Chilterns AONB’s special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of</p>	<p>There is no need to reiterate national policy through the MWLP. The policy as set out in the Draft Plan makes reference to the need for proposals to comply with the prevailing AONB management plan (this reference was fashioned in this manner to avoid dating the plans policies in the case where the AONB management plan and its policies are updated/revised). Paragraphs 7.54 to 7.60 provide a summary of the status, condition and factors affecting the AONB and relevant sections of the management plan. The information set out is not intended to replace/reiterate the management plan, but show how the plan reflects the management plan. Regarding waste para 7.60 specifically states waste management would be of a small scale. Policy 23 addresses the AONB, and specifically addresses major development of relevance (i.e. mineral extraction and waste development) and complies with national policy. In order to provide clarity the policy is to be amended to read: “The special</p>

	<p>the AONB designation;</p> <p>b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment;</p> <p>c. meets the aims of the statutory Chilterns AONB Management Plan, making practical and financial contributions towards management plan delivery as appropriate;</p> <p>d. complies with the Chilterns Building Design Guide and technical notes by being of high quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character; and avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</p> <p>Para 7.54 and 7.5 could be improved by replacing this text with the model AONB policy supporting text agreed at the Chilterns AONB Planning Forum in 2016:</p> <p>1. Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England and Wales are conserved and enhanced. In policy terms they have the same planning status as National Parks¹. The Chilterns AONB was designated in 1965 and extended in 1990. The Countryside and Rights of Way Act 2000 places a statutory duty on local authorities to have regard to the purpose of conserving and enhancing the natural beauty of AONBs when coming to decisions or carrying out their activities relating to, or affecting, land within these areas².</p> <p>2. The Chilterns AONB covers 13 local authorities and the Councils work together to safeguard the future of this shared nationally protected area through the Chilterns Conservation Board. The Board prepares a statutory AONB Management Plan which may be / has been endorsed as a material consideration in planning decisions³. (delete as appropriate)</p> <p>3. The AONB is a nationally designated landscape and as such permission for major developments will be refused unless exceptional circumstances prevail as defined by national planning policy⁴. National guidance explains that whether a proposal constitutes major development is a matter for the relevant decision taker, taking into account the proposal in question and the local</p>	<p>qualities of Chilterns Area of Outstanding Natural Beauty (AONB) for which it was designated are to be protected <u>conserved and enhanced</u>. Proposals for minerals and waste development should seek to enhance the special qualities of <u>the Chilterns AONB</u>, and comply with the prevailing AONB Management Plan and other relevant guidance, <u>and demonstrate exceptional circumstances and that the development is in the public interest.</u>”</p> <p>The special qualities of the AONB form the basis for its designation – i.e. the factors for which it is considered important. In terms of determining potential adverse impacts on the AONB there needs to be some tangible/set matters to take into consideration. National policy does not prohibit minerals and waste development within the AONB but does set strict requirements on such development. The MWLP policy does not override the requirements set out in national policy.</p> <p>In order to provide consistency the term “setting” will be applied e.g. “within the Chilterns AONB and its setting / affecting the AONB and its setting” with related sections of the plan amended as appropriate.</p>
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	<p>context5. For the purposes of this plan, 'major development' will not be restricted to the definition of major development in the Town and County Planning (Development Management Procedure)(England) Order 2015 or to proposals that raise issues of national significance, and will include consideration of whether a proposal has the potential to have a serious adverse impact on the AONB.</p> <p>4. Add locally specific paragraph on AONB extent and special qualities and characteristics within Bucks.</p> <p>5. In determining compliance with criterion a, actions to conserve and enhance the AONB shall be informed by landscape assessment, having considered any relevant landscape character assessments and landscape and visual impact assessments and shall focus upon:</p> <ul style="list-style-type: none"> i. the Chilterns AONB's special qualities which include the steep chalk escarpment with areas of flower-rich downland, broadleaved woodlands (especially beech), commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures; ii. the scope for enhancing and restoring those parts of the landscape which are previously developed, degraded or subject to existing intrusive developments, utilities or infrastructure; iii. locally distinctive patterns and species composition of natural features such as chalk downland, trees, hedgerows, woodland, field boundaries, rivers and chalk streams; iv. the locally distinctive character of settlements and their landscape settings, including the transition between man-made and natural landscapes at the edge of settlements; v. visually sensitive skylines, geological and topographical features; vi. landscapes of cultural, historic and heritage value; i vii. important views and visual amenity, including key views from the steep north-west facing chalk escarpment overlooking the low clay vale, and foreground views back to the AONB; and ii viii. Tranquillity, dark skies and remoteness and the need to avoid intrusion from light pollution, noise, and motion. iii 6. Development proposals which lie outside the AONB but within its setting can also have impacts on it. The Council's duty of regard applies to development outside but which would affect land in an AONB6. For example, views out of the AONB from key visitor 	
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	<p>viewpoints into surrounding areas can be very significant. Although it does not have a defined geographical boundary, the setting of the Chilterns AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns AONB. Advice on development in the setting of the AONB is contained within guidance produced by the Chilterns Conservation Board⁷.</p> <p>1 NPPF paragraph 115 “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”</p> <p>2 Countryside and Rights of Way Act 2000 Section 85</p> <p>3 See the Government’s Planning Practice Guidance 8-004-20140306 Paragraph 004 (PLUS add date of endorsement for LPAs which have taken through Cabinets)</p> <p>4 NPPF paragraph 116 “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> – the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; – the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and – any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.” <p>5 Planning Practice Guidance 8-004-20140306 Paragraph 005</p> <p>6 Countryside and Rights of Way Act 2000 Section 85 :</p> <p>7 Position Statement on Development affecting the setting of the Chilterns AONB</p>	
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Historic England	Historic England welcomes and supports paragraphs 7.38 – 7.42 and Policy 20 on the historic environment. We particularly welcome the reference to the need for a deposit model for proposed sand and gravel extraction sites, to identify the nature of the deposits that would be impacted and their archaeological significance.	Noted.
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Do you have any further comments on the plan?

<i>Respondent</i>	<i>Comment</i>	<i>Planning authority response</i>
P Ascough	Slade Farm is in an area of green belt. Please save this area.	The NPPF S9 allows for development within Green Belt areas – the plan and its policies have been prepared in accordance with the NPPF. Mineral extraction is identified as not inappropriate under para 90 of the NPPF.
Mr D Fettes	I find the design of this consultation to be unfair and not fit for purpose with regard to really “consulting” the residents who find themselves living near a newly-“preferred-mineral site”, with both the holding of the “Consultation Roadshow Events” when many of the residents were taking their summer holidays, and both the web consultation form and the offline consultation form taking an overly technical and non-accessible format for the general reader.	The County Council had an extended consultation period of eight weeks as it included the August holiday period. Minerals and waste development is by its nature a technical matter. If the evidence were prepared in a more general fashion it is likely that responses would state that key facts and figures were not presented or hidden.
D Harvey	Please do not allow the development at Slade Farm	Minerals are essential to support sustainable economic growth and our quality of life and can only be worked where they are found. The appropriateness of sites taken forward through the plan have been assessed as per the site assessment methodology and are set out in the technical annex.
Mr and Mrs Lawani	Hedgerley Lane is currently treated as a waste disposal area by those who buy fast-food from the Services Area, discarding their packaging onto the roadside and thereby contaminating the local environment. If a batching plant was established along the same road, spilling concrete and admixtures along the road, the whole environment will degenerate even further.	Concrete batching plants are general industrial development (not minerals or waste development) and so are not covered by the MWLP.
M & K Orchard	There needs to be better consideration given to the boundary between gravel extraction sites and private property. Our property will be directly affected by the proposed Slade Farm South and this is shown to run up to our property boundary and within 150 metres of our house. This is unacceptable and too close and will spoil our enjoyment of our amenity. The gravel extraction at Slade Farm could last up to 30 years which is not a short term inconvenience. We have no issues with Slade Farm North (except that a concrete batching plant is not allowed under National Planning Framework in the Green Belt), but the Southern extension is too	The site assessment criteria address such matters. In addition the plan includes policies that seek to avoid and/or minimise potentially adverse impacts to acceptable levels (Section 7).

	close to the village and our property.	
C Prideaux	<p>Para 5.93 This is highly questionable at this time.</p> <p>Para 7.26 The natural environment shows very clearly that the SSSI's near Calvert are unacceptably impacted and by NO2 in particular. That there is extensive Bechstein Bat disruption. There can be no question of any further development of waste facilities at Calvert/Greatmoor until the NO2 debate is resolved</p>	<p>It is not understood what is highly questionable as this paragraph sets out under what circumstance surplus capacity might be considered acceptable. This appears to be a matter for site-specific assessment of proposed development through the planning application process.</p>
Buckingham Canal Society	<p>Policy 26 should be extended to ensure that landscape heritage features such as canals and nature reserves are protected during extraction operations and augmented during reinstatement. This should be through formal planning conditions placed upon both extraction operators and landowners to enter into formal partnerships with local community groups to ensure the protection and ultimate enhancement</p> <ul style="list-style-type: none"> <input type="checkbox"/> Sites located within river corridors should address flood management and support River Basin Management Plan actions. Opportunities to augment existing up stream and downstream fluvial peaks should leverage the use of extraction pits as balancing lakes and similar flood management tools in conjunction with opportunities such as fisheries and leisure growth. <input type="checkbox"/> Sites located within or adjacent to the Chilterns Area of Outstanding Natural Beauty, Colne Valley Regional Park or the Green Belt should seek to enhance the characteristics and qualities for which the area was designated giving consideration to the provision of green infrastructure and opportunities for access and recreation. Planning conditions such as public access to these features where not currently existing should be augmented to reinstatement agreements through planning conditions and consultation with community groups. <p>In addition to the above I would comment that previous support for community projects such as the Canal Restoration has been built into the Buckingham Neighbourhood Plan. These are also drafted in the Local Plan which is work in progress for AVDC. Such principles as formed with the BCC Green Infrastructure Strategy and associated district council policy documents are critical and must be fully reflected at county level in</p>	<p>Where canals and nature reserves are formally acknowledged through local landscape character and biodiversity strategies/plans (such as the BAP) the plans policies will take these into consideration.</p> <p>Flood risk is addressed through the site assessment criteria. The SFRA non-technical summary acknowledged that opportunities exist for restoration of mineral extraction sites to contribute towards flood management and river basin management plans. The appropriateness of which would be determined on a site-by-site basis as part of the planning application process (i.e. detailed restoration scheme).</p> <p>The plans policies, as set out in the draft plan, capture these matters. The appropriateness of public access and recreational opportunities would be determined on a site-by-site basis as part of the planning application process. The council agrees that there is an opportunity to promote beneficial outcomes with respect to the canal restoration, as such Policy 26 will be amended to include reference to the Buckingham Canal restoration as appropriate (e.g. to sites within the Great Ouse valley). Add bullet to the third para - <u>Sites located within the Great Ouse Valley should support the Buckingham Canal restoration.</u></p>

	this future M&W policy	
Chiltern Society	<p>Allocated sites – The following sites are located within the Chiltern Society area, which is based on the boundary of the Chiltern Hills Natural Area, and the Green Belt. The Plan should make clear which of the sites are located within the AONB, the wider Chilterns area and the Green Belt. Our understanding is that only the High Heavens site is located within the Chilterns AONB.</p> <p>Minerals –</p> <ul style="list-style-type: none"> <input type="checkbox"/> Springfield Farm (Beaconsfield) South Extension – Chilterns and Green Belt <input type="checkbox"/> New Denham Quarry (Denham) North Extension – Chilterns and Green Belt <input type="checkbox"/> New Denham Quarry (Denham) North West Extension – Chilterns and Green Belt <input type="checkbox"/> New Denham Quarry (Denham), Extension – Chilterns and Green Belt <input type="checkbox"/> North Park, Richings Park (Iver) – Chilterns and Green Belt <input type="checkbox"/> Slade Farm North and South (Hedgerley) – Chilterns and Green Belt <p>Waste – Primary -</p> <ul style="list-style-type: none"> <input type="checkbox"/> Cressex Employment Area – Chilterns <input type="checkbox"/> M40 Junction 3, Loudwater – Chilterns <input type="checkbox"/> Sands Industrial Estate – Chilterns <input type="checkbox"/> High Heavens (Great Marlow) – Chilterns AONB, Chilterns and Green Belt <p>Waste – Secondary -</p> <ul style="list-style-type: none"> <input type="checkbox"/> Asheridge Road (Chesham) – Chilterns <input type="checkbox"/> South of Raans Road (Amersham) – Chilterns <input type="checkbox"/> Thomas Road (Wooburn) - Chilterns <p>As these areas are very sensitive great care will be required with the design and restoration of these proposals to ensure that they do not cause long term harm to the character and appearance of their location. In particular, all applications should be required to submit a Landscape and Visual Impact Assessment (LVIA) and a full restoration scheme, including environmental enhancements. Any buildings that are required during operations should be sensitively designed and should be removed on completion of the operational phase of the site. The removal of buildings is essential to maintain the openness of the Green Belt.</p> <p>These comments are an organisational response on behalf of the Chiltern</p>	<p>The detailed site assessments accompanying the Draft Plan largely (but not in all cases) identified whether sites were within Green Belt or the AONB. Where this did not happen this will be corrected.</p> <p>The plans policies address landscape, Green Belt, AONB, design, enhancement and restoration (Policies 21 to 26).</p>

	<p>Society. The Society has over 7,000 members, seeking to protect the special qualities of the Chilterns. Our geographical area of interest is the Chiltern Natural Area - a 650 square mile area across parts of four English counties: Oxfordshire, Buckinghamshire, Hertfordshire, and Bedfordshire – both the countryside and the settlements within it. Almost exactly half of this area forms the Chilterns Area of Outstanding Natural Beauty. It also contains extensive areas of Green Belt, some of which is coincident with the AONB, but much of it is not.</p>	
<p>The Canal and River Trust</p>	<p>The Canal & River Trust own and maintain the Grand Union Canal main line, and the Aylesbury Arm of it as well as the Slough Arm in the south of the county.</p> <p>Any sites adjacent to the canal which are being considered for allocation, should consider the extent to which safeguards will be necessary to protect the canal from adverse impacts, whether the risk of direct physical impacts arising from the creation of land instability or impacts on the local water environment or impacts on the wider character, appearance and setting of the canal and any associated listed structures. Similarly, the restoration of these sites in the future should properly consider the proximity of the canal.</p> <p>Consideration should be given to whether or not there is a need for stand-off distances from the canal and the impact of operations on users of the canal should be carefully considered and mitigation measures identified where necessary in order to protect their value as leisure and recreational resources as well as important wildlife habitats both during the operational phase and after restoration.</p> <p>We note that various sections of the document identify employment land near Aston Clinton as suitable for waste management related development and recognise the reasoning behind the desire to co-located such development. We wish to advise however that the Aylesbury Arm of the Grand Union Canal is adjacent to the identified area at College Road North and that the canal should be considered as a sensitive receptor when considering further waste management development in this area. Not only is the canal recognised as an important wildlife and ecological corridor but it is and important non-designated heritage asset, a sustainable transport routes and part of one of the County's flagship Green infrastructure projects, the Grand Union Triangle.</p> <p>Several sites are identified at Iver, adjacent to the Slough Arm. Every attempt should be made to take the opportunity to improve and upgrade</p>	<p>Such considerations are reserved for the planning application process and are determined on a site-by-site basis, with regard to EA requirements.</p> <p>Policy 17 – structural integrity of canals would be captured under slope/land stability.</p> <p>Policy 19 - natural assets and resources of relevance to proposed developments will be identified and assessed under this policy including those associated with the canals. The policy provides adequate scope to capture such matters.</p>

	<p>this asset if development alongside it is deemed acceptable and in accordance with the policies (including suggestions made below).</p> <p>Policy 8 Rail Aggregate Depots and Wharf Facilities</p> <p>We note the reference to the potential for transporting material, particularly minerals and gravel by water and that this policy promotes wharf facilities. The Canal & River Trust promote the use of our waterways to carry freight but we recognise that this may not always be economically viable. The Grand union canal may be suitable for this use and any proposals for new wharf facilities should be discussed with the Trust from the outset to ensure that they will not have an adverse impact on navigational safety or the enjoyment of waterspace and towpath by other users.</p> <p>Policy 17</p> <p>We support Policy 17 which states that all proposals for minerals and waste development must demonstrate that the proposed development is environmentally feasible, secures a good standard of amenity and would not give rise to unacceptable adverse impacts. We ask however that the structural integrity of the canal is also considered for any sites for mineral extraction or waste also considers the structural integrity of the canal.</p> <p>Policy 19</p> <p>Paragraph 7.34 states that it is important to recognise the role that some landscape features play in nature conservation through providing ecological links at a landscape scale, by forming a linear and continuous structure or as stepping-stones that complement designated sites and support wild flora and fauna with regards to migration, dispersal and genetic exchange. The enhancement and ongoing management of such features is supported in line with planning for biodiversity at a landscape scale. The Colne Valley Regional Park (CVRP) is of particular importance within Buckinghamshire in this respect. Such features also play an important role in relation to landscape character, green belt and green infrastructure.</p> <p>We ask that the Grand Union Canal and its Aylesbury and Slough Arms are included in this section as part of an important ecological network and that the canal is included on map 5. If the canal is recognised in this section then we fully support the aims of Policy 19.</p> <p>Policy 25</p> <p>This policy states that Proposals for new or extensions to existing minerals and waste development must incorporate measures, on-site and/or off-site, to enhance Buckinghamshire's environmental assets and</p>	<p>These are not ecological networks in the same way as the networks identified on Map 5 are, they are more green infrastructure networks.</p>
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	<p>green infrastructure networks.</p> <p>The Trust supports this policy and would expect, that if a site is deemed to be acceptable in terms of its impact on the waterway that measures will be put in place to enhance the canal as a multi- functional environmental and Green Infrastructure asset.</p> <p>The trust would welcome a meeting with the Council to consider each potential site in more detail and to work together to identify any issues or opportunities associated with them.</p>	
Wendover Society	<p>The Wendover Society recognises the need to provide facilities for the management of minerals and waste in Buckinghamshire. It appreciates Buckinghamshire County Council's intention to "protect the amenity and the natural and historic environment" and to "minimise any negative impacts". (Bucks Minerals and Waste Core Strategy Development Plan Document November 2014)</p>	Noted.
Woodland Trust	<p>Planning authorities and inspectors increasingly act to prevent the direct destruction of ancient woodland. However, the damage and impacts posed to ancient woods by nearby development are not so widely appreciated. The Trust opposes the current iteration of the plan due to its potential impact on ancient woodland. We would like to take the opportunity to note several specific concerns and to register our interest in a number of sites with regard to your current consultation.</p>	<p>Policy 19 specifically addresses ancient woodland. Buffers/set-back distances are to be determined on a site-by-site basis through the planning application process.</p>

Site ref no.	Name or description of site	Nearest Town	Proposed Development description if indicated	Contains ancient woodland (AW); adjacent to AW or within AW?	Type of woodland affected? E.g. ASNW, PAWS Name of woodland Size of woodland affected (in Ha) 6 figure grid reference
M6	Slade Farm North	Hedgerley	Sand and Gravel Extraction	Adjacent	Birchen Spring Cottage PAWS 1.99 Ha Grid Ref SU963885 Slade Wood PAWS 1.38ha Grid Ref SU964887
M7	Slade Farm South	Hedgerley	Sand and Gravel Extraction	Adjacent	Slade Wood PAWS 1.38ha Grid Ref SU964887 Suttons Wood ASNW 2.39ha SU967876
High Wycombe: Sands Industrial Estate		High Wycombe	Area of Focus for Waste Management Use	Adjacent	Sunters Wood ASNW 64.8Ha Grid Ref SU 832929
High Heavens		Marlow	Area of Focus for Waste Management Use	Adjacent	Hillgreen Wood ASNW 11.4 Ha Grid Ref SU836901
Milton Keynes Fringe		Milton Keynes	Indicative area identified for general assessment purposes	Adjacent	Thickbare Wood ASNW 12.35 Ha Grid Ref SP810333 Unnamed ASNW 9.68 Ha Grid Ref SU811329
Westcott Venture Park		Westcott		Adjacent	Unnamed ASNW 2.5Ha Grid Ref SP699161

The Trust asks that a planted buffer of 50m should be provided between all mineral extraction sites and ancient woodland. The Trust would like to be consulted and engaged with any future applications on the above sites. A bespoke approach to buffering ancient woodland from waste operations must also be set out and adhered to.

Potential Impacts

Intensifying land uses adjacent to ancient woodland can have a significant impact upon the woodland in a number of different ways:

	<p>Waste disposal facilities have the potential to create substantial chemical impacts upon nearby ancient woodland. Chemicals, such as herbicides, pesticides, heavy metals, toxic or nutrient-rich leachates, and sulphur and nitrogen oxides, may reach ancient woodland from nearby development through a range of mechanisms. These include: aerosol or spray drift; contaminated surface and ground water flows; deposition of dust, particulate and gaseous pollution; localised acid-rain events; deliberate dumping of rubbish or garden waste into woodland; and accidental release or spillage of hazardous substances.</p> <p>Proximity to waste facilities may give rise to an increase in the risk of non-native plant species invading woodland on an on-going basis. Chemical effects on nearby ancient woodland include: population-level responses to lethal and sub-lethal doses of toxic chemicals, or nutrient enrichment, that can significantly alter the composition of the ground flora and lichens, mosses and liverworts growing on trees or rocks; reduced tree health by inhibiting root development and retarding growth, increased drought and frost susceptibility, defoliation, or leaf discoloration, poor crown condition, and the promotion of insect damage; poisoning of animals, leading to mortality, reduced feeding rates, or species avoidance; and loss of soil micro-organisms, including tree mycorrhizae, thereby affecting decomposition and nutrient cycling.</p> <p>Increased activity such as through mineral extraction can result in: modified local hydrological regimes; vibration; noise and light pollution; vehicular collisions with wildlife; external activity visible from within the wood; an increase in wind-blown litter accumulation; and tree surgery or felling along the woodland edge for safety reasons or subsidence prevention. Noise and light pollution interfere with interactions between species, affecting foraging and predation, reducing breeding success and thereby affecting on-going population viability. Disturbance may, therefore, lead to species being eliminated from woods. Vegetation clearance near to ancient woodland may affect woodland hydrology, increasing the likelihood of water-logging or drought and leading to loss of trees and changes in species composition. Soil compaction adjacent to woodland increases water run-off and soil erosion. It can cause severe damage to tree roots, leading to tree defoliation, crown dieback, and death.</p> <p>The Trust asks that ancient woodland is considered as a key constraint in the future development of these sites and that the appropriate planted</p>	
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	buffer is put in place. We would also take this opportunity to ask to be consulted on all forthcoming applications affecting ancient woodland.	
Aston Clinton Parish Council	Table 9 suggest that the area north of the A41 will be the primary focus. This area already has an anaerobic digester that emits noxious smells. The proposal to site further waste processes in this area will have a big impact on the viability of the proposed new housing developments adjacent. The combined effect of all this new development and the suggested increase of waste facilities in this area will have a severe impact on the sustainability of the traffic plan.	Any proposal put forward would be required to comply with relevant policies and standards, including those relating to odour, emissions to air (regulated by the EA) and transport.
Buckingham Town Council	Members ask for assurance that Tingewick Road could cope with the increased traffic for a waste sites, given the amount of residential development proposed currently, and whether it would be added to the gritting route schedule. Members would like to know how the 58% of waste derived from development sites is to be reduced.	Any proposals for waste development would need to have undertaken a Transport Assessment to address traffic impact of the proposal and what would need to be addressed if it shows up any issues. Defining gritting routes is the responsibility of BCC Highways and not the MWLP. The 58% stated in the response refers to CD&E waste making up 58% of the total waste arisings originating from within the county. A large proportion of CD&E waste is already re-used and recycled on site with a significant portion of the remaining waste going to beneficial purposes such as inert fill for restoration/engineering purposes. National targets and regulations/control measures are the primary mechanism for driving change at this level. The MWLP supports waste minimisation measures, including for CD&E waste (e.g. site waste management plans), through Policy 10 and paras 5.45 to 5.51.
Chesham Town Council	In respect to the proposal to utilise Asheridge Road in Chesham as a 'Secondary Area for Focus for Waste Management', Chesham Town Council is of the view that the planning permission granted for residential development on a large part of the site (the former 90 Asheridge Road site CH/2016/1770/FA) should be evidence for the County Council to reconsider this Preferred Option, not just for the part with permission, but for the remainder of the site in the context of wider employment needs in Chesham. Moreover, the difficulties envisaged with increased traffic along Asheridge Road/Bellingdon Road once the new housing had been built and occupied would mean that any such waste site in that area would only exacerbate the problem. On a related note, the Council wishes to express its disappointment that	That part of the industrial estate that now has permission for residential development can no longer form part of the employment area and the Table 9 location can therefore only relate to the remaining area. Due to the limited area that remains of the industrial location and that further elements here will be transferring over to residential use the rationale for continued inclusion as a secondary area of focus is much reduced and it will therefore be deleted from Table 9 in the Proposed Submission MWLP. Exhibitions are not required as part of local plan

	no consultation was undertaken directly in Chesham as part of the County Council's exhibitions.	consultations but nevertheless the Council chose to hold them at certain locations- these were selected on the basis of spreading venues around the county but also in relation to proposals in the MWLP (particularly proposed mineral extraction). On the basis of proposals in the Chesham/Amersham area one venue was chosen and this happened to be in Amersham.
Cuddington Parish Council	Cuddington and the local road network is adversely affected by traffic to the Calvert site. The Parish Council would like to see more rigorous controls, monitoring and enforcement through the traffic routing agreements for waste planning consents (Policy 18). In addition there should be tighter, direct controls on hauliers and waste management companies transporting waste through the appropriate licensing procedures.	Potential adverse impacts resulting from transport and appropriate mechanisms to avoid and/or minimise these to acceptable levels including routing agreements are to be determined on a site-by-site basis through the planning application process. The comment about Calvert traffic using local roads has been forwarded on to the highway authority and the waste management service.
Gerrards Cross Town Council	On page 25, it states that there are no sales figures for the Great Ouse Valley and that therefore its provision should be made from the Thames Valley. The lack of sales figures is not acceptable, does not justify this approach and should be estimated. On page 27, 4.39 uses historical site allocations to justify the future site allocations in the plan, which is not a valid conclusion. The fact that additional, contingency, sites can be opened immediately, without the need to justify the requirement for sand and gravel means that they should not be included in the 2017 MWLP, but held back until the following plan, presumably within another 5 years, based on historical trends. 4.46 on page 29, includes new landbank sites that will not be required for at least another 11 years, which does not justify including	Page 25 does not say this. That there is a lack of sales figures cannot be changed as there simply are not any (recent) sales from within the county for the secondary area. However, as noted on page 26 "sand and gravel extraction sites are permitted within the wider Great Ouse Valley east of the county. Data reported for such sites was taken into consideration, as was the operational relationship of the sites and phasing." This information was used to inform the identification of the provision rate for the secondary area. This was determined to be an appropriate way forward based on available evidence and local (and wider) circumstance. This paragraph provides context and demonstrated that there is active industry interest in the county for mineral extraction and so is relevant. The plan period is up to 2036 and so the provision to be made is that for the whole plan period, this takes account of permitted reserves with the remainder (preferably) to be made up by allocations. The identified allocations address this need and do result in a surplus. Logic would dictate that, as minerals can only be found where they occur, a perfect fit with respect to site yield and timing/phasing is not practical. There is likely to be

	<p>these for current extraction. North Park and Slade Farm should therefore be excluded from the plan.</p> <p>The estimate of 2.14Mt of waste in 5.5 is excessive and does not take account of the ongoing waste reduction programme. It assumes that growth of waste will be proportional to estimated population growth, which is not the case and, furthermore, was estimated in 2015 before Brexit, which is now therefore too high.</p> <p>In 5.14, it states that it is assumed that recycling, composting and recovery rates will not decrease. This is too conservative; they will increase substantially and an estimate should be provided by BCC.</p> <p>We disagree with the statement in 5.50 that states the case for local EfW facilities. The case for the Greatmore incinerator includes the disposal of all of BCC's non-recycleable domestic waste. There is therefore no case for additional local EfW facilities.</p> <p>We disagree with the statements in Policies 10 and 11 that proposals for major development should incorporate neighbourhood waste management facilities. They should support the use of the Greatmore EfW facility, which was designed specifically for this purpose.</p> <p>We disagree with Section 5.70, that the development of a new EfW facility for waste disposal beyond the needs of the County will be supported.</p>	<p>some overlap where industry interest to develop sites (particularly extension sites) is in the long term. This is actually beneficial as it ensures that not all of the sites are worked out over the short/medium term and that there is inbuilt flexibility within the plan should sites not be brought forward as anticipated.</p> <p>The estimates for waste arisings take account of anticipated waste reduction as per national policy and guidance. Details of assumptions made regarding waste growth are set out in the WNA and addendum report. The impact of Brexit is uncertain and adjusting forecasts based on this would be premature.</p> <p>The assumption that recycling, composting and recovery rates will not decrease recognises that these rates should increase and estimates are provided – refer to the WNA and addendum report.</p> <p>The Greatmoor EfW deals with the county municipal waste (which accounts for just 13% of total arisings) – the waste arisings and management needs also take into account C&I and CD&E waste. Para 5.50 refers to the use of RDF as an alternative fuel or where heat and energy can be utilized within a neighbourhood scheme or in industrial processes.” The potential need for additional EfW capacity and requirements to be met to justify this are set out in para 5.70 and 5.93.</p> <p>These policies capture all waste streams, not just municipal (which accounts for 13% of total waste arisings). The MWLP takes a wider view of waste planning matters, rather than just looking at municipal waste. With regards to municipal waste the policy provisions set out in Policy 10 and 11 could result in complementary measures to facilitate storage, sorting and collection of municipal waste leading to more efficient processing and better facility outputs.</p> <p>Again, the EfW deals with the county municipal waste (which accounts for just 13% of total arisings) – the waste arisings and management needs also take into account C&I and CD&E waste. The potential need for additional EfW capacity and requirements to be met to</p>
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	<p>The road network in Buckinghamshire is in a poor state of repair and unfit for purpose. As such, it cannot support the additional traffic required for additional mineral extraction. Policy 18 should require any highways to be used for such traffic to be fully restored and resurfaced.</p> <p>The Mineral Extraction policies need to be extended to cover the scenario where there is insufficient waste to fill mineral extraction sites.</p> <p>Policy 26 covers sites of a temporary nature being restored as soon as is practically possible. This needs to more specific e.g. should be fully restored within 5 years. Wapseys Wood is a case in point where it has been open for over 50 years, which could hardly be considered temporary, it has still not been fully restored, will not be accessible for a number of years and it now includes a permanent traveller site located on Green Belt land.</p>	<p>justify this are set out in para 5.70 and 5.93.</p> <p>Proposals for waste development will be required to take account of potential impacts on, and any necessary improvements to, the transport network through the planning application process.</p> <p>The waste needs assessment analyses and waste arisings projects these over the plan period, including for CD&E waste (of which inert fill forms part). The plan policy sets a clear preference for inert fill to be directed to mineral extraction sites to support restoration. The CD&E forecast shows, over the plan period 2016 to 2036, a total of 7.16Mt of inert waste for recovery/landfill including exempt/engineering, the remaining inert landfill capacity (includes permitted mineral sites undergoing restoration) at 2016 (up to 2036) was 3.49Mt, of which 3.1Mt is associated with restoration of quarries. Leaving 3.71Mt of inert waste arisings available for inert fill supporting restoration of quarries (in future). Recent trends indicate that more inert waste may be being directed towards inert recovery (fill).</p> <p>In addition some soils/excavation materials are retained on-site and used as fill, it should also be noted restoration may include water bodies as part of a mosaic of habitats and re-profiling to lower levels may occur. The emphasis in the plan is to ensure that the plan includes robust policies to ensure that inert waste fill/recovery is focussed on restoration of quarries and not other sites (where this would prejudice restoration of quarries) this is achieved through the plans policies - Policy 11 and Policy 13.</p> <p>Such matters need to be assessed and determined on a site-by-site basis and take account of local circumstance and operational requirements.</p>
Hedgerley Parish Council	<p>HPC objects to Policy 2, Policy 7, Policy 11, Policy 13 and Policy 15</p> <p>Policy 2: Spatial Strategy for Minerals Development states that “The spatial strategy for minerals development in Buckinghamshire is to support the recycling and processing of alternative aggregates at locations well linked to strategic transport networks and main urban areas, growth locations and key settlements, with a</p>	<p>The parish councils comments about the Green Belt are noted. The parish council clearly sees the Green Belt as a reason to not proceed with extraction at this particular site. However they will be aware that all of the current operational and committed sites for sand and gravel extraction in the county are within the Green Belt and</p>

	<p>preference for the following locations: mineral extraction sites, on-site as an ancillary activity to construction or demolition projects, committed waste management facilities, within the areas of focus for waste management use, existing industrial sites or on land that is permitted or allocated for general industrial development, and existing and disused railheads and wharves”.</p> <p>Representations</p> <p>This policy does not accord with the National Planning Policy Framework (NPPF) (paragraphs 87, 88 and 90) and the National Waste Planning Policy (NWPP), since it fails to recognise the special protection to be afforded to sites located in the Green Belt and the fact that the NPPF makes it clear that such developments (as distinct from “mineral extraction”) are “inappropriate development” and therefore should only be approved [or “preferred” in this instance] if the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (“very special circumstances”).</p> <p>When announcing the publication of the NWPP on 15th October 2014 the Secretary of State for Communities and Local Government drew attention to the fact that the new policy strengthens and underlines the Government’s commitment to protecting the Green Belt from development. He went on to say that the Government has “emphasised the special protection given to the Green Belt, and made clear our expectation that when preparing local plans, waste planning authorities will work collaboratively with other planning authorities to first look for suitable sites and areas outside the Green Belt. We have also removed reference in previous policy that waste planning authorities should give significant weight to locational need and wider environmental and economic benefits when considering waste planning applications in the Green Belt.”</p> <p>The Secretary of State added that “this approach brings national waste planning policy into line with the national planning policy framework, which makes clear that most types of new development should only be approved in the Green Belt in very special circumstances. This maintains and enhances the stringent protection against inappropriate development in the Green Belt.”</p> <p>The effect of Policy 2 is also to define “minerals development” as including mineral extraction, recycling and processing of alternative aggregates only. The policy clearly also needs to address the question of where other forms of ancillary minerals development (i.e.</p>	<p>there are also operational and committed sites in Green Belt in neighbouring areas such as Hertfordshire, Surrey and Berks, many granted since the NPPF was published; additionally there is nothing exceptional about Slade Farm in comparison to all of these other sites in respect of preserving the openness of the Green Belt. It is noted that the NPPF did tighten up on waste development in the Green Belt and that thus illustrates why as a consequence there are no waste allocations or land safeguarded for waste use in the Green Belt identified in the MWLP. However mineral extraction is not inappropriate development in the Green Belt and bearing in mind that mineral resources can only be worked where they are found, if extraction was not to be permitted in Green Belt areas then this would effectively sterilise the resource in these areas. Mineral extraction is also temporary development and extraction is normally carried in stages with restoration taking place progressively thus reducing impact and therefore not impacting on the openness of the Green Belt to the extent that this becomes inappropriate development. It is accepted that some development that can accompany mineral development, notably concrete batching plants, would not be considered to be ‘county matter’ development if they were standalone development. The MWLP only covers county matter development and so the likes of concrete batching plants are not covered in it.</p> <p>Policy 22 deals with the Green Belt and with the MWLP being read as a whole there is no need to reference the Green Belt in other policies.</p>
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	<p>developments which are related but not essential to the carrying out of mineral extraction) should be located e.g. concrete batching and mortar plants, concrete block manufacturing, workshops etc.</p> <p>Action required</p> <p>The third bullet point in Policy 2 should be reworded as follows: “support ancillary minerals development (i.e. developments which are related but not essential to the carrying out of mineral extraction) at locations outside the Green Belt and which are wholly or mainly reliant on the minerals won at the site and which are well linked to strategic transport networks and main urban areas, growth locations and key settlements.</p> <p>The recycling and processing of alternative aggregates will also be supported at locations outside the Green Belt at locations which are well linked to strategic transport networks and main urban areas, growth locations and key settlements - with a preference for the following locations: on-site as an ancillary activity to construction or demolition projects, committed waste management facilities, within the areas of focus for waste management use, existing industrial sites or on land that is permitted or allocated for general industrial development.</p> <p>Planning permission will not be granted for such developments at locations within the Green Belt unless the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (‘very special circumstances’).</p> <p>Policy 7: Provision of Secondary and Recycled Aggregates states that: “Favourable consideration will be given to proposals for facilities for secondary and recycled aggregates. Permission will be granted where it can be demonstrated that potentially adverse impacts are able to be avoided and/or minimised to acceptable levels and that the proposal is compliant with relevant MWLP policies.</p> <p>Preference will be given towards sites at the following locations:</p> <ul style="list-style-type: none"> <input type="checkbox"/> on-site as an ancillary activity to construction or demolition projects, <input type="checkbox"/> committed waste management facilities or within the areas of focus for waste management where the proposed use accords with the type of waste use either existing at that location, or is complementary to the current economic role, status and uses of the employment area (where applicable), <input type="checkbox"/> existing industrial areas or on land that is permitted or allocated for general industrial development, and <input type="checkbox"/> existing and disused railheads and wharves. 	<p>The plan is to be read as a whole, please refer to Policy 22, which covers Green Belt matters. There is no need to address the Green Belt in every policy.</p> <p>Other forms of minerals development would be required to comply with relevant local plan policies and national policy, nevertheless the supporting text can be amended to reflect this.</p> <p><u>7.51 Elements of development considered integral to extractive operations (other than those necessary for the winning of mineral) include those associated with access and restoration. The deposit of inert waste to land to facilitate restoration of mineral extraction sites may be required to preserve the openness of the Green Belt, and so need not conflict with the purposes of including land in the Green Belt. Other forms of development, including on-site processing, would need be assessed</u></p>
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	<p>For sites where the primary use is temporary (e.g. mineral extraction and where associated with construction or demolition projects), permission will be granted for a period not exceeding the permitted life of the primary use. Specifically regarding proposals on mineral extraction sites, permission will only be granted where there is no conflict with the approved restoration scheme. Development of temporary facilities for the recovery and recycling of inert materials, including inert wastes, must demonstrate that the materials will be recycled and reused (as far as practicable) onsite.”</p> <p>Representations</p> <p>This policy does not accord with the National Planning Policy Framework (NPPF) (paragraphs 87, 88 and 90) and the National Waste Planning Policy (NWPP), since it fails to recognise the special protection to be afforded to sites located in the Green Belt and the fact that the NPPF makes it clear that such developments are “inappropriate development” and therefore should only be approved [or “preferred” in this instance] if “very special circumstances” can be demonstrated.</p> <p>When announcing the publication of the NWPP on 15th October 2014 the Secretary of State for Communities and Local Government drew attention to the fact that the new policy strengthens and underlines the Government’s commitment to protecting the Green Belt from development. He went on to say that the Government has “emphasised the special protection given to the Green Belt, and made clear our expectation that when preparing local plans, waste planning authorities will work collaboratively with other planning authorities to first look for suitable sites and areas outside the Green Belt. We have also removed reference in previous policy that waste planning authorities should give significant weight to locational need and wider environmental and economic benefits when considering waste planning applications in the Green Belt.”</p> <p>The Secretary of State added that “this approach brings national waste planning policy into line with the national planning policy framework, which makes clear that most types of new development should only be approved in the Green Belt in very special circumstances. This maintains and enhances the stringent protection against inappropriate development in the Green Belt.”</p> <p>Action required</p> <p>Policy 7: Provision of Secondary and Recycled Aggregates should be reworded as follows:</p>	<p><u>on a site-by-site basis against relevant MWLP policies and national policy.</u></p>
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	<p>“Favourable consideration will be given to proposals for facilities for secondary and recycled aggregates where located outside the Green Belt. Permission will be granted where it can be demonstrated that potentially adverse impacts are able to be avoided and/or minimised to acceptable levels and that the proposal is compliant with relevant MWLP policies.</p> <p>Preference will be given towards sites at the following locations:</p> <ul style="list-style-type: none"> <input type="checkbox"/> on-site as an ancillary activity to construction or demolition projects, <input type="checkbox"/> committed waste management facilities or within the areas of focus for waste management where the proposed use accords with the type of waste use either existing at that location, or is complementary to the current economic role, status and uses of the employment area (where applicable), <input type="checkbox"/> existing industrial areas or on land that is permitted or allocated for general industrial development, and <input type="checkbox"/> existing and disused railheads and wharves. <p>For sites where the primary use is temporary (e.g. mineral extraction and where associated with construction or demolition projects), permission will be granted for a period not exceeding the permitted life of the primary use.</p> <p>Specifically regarding proposals on mineral extraction sites, permission will only be granted where there is no conflict with the approved restoration scheme.</p> <p>Development of temporary facilities for the recovery and recycling of inert materials, including inert wastes, must demonstrate that the materials will be recycled and reused (as far as practicable) onsite.</p> <p>Planning permission will not be granted for such developments at locations within the Green Belt unless the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (‘very special circumstances’).</p> <p>Policy 11: Spatial Strategy for Waste Management states (inter alia) that: “Within rural areas, and where not inappropriate within the Green Belt, the development of facilities that incorporate the biological treatment of waste or that are incompatible with urban development will be supported and given priority where: (i) associated with existing rural employment uses or farm-based enterprises; and/or (ii) involving the re-use of previously developed land, redundant agricultural and forestry buildings and their curtilages</p> <p>Opportunities to co-locate waste management facilities together and with</p>	<p>The plan is to be read as a whole, please refer to Policy 22, which covers Green Belt matters. There is no need to address the Green Belt in every policy.</p> <p>If such development (inert disposal) preserves the openness of the Green Belt then it would not be “inappropriate development”. The restoration of mineral sites would do this as well as returning the land to its</p>
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	<p>complementary activities will be supported particularly where relating to industrial estates, waste management sites, and mineral extraction and processing sites (for proposals for aggregate and/or inert recycling facilities)</p> <p>.....</p> <p>The provision of inert disposal capacity is to be focused at existing and allocated mineral extraction sites to facilitate restoration.”</p> <p>Representations</p> <p>This policy does not accord with the National Planning Policy Framework (NPPF) (paragraphs 87, 88 and 90) and the National Waste Planning Policy (NWPP), since it fails to recognise:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the fact that all forms of waste management are “inappropriate development” in the Green Belt; and <input type="checkbox"/> the special protection to be afforded to sites located in the Green Belt and the fact that the NPPF makes it clear that such developments (as distinct from “mineral extraction”) are “inappropriate development” and therefore should only be approved [or “preferred” in this instance] if “very special circumstances” can be demonstrated. <p>When announcing the publication of the NWPP on 15th October 2014 the Secretary of State for Communities and Local Government drew attention to the fact that the new policy strengthens and underlines the Government’s commitment to protecting the Green Belt from development. He went on to say that the Government has “emphasised the special protection given to the Green Belt, and made clear our expectation that when preparing local plans, waste planning authorities will work collaboratively with other planning authorities to first look for suitable sites and areas outside the Green Belt. We have also removed reference in previous policy that waste planning authorities should give significant weight to locational need and wider environmental and economic benefits when considering waste planning applications in the Green Belt.”</p> <p>The Secretary of State added that “this approach brings national waste planning policy into line with the national planning policy framework, which makes clear that most types of new development should only be approved in the Green Belt in very special circumstances. This maintains and enhances the stringent protection against inappropriate development in the Green Belt.”</p> <p>Action required</p>	<p>original form and agricultural nature. Incidentally if you were to take account of the exhortation to first look for suitable sites outside of the Green Belt, then for inert disposal you would look first at filling extraction sites outside of the Green Belt, except that the extraction sites (other than the site in the Great Ouse Valley) are all within the Green Belt anyway.</p> <p>As the MWLP is to be read as a whole, please refer to Policy 22, which covers Green Belt matters. There is no need to address the Green Belt in every policy.</p>
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	<p>The above sections of Policy 11: Spatial Strategy for Waste Management should be reworded as follows:</p> <p>“Within rural areas outside the Green Belt, the development of facilities that incorporate the biological treatment of waste or that are incompatible with urban development will be supported and given priority where: (i) associated with existing rural employment uses or farm-based enterprises; and/or (ii) involving the re-use of previously developed land, redundant agricultural and forestry buildings and their curtilages</p> <p>Opportunities to co-locate waste management facilities together and with complementary activities will be supported where outside the Green Belt particularly where relating to industrial estates, waste management sites, and mineral extraction and processing sites (for proposals for aggregate and/or inert recycling facilities)</p> <p>The provision of inert disposal capacity is to be focused at existing and allocated mineral extraction sites where outside the Green Belt to facilitate restoration. Planning permission will not be granted for such developments at locations within the Green Belt unless the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (‘very special circumstances’).</p> <p>Policy 13: Disposal to Landfill states, inter alia, that “no specific capacity will be provided for inert disposal during the plan period. Inert waste disposal should be focused at existing and allocated mineral extraction sites to facilitate restoration.....”</p> <p>Representations</p> <p>This aspect of Policy 13 does not accord with the National Planning Policy Framework (NPPF) (paragraphs 87, 88 and 90) and the National Waste Planning Policy (NWPP), since it fails to recognise:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the fact that all forms of waste management (including inert landfilling as a means of restoring a mineral extraction site) are “inappropriate development” in the Green Belt; and <input type="checkbox"/> the special protection to be afforded to sites located in the Green Belt and the fact that the NPPF makes it clear that such developments (as distinct from “mineral extraction”) are “inappropriate development” and therefore should only be approved [or “preferred” in this instance] if “very special circumstances” can be demonstrated. <p>When announcing the publication of the NWPP on 15th October 2014 the Secretary of State for Communities and Local Government drew attention</p>	<p>See above-there is no need to address the Green Belt in every part of this policy.</p>
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	<p>to the fact that the new policy strengthens and underlines the Government’s commitment to protecting the Green Belt from development. He went on to say that the Government has “emphasised the special protection given to the Green Belt, and made clear our expectation that when preparing local plans, waste planning authorities will work collaboratively with other planning authorities to first look for suitable sites and areas outside the Green Belt. We have also removed reference in previous policy that waste planning authorities should give significant weight to locational need and wider environmental and economic benefits when considering waste planning applications in the Green Belt.”</p> <p>The Secretary of State added that “this approach brings national waste planning policy into line with the national planning policy framework, which makes clear that most types of new development should only be approved in the Green Belt in very special circumstances. This maintains and enhances the stringent protection against inappropriate development in the Green Belt.”</p> <p>Action required</p> <p>The above section of Policy 13: Disposal to Landfill should be reworded as follows:</p> <p>“no specific capacity will be provided for inert disposal during the plan period. Inert waste disposal should be focused at existing and allocated mineral extraction sites which are outside the Green Belt to facilitate restoration.....”</p> <p>Policy 15: Development Principles for Waste Management Facilities states, inter alia, that:</p> <p>“Preference will be given to proposals for sites within the areas of focus for waste management in the MWLP. Where the proposal is not located within an area identified for waste management use preference will be for proposals that integrate and co-locate waste management facilities together and with complementary activities, or maximise the use of previously developed land or redundant agricultural and forestry buildings (and their curtilages)</p> <p>Where it can be clearly demonstrated that additional landfill capacity for residual wastes should be provided, preference would be for an extension to an existing site, unless it can be shown that a standalone site would be more sustainable and better located to support the management of waste close to its source</p> <p>Provision for inert waste disposal or recovery should be made at mineral</p>	<p>See above- there is no need to address the Green Belt in every policy.</p>
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	<p>extraction sites requiring restoration, unless it can be clearly demonstrated that an alternative location would not prejudice the restoration of these sites.”</p> <p>Representations</p> <p>These aspects of Policy 15 do not accord with the National Planning Policy Framework (NPPF) (paragraphs 87, 88 and 90) and the National Waste Planning Policy (NWPP), since they fail to recognise:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the fact that all forms of waste management are “inappropriate development” in the Green Belt; and <input type="checkbox"/> the special protection to be afforded to sites located in the Green Belt and the fact that the NPPF makes it clear that such developments should only be approved [or “preferred” in this instance] if “very special circumstances” can be demonstrated. <p>When announcing the publication of the NWPP on 15th October 2014 the Secretary of State for Communities and Local Government drew attention to the fact that the new policy strengthens and underlines the Government’s commitment to protecting the Green Belt from development. He went on to say that the Government has “emphasised the special protection given to the Green Belt, and made clear our expectation that when preparing local plans, waste planning authorities will work collaboratively with other planning authorities to first look for suitable sites and areas outside the Green Belt. We have also removed reference in previous policy that waste planning authorities should give significant weight to locational need and wider environmental and economic benefits when considering waste planning applications in the Green Belt.”</p> <p>The Secretary of State added that “this approach brings national waste planning policy into line with the national planning policy framework, which makes clear that most types of new development should only be approved in the Green Belt in very special circumstances. This maintains and enhances the stringent protection against inappropriate development in the Green Belt.”</p> <p>Action required</p> <p>The above sections of Policy 15: Disposal to Landfill should be reworded as follows:</p> <p>“Preference will be given to proposals for sites outside the Green Belt and within the areas of focus for waste management in the MWLP. Where the proposal is not located within an area identified for waste</p>	
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	<p>management use preference will be for proposals that integrate and co-locate waste management facilities together and with complementary activities, or maximise the use of previously developed land or redundant agricultural and forestry buildings (and their curtilages)</p> <p>Where it can be clearly demonstrated that additional landfill capacity for residual wastes should be provided, preference would be for an extension to an existing site, unless it can be shown that a standalone site would be more sustainable and better located to support the management of waste close to its source</p> <p>Provision for inert waste disposal or recovery should be made at mineral extraction sites requiring restoration, unless it can be clearly demonstrated that an alternative location would not prejudice the restoration of these sites.”</p> <p>Planning permission will not be granted for such developments at locations within the Green Belt unless the potential harm to the Green Belt and any other potential harm is clearly outweighed by other considerations (‘very special circumstances’).</p>	<p>See above-there is no need to address the Green Belt in every policy.</p>
Iver Parish Council	<p>Many of the questions posed involve areas outside the expertise of those not closely involved with these matters. My concerns are more to do with whether the Authority has the resources and commitment to work with other bodies to ensure that there is “joined up” thinking and action to implement the policies in a way that best serves the community and the environment.</p>	<p>The various parts of the County Council have and will continue to work with partners (including the district council and the parish council) and other stakeholders in respect of Iver parish.</p>
Mentmore, Crafton and Ledburn Parish Council	<p>The DPO at para.5.94 rightly observes that the MWLP should contain clear guidance on how applications for waste development will be decided and para. 7.2 correctly states that one of the key roles of the MWLP is to set out a decision-making and policy framework to assist in controlling and managing the impact of waste development on other forms of land use. However, while the DPO does contain a variety of statements about the need to avoid unacceptable impacts and encourages sustainable transport, it is disappointing that these statements are not backed up with clear and effective policies making it clear that proposals which would be unsustainably located or give rise to amenity, environmental, traffic or other impacts will be refused permission.</p> <p>The content on Spatial Strategy (5.52-62) makes no reference to the importance of proposals in rural areas being sustainably located, having sustainable transport links and avoiding impacts on villages and heritage</p>	<p>The current national context of plan-making is that plans should be positively prepared and align with the presumption in favour of sustainable development. Proposal that do not comply with the MWLP policies would not be permitted.</p> <p>The plan is to be read as a whole and these matters are addressed through relevant policies.</p> <p>Policy 17 addresses human health and wellbeing and amenity to communities, among other matters.</p> <p>Policy 18 addresses transport. Potential adverse impacts resulting from transport and appropriate mechanisms to avoid and/or minimise these to acceptable levels including routing agreements are to be determined on a site-by-site basis through the planning application process.</p>

	<p>assets. The accompanying policy, Policy 11, is completely silent on these important issues. Both the accompanying text as well as Policy 11 should refer to these matters.</p> <p>Policy 15 is a key policy setting out the development principles for waste management facilities against which proposals will be assessed. It is very disappointing that there is nothing about the need for sustainable location and transport links and the avoidance of impact on settlements, their residents, roads and heritage assets. MPC ask that these matters are included as specific development principles and that the policy should state that proposals which cannot demonstrate compliance with all the relevant principles will be rejected.</p> <p>Para. 7.5 states that waste development must be controlled and managed to avoid unacceptable impacts on amenity and the quality of life. That is a laudable objective but will be ineffective without proper policies to ensure that such impacts are avoided. Policies should state clearly that proposals which cannot be controlled and managed to avoid those impacts will be refused. The same paragraph states that Policy 18 deals with adverse impacts arising from waste transport. However, this policy merely sets out a list of matters to be addressed in a TA/TS. It is a particularly limp policy and MPC suggest it should be recast to make it explicit that all proposals will be rejected unless applicants can demonstrate their proposed development will not cause unacceptable impact on the rural road network or on settlements through which their traffic would travel and that legally binding planning obligations are in place to ensure that the traffic generated adheres to routing restrictions.</p> <p>Policy 17 deals with managing impacts on amenity and natural resources. The impacts to be considered under this policy are preclusively defined. This should be changed to an inclusive list so that other impacts which should be considered can be. For example the listed impacts make no reference to impacts on heritage assets. A decision which failed to have regard to impacts on listed buildings and conservation areas would be legally flawed.</p> <p>Further, the policy should be recast to make it plain that it is dealing with avoiding impacts rather than managing them. Again, it should state that proposals which cannot demonstrate that they avoid these impacts will be refused.</p> <p>Para 7.19-25 deals with sustainable transport. MPC have already commented on Policy 18. Para. 7.22 acknowledges that the transport of</p>	<p>Policy 20 addresses the historic environment.</p> <p>Policy 29 The scope of what planning obligations can legally address is not determined by the council. Para 8.3 identifies areas where conditions and obligations would be utilised in relation to the granting of planning permission.</p>
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	<p>waste can impact on the amenity of local people along the transport routes followed. However, the paragraph merely states that the council will “seek to minimise such impacts where possible”. This is an overly weak and ineffective stance. Proposals which would be likely to give rise to unacceptable amenity impacts should be refused and this should be clearly stated and contained in policy. Routing agreements should be essential in all situations where there is a clear risk of HGVs using unsuitable roads and causing impact on sensitive settlements. This should be clearly stated in the text and included in a policy. However, the council should recognise the limitations of section 106 obligations. As the residents of Mentmore are acutely aware from the daily procession of skip hire lorries through the village, such undertakings are widely disregarded, especially where through lack of resources or other reasons they are not properly monitored.</p> <p>A more effective way of keeping HGVs out of sensitive villages may be to impose a weight restriction over entire villages.</p> <p>Para. 7.23 is a better articulation than the preceding paragraph, but the substance of what it states should be included in a policy and has not been.</p> <p>The commentary on the Historic Environment and Policy 20 is confined to the direct effects of development on heritage assets and says nothing about the indirect effects, in particular the impact of HGVs on Conservation Areas. Both should be amended to include specific reference to the harmful effects on heritage assets of transporting waste through historic and characterful villages such as Mentmore.</p> <p>In addition to the points already made above in relation to routing agreements, MPC suggest that the Plan should not state that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (para. 8.4). A legally binding planning obligation can be enforced more quickly and effectively (through court injunctions) than the cumbersome enforcement regime for breach of a condition which may lead to an appeal and attempts to remove or alter the condition. In any event, a routing agreement could not properly be contained in a condition. Policy 29 should be amended to make specific reference to the need for planning obligations dealing with traffic routing to be entered into in any case where there is a likelihood of HGVs travelling through sensitive villages or on unsuitable roads. (The second indent in the policy is misleading: “planning</p>	
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	<p>obligation” is the generic term for both legal agreements and unilateral undertakings). The fourth indent only requires the MWPA to monitor and enforce conditions: this must be extended to include planning obligations. Further, as already pointed out, a weight restriction may be an effective way to keep HGVs away from sensitive settlements and unsuitable roads and this should be included as a possible action in the policy.</p> <p>The DPO should contain more explicit policy content rather than relying on platitudinous statements. The policies should be more focussed on the avoidance of harm rather than “managing” impacts. The policies require much stronger emphasis on avoiding HGVs passing through sensitive settlements. Policies should be recast to make explicit that proposals will be rejected unless applicants can demonstrate that unacceptable impacts will be avoided. Routing restrictions delivered by planning obligations must be insisted upon where there is a risk of harm and damage caused by HGVs and the Council should give stronger commitment to effective monitoring and enforcement of both conditions and planning obligations.</p>	
<p>Aylesbury Vale District Council</p>	<p>General point the Plan the need for a replacement plan at this time does not seem to be fully justified. There is an extant and up to date plan approved in 2012 & not a lot seems to have changed (acknowledged in the current draft plan itself). Moreover, this is a period of potential significant change for Buckinghamshire and is it prudent to hold fire on any new plan until this outcome from this change becomes clearer?</p> <p>AVDC published submission draft Local Plan promoting significant growth although over half is committed; Aylesbury granted Garden Town status – and amongst other considerations we will all be looking at innovation methods for waste disposal/collection; Wycombe Local Plan close to finalisation; new housing figures (and calculation methodology) published by Government; Oxford to Cambridge Growth arc developing proposals; major infrastructure projects starting through Bucks; London Plan – the list goes on.</p> <p>As there is an extant plan up to date wouldn't it be prudent to see how the next couple of years settle out rather than pushing forward with a plan that may need review as soon as published?</p> <p>The draft Plan very much reads as a document in isolation. There is very little reflection of interaction or acknowledgement (Duty to Co-operate) with surrounding authorities or reference to the Districts Councils within Bucks and the important roles undertaken as planning and waste</p>	<p>As AVDC should know DCLG counts local plans as being out of date after 5 years and so a plan adopted in 2012 should now be being reviewed.</p> <p>New proposals and schemes come forward regularly for implementation and therefore if you waited until all had been agreed then you would be waiting a long time. If prematurity in advance of key developments not being known is an argument you wish to make then the same could be said about your local plan being progressed in advance of the route of the Oxford-Cambridge Expressway not being finalised as its alignment will be an overriding factor in the long term disposition of residential development for a local plan that addresses housing matters.</p> <p>The MWLP covers the necessary context within the Buckinghamshire Context sub-section of Chapter 2 (paras 2.12-2.25). Para 1.4 states that the MWLP along with the Local Plans prepared by the district planning</p>

	<p>collection authorities. In this context the plan presents a view as from a unitary authority and does not reflect the dual roles currently present in Bucks. This is particularly apparent within the waste sections and the blanket approach to the employment sites in Aylesbury & Buckingham.</p> <p>The approach of utilising significant amounts of employment land for new waste facilities also raises concerns. In discussions with the county council at Bucks Planning Policy Officers Group the figure of 50ha was referred to as potentially being required to meet the need of the M&WLP. The loss of such a significant amount of employment land could have a significant impact on the employment potential of all the Bucks councils and could mean that further land will need to be allocated to ensure appropriate levels of economic development. It is suggested that this potential knock on effect has not been addressed properly by the M&WLP.</p> <p>It is disappointing that the M&WLP makes no reference anywhere in the document to the Bucks Waste Partnership (BWP), which exists to discuss waste management and recycling throughout the County. The waste Partnership consists of representatives from each Buckinghamshire Local Authority along with a representative from the County. As this is a recognised partnership already in existence, it is not understood why it is not referenced in the Plan. Hopefully this does not indicate a reduction in the intention to continue to work with or consult on future waste development plans with members of the BWP or the authorities within the county.</p> <p>Emphasising the above point the Plan makes next to no reference of the current local plan proposals for AVDC & Wycombe or indeed only a glancing reference to Aylesbury Garden Town and the vision for the future. The vision presented under section 3 has only a cursory reference to growth and what is happening across the County. As the generation of waste and need for minerals is closely related to the location of new development it is surprising that there isn't a closer</p>	<p>authorities in the county form the Development Plan for Buckinghamshire- there is no need for it to give a description of the roles of the various planning authorities in the county. It is noted that the Proposed Submission Vale of Aylesbury Local Plan in para 1.1 uses a part of one sentence to reference that the county council is responsible for producing minerals and waste local plans and therefore takes an identical approach- it does not describe the various roles and responsibilities. Table 8 of the Draft Plan gives the broad indicative number of waste facilities required to meet the capacity gap identified. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these areas, then it is likely there will be a limited number of facilities (probably one at most) coming forward at each location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. It should also be noted that a waste management use is a job creating use of an industrial in nature that is appropriate to site on a general industrial estate.</p> <p>It should be noted that this is a spatial/land use plan for minerals and waste- it is not a plan for municipal waste and there is no specific need to reference this partnership in the MWLP. The municipal waste model and Joint Waste Strategy has been fully taken into account and reference is made to it in the plan (ref Para 5.14, amongst others).</p> <p>The plan is not about referencing detail that unnecessarily bulks out the plan, it is about planning for minerals and waste in Buckinghamshire as concisely as appropriate. Nevertheless para 2.19 notes Aylesbury's Garden Town status. It should also be noted that the Briefing Note on the Spatial Strategy for Waste that accompanies the preferred options document discusses</p>
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	<p>relationship between this plan and the district councils' plans. For the above reasons it is suggested that the need for a revision/up date of the existing M&WLPlan is not an urgent priority and could be reconsidered after there is more detail or certainty of where the County/general area is going, particularly in the longer term when the impact of the further development pressure outlined above will all need to be addressed. The justification for the plan proceeding at this point in time should therefore be clearly set out in the M&WLP.</p> <p>For completeness the following specific comments are made on the content of draft plan as published for consultation. Please note that much of the comments relate to the District Council's role as waste collection authority.</p> <p>The preferred options consultation stage – Point 5 - The waste planning strategy was primarily built around " a single strategic Waste complex to include energy recovery at Calvert Landfill" – which is now complete and operational – shouldn't this figure in the overview section – or be explained how the strategy has changed from the previous Plan?</p> <p>Section 2 general comments - a local approach to planning for needs for minerals & waste would seem sensible in principle but while there is a common reference to the larger towns in Bucks there is hardly any reference of a role for Chesham/Amersham in this strategy - this omission is common throughout the plan.</p> <p>Similarly there does seem a constant attraction/reference to Buckingham in the Plan particularly as support for mineral extraction in the north of the Aylesbury Vale District. There is planned growth at Buckingham in the Neighbourhood Plan and VALP but over half the proposed growth is committed.</p> <p>In itself growth at Buckingham does not constitute justification for the proposed extraction area at Hydellane Farm.</p>	<p>matters relating to growth and how this has framed the spatial strategy. Notwithstanding that the preface does explain why the council is moving ahead with a new plan, the need to have an up to date adopted plan that is not considered to be out of date by DCLG because it was adopted more than five years is surely an over-riding reason to progress the MWLP?</p> <p>The purpose of a local plan is not to explain how things have changed from the last one but to set out a clear strategy for the future. The MWLP covers a wider scope of waste streams than just municipal waste, the EfW is operational and provides significant capacity for recovery of municipal waste. The WNA also addresses C&I, CD&E and hazardous wastes and shows a continuing need for some new facilities to be provided in the county to ensure that other waste streams are also managed sustainably. The plan seeks to achieve net self-sufficiency this does not preclude waste imports and exports. This is clearly recognised in the plan. This approach is in line with the NPPW.</p> <p>The respondent does not appear to have read the accompanying material to the plan. The Briefing Paper on the Spatial Strategy for Waste sets out how this was developed and how the MWLP treats Chesham and Amersham.</p> <p>For waste the MWLP references Buckingham as a growth location but that growth should be commensurate with the town's population. It should be noted that a number of the town's significant commitments have not yet commenced development and this, along with the proposed allocations in the draft Vale of Aylesbury Plan, ensure continued significant growth for the town.</p>
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	<p>Para 2.6- Similar to the comments in Point 5 above this was the argument used to support the EfW build - is this still relevant. Our understanding is that only inert or non inert non hazardous waste should still be going to Landfill. There is general concern that increases in landfill tax leads to increased fly tipped waste.</p> <p>Para 2.11/Table 11 – support the overall strategy although it is our contention that the current provision of bio waste facilities in the north is limited and needs supporting/improving now – rather than waiting for a M&WLP to come forward.</p> <p>Para 2.22 -. The last sentence only looks at the BCC side and this has been subject to ongoing debate between the authorities on the need to make effective provision for commercial waste collected by AVDC in the past. The EPA allows for commercial waste collection and disposal. I believe it remains a statutory obligation for both the collection and disposal authority to provide commercial collection at the request of a commercial organization.</p> <p>Para 3.2 Vision – The statement in the Vision implies that dry recyclables will be managed within county boundary's but BCC do not have control of dry recyclable waste this is the remit of District Councils. However if the Vision is to pool all dry materials across the County then the viability of an MRF and cost reduction/income increase for the materials could be realised for all councils. The Vision is written as if BCC has overall responsibility for all waste actions. This is misleading and not the case. AVDC have the responsibility for the promotion and recycling of household wastes and have partnered with other authorities outside of the Bucks County to achieve the most beneficial results.</p> <p>Para 3.4 S01 - Confused by the last sentence as surely EfW is the primary disposal route for local authority collected waste?</p> <p>Para 3.4 S04 – general support but need consultation/discussion on how this is achieved. Currently AVDC have multiple tipping locations for waste and co location should not lead to increased costs or unnecessary travel/journey miles.</p>	<p>The identification of the Great Ouse Valley secondary area of focus, including the allocation at Hydelane Farm, is to encourage some production in the north of the county- this could support growth and new development in more than just the Buckingham part of Aylesbury Vale. The MWLP covers waste streams other than municipal waste. Increases in landfill tax are outside of the scope of the MWLP.</p> <p>The MWLP seeks to facilitate delivery of such development, development of such facilities on the ground is to be brought forward by the waste industry.</p> <p>Commercial contracts are outside of the scope of the MWLP.</p> <p>The County Council is the WPA and therefore responsible for the determination of planning applications regarding waste development. This covers waste streams other than municipal.</p> <p>S01 - EfW is not disposal – it is classed as recovery. Incineration without energy recovery is classed as disposal.</p> <p>S04 – The strategic objectives do not form policy. How the objectives are to be achieved is taken forward through the plan policies and allocations/designations.</p>
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	<p>Section 4 Like other proposals in the draft Plan the identification of Hydellane Farm in the Ouse valley seems premature and no clear cut evidence that it is required/needed. While it may be an intention of the plan to provide balance there does need to be clear need and justification which does not come forth in the draft Plan. The Plan notes the clear differences in the Ouse Valley East and west of Milton Keynes reflected in the secondary designation of Hydellane compared to other sites in the County. Paragraph 4.53 confirms that there is adequate provision for the whole of the plan area to beyond 2036 but, again, paragraph 4.54 refers to growth at Buckingham as a support for extraction at Hydellane Farm. There may well be other more detailed concerns with Hydellane Farm based on landscape issues in the Ouse Valley and traffic onto the A422 but our prime concern is that a clear justification for the extraction area is not there. Until such justification is forthcoming Hydellane Farm, should be taken out of Policy 4. Borrow Pits & Extraction as an Ancillary Activity – should the possible impacts of the construction of HS2/EWR be considered under this section?</p> <p>Energy Minerals – Fracking concerns have previously been raised by Members at both District & County levels. Bearing this in mind and previous issues across the Country and in some areas of Buckinghamshire should there be a definitive statement on Fracking in Bucks and reference to a Policy?</p> <p>Section 5 Para 5.4 – is “via incineration without energy recovery” correct bearing in mind EfW at Calvert now operating?</p> <p>Para 5.8 – is there a need for a reference here to National targets - to achieve 50% recycling by 2020 & the Bucks waste partnerships aim of 60% recycling by 2020. These aims are going to be difficult to meet</p>	<p>See comment above about Hydellane Farm. Also see the Briefing Note on Minerals Provision that accompanied the Preferred Options MWLP. Paragraph 4.54 actually makes reference to “the northern half of the county, notably at Aylesbury but also at Buckingham”.</p> <p>The purpose of the policy is not to address individual sites but to provide development principles applicable to the specific forms of development. Site specific matters are to be addressed through the planning application process. There is no local evidence to suggest that this is required.</p> <p>Care should be taken when reading the plan – para 5.4 states “The majority of which was recycled, composted or treated via other recovery methods with the remainder disposed of to landfill or via incineration without energy recovery.” Recovery referring to the EfW, which is classed as a recovery facility. Incineration without energy recovery is disposal and is often undertaken for clinical and other wastes, that make up a small amount of the total arisings. Yes, as it forms part of the planning context. Again, the scope of the MWLP is wider than just municipal waste.</p>
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	<p>without investment to improving recycling or diversion of bio waste. Noting the London situation surely the priority for the Plan should be considerations of working with the District Councils to minimise the effect on the districts waste services before the concern on London's needs.</p> <p>Para 5.14 – It is our understanding that the Package has yet to be adopted by the EU. If the UK does adopt it then there needs to be a clear plan in place to achieve these targets. Our view is that there is not a current plan.</p> <p>Para 5.16 – is the figure of only 5% going to landfill a realistic prospect bearing in mind general concerns over the ability of authorities across the Country achieving recycling etc. targets?</p> <p>Para 5.18 – It should be noted that AVDC provide commercial collections – roughly 4,000 tpa currently.</p> <p>Para 5.19 - What consideration is made if this very aspirational target is not met. How will the shortfall be managed?</p> <p>Para 5.27 Table 4 – Waste arisings – on what basis are these figures calculated?</p> <p>Para 5.34 – it would be helpful to understand why significant increase in LLW and significant decrease in ILW – commercial changes?</p> <p>Para 5.47 – has the SWMP legislation been repealed – December 2013?</p> <p>Para 5.50 – Where proposals are made it is hoped BCC include discussions with the local authorities when considering locations, facilities and impacts on services. It would be interesting to state/identify how this could be done i.e. underground facilities provide bulking opportunities and reduce vehicle movements – perhaps as part of the Garden Town initiatives with a project promoted at Aylesbury. How ambitious innovative could BCC be?</p> <p>Para 5.56 – The consideration of waste collection depots in any spatial strategy, should not necessarily rely on just the location in the main towns. This paragraph also highlights the need to include Amersham/Chesham in the spatial strategy.</p> <p>Para 5.57 – the statements here are generally supported but many acknowledge under current demands the existing facilities at both</p>	<p>The NPPW requires WPAs to address wider than local need. Relevant to Buckinghamshire as a WPA this relates to London's waste imports for disposal.</p> <p>The targets are aspirational, this is acknowledged through the WNA and the plan.</p> <p>It is not known where the figure of 5% has come from as referenced in the response. Para 5.16 states “This level of recovery may act to further decrease disposal to landfill to below the target of 10%.” Commercial collection undertaken by district and boroughs is normally captured under LACW (municipal) reporting. The plans policies and external market/legislative forces will act to facilitate delivery of increased recycling and recovery capacity. This is already apparent in the move away from landfilling. The plan includes a monitoring framework and trigger points for mitigation/correction.</p> <p>Refer to the WNA and addendum report.</p> <p>Refer to the WNA and addendum report.</p> <p>Refer footnote 23, page 48. This would be done as part of the planning application consultation process. Appropriate design/facilities would be determined on a site-by-site basis.</p> <p>Matter addressed earlier in Planning Authority comments.</p>
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	<p>Rabans Lane Aylesbury and at Buckingham are struggling to cope. Policy 11 – need to reference Amersham/Chesham, as well as the usual named settlements, as potential locations in the spatial strategy. There should be greater cross referencing to the current VALP as significant growth in our District is also proposed at the edge of Milton Keynes and the MoD site at Halton near Wendover.</p> <p>Para 5.65 – while perhaps not totally relevant to the content of M&WLP this will potentially have significant implications for District authorities. For example how will the desire for net self sufficiency be reflected in the procurement strategy. There will need to be considerable weighting to facilities located within County boundaries. If tenders are secured outside of District boundaries how will this be compensated to Districts?</p> <p>Para 5.68 - is this figure inclusive of LACW that is currently transferred and handled outside of local boundary e.g. AVDC transporting dry recycling to Wales?</p> <p>Para 5.70 - It is surely in the interest of BCC to encourage recycling and support Districts to improve collection rates for recycling.</p> <p>Table 7 – first line – are the figures accurate given that municipal recycling is not managed inside our boundary currently.</p> <p>Para 5.82 – would help if these totals were defined to help understanding.</p> <p>Table 8 & 9 & paras 5.87 – 5.89 – in this section it is unclear as to what the evidence base is for many of the suggestions relating to waste processing facilities, particularly the MRF's. Currently as the waste disposal authority BCC do not have responsibility for managing the recycling waste collected by WCA's – the Districts do, so not to sure of the justifications for these paragraphs. Moreover, as stated above, a blanket approach to industrial areas for the location of such facilities could lead to the loss of significant employment areas undermining local plan strategy and/or the economic strategies of Councils.</p> <p>With regard to the site specific plans:- the majority of the Buckingham Tingewick Road employment area has permission for housing; similarly</p>	<p>This paragraph acknowledges that there may be a need for some HRCs to consider capacity needs during the plan period.</p> <p>The Briefing Note on the Spatial Strategy for Waste explains the situation in respect of Amersham/Chesham (paras 17 and 18), Milton Keynes (para 22). RAF Halton was assessed for identification as a location where waste development would be acceptable (see Technical Appendix accompanying the Preferred Options MWLP) but was not taken forward due to an understanding that the Green Belt review for Aylesbury Vale was being put on hold.</p> <p>The plan seeks to achieve net self-sufficiency this does not preclude waste imports and exports. This is clearly recognised in the plan. This approach is in line with the NPPW.</p> <p>The figures provide a view of capacity needed to deliver net self-sufficiency – however import/export of wastes will continue, this is acknowledged through the plan. Refer to the NPPW, WNA and addendum report. Recycling is encouraged, refer to targets and indicative future capacity needs.</p> <p>The figures provide a view of capacity needed to deliver net self-sufficiency. Refer to the WNA and addendum report, also preceding sections regarding arisings and indicative future capacity needs.</p> <p>Refer to the Briefing Note on the Waste Spatial Strategy. Buckinghamshire are the WPA and as such are responsible for the management and control of waste development, including determining planning applications. As stated above Table 8 of the Draft Plan gives the broad indicative number of waste facilities required to meet the capacity gap identified. Bearing in mind how many locations have been identified in Table 9, plus that some can still come forward outside of these</p>
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	<p>some of the sites identified at Aylesbury will have potential conflicting uses, including housing permissions or in the case of the former Sony site at Rabans Lane allocated for 200 houses in the VALP; the inclusion of the Woodlands are east of Aylesbury also presents concerns in terms of a significant part of the employment area has Enterprise Zone status. A blanket inclusion of the urban areas major employment sites is not helpful for the identification of where such sites could be sited.</p> <p>Table 9 - Stocklake industrial area - is this reopening consideration of the Council's depot although it is not identified in the M&WLP as a facility with existing waste management use.</p> <p>As an overall comment of site search/selection, BCC is a significant land owner across the County. There does not seem to be any reference to this as a factor in the considerations of the location for waste facilities or requirements. Has BCC land ownership been considered as a parameter of search in Section 5?</p> <p>5.99 – The statement here would link well with food waste digesters in new homes. Bearing in mind the comments made previously on para 5.50 and innovation etc. do we need to better explore the link between food waste and AD. It would enable energy production without the need to transport waste – again perhaps badged under the Garden Town initiative.</p> <p>Para 7.4 – not too sure the statement “ no longer dirty operations” could relate to all waste treatment processes(!).There have been teething problems we understand with the new AD unit at Arla.</p> <p>Para 7.22 – such agreements or contract changes need to consider all partners including District Councils.</p>	<p>areas, then it is likely there will be a limited number of facilities (probably one at most) coming forward at each location over the whole of the plan period, although this is dependent on the market and how developers/operators take advantage of opportunities. It should also be noted that a waste management use is a job creating use of an industrial in nature that is appropriate to site on a general industrial estate. It is accepted that the map of Tingewick Road employment area was incorrect; the area developed for housing is not part of the area referenced in Table 9.</p> <p>This will be corrected.</p> <p>Sites have to first be put forward by landowners (including BCC) for consideration and assessment- there is no consideration as potential allocations for sites that have not been put forward through the issues and options or preferred options consultation stages. Incorporating waste design elements into new development is addressed in policy 10.</p> <p>This is a general statement and does not relate to individual sites.</p> <p>Inclusion of such measures would be addressed on a site-by-site basis and assessed through the development application process.</p>
Chiltern and South Bucks District Councils	<p>As referred to above, it is widely acknowledged by both District and County Councils that existing HGV movements through South Buckinghamshire, particularly in the Iver area cause adverse impacts to both the environment and to residential amenity. Core Policy 16 of the adopted South Bucks District Core Strategy identifies the south of Iver as an opportunity area and seeks a reduction in HGV movements through the redevelopment of Court Lane, Thorney Business Park and the Ridgeway Trading Estate. This position is also</p>	<p>The transport assessments required under Policy 18 will need to reflect how the proposal complies with adopted development plan policies in the area including Core Policy 16.</p>

	<p>reflected in the BCC adopted Minerals and Waste Core Strategy. Policy 17 of the draft MWLP seeks to minimise impacts on amenity and policy 18 requires proposals to submit a Transport Assessment. However, unlike the adopted MWCS, the draft MWLP does not actively seek a reduction in HGV movements. This should be amended to ensure that the existing impacts of HGV generating uses are reduced as part of a combined effort between the District and County Councils to address this issue and to improve the amenity of our residents. Although it is noted that some of the sites considered for minerals or waste developments would not increase vehicle movements and associated traffic impacts as they would simply offset existing vehicle movements, this does not contribute toward reducing the traffic and transport impacts in certain areas.</p> <p>Policy 3 of the draft MWLP refers to the potential to phase development to avoid cumulative impacts and to manage supply levels over the plan period. The phasing of sites for these reasons is supported, however the wording of the policy should be strengthened to ensure that sites will be phased unless there is a need for extraction to take place to avoid the minerals resource being sterilised by non-minerals development. Clarification should also be added to the policy to ensure that phasing is applied in the context of cumulative adverse impacts of wider developments such as major infrastructure projects and planned growth set out in local plans, and not just in relation to other minerals developments.</p> <p>The draft MWLP is accompanied by a Habitats Regulations Assessment (HRA) Screening document. Air quality impacts have been identified as a pressure for the Burnham Beeches Special Area of Conservation (SAC) as the Beech trees are particularly sensitive to atmospheric pollution. The HRA screening document concludes that the MWLP will not adversely impact on the SAC, although it does acknowledge that HGV movements associated with the Slade Farm site would require mitigation. Our Councils are currently working with BCC, Natural England and the City of London to ensure that impacts associated with the emerging joint Local Plan are adequately assessed and mitigated, in cumulation with other plans likely to affect the SAC. BCC must take a similar approach in considering the impacts of the MWLP not just in isolation, but in cumulation with other relevant plans and projects and therefore an Appropriate Assessment may be required.</p>	<p>The policy states that provision may be phased because depending on how allocations come forward to be granted permission and then implemented there may be no need to not grant permission at a particular allocation at a particular point in time because there is already enough operations within the primary area of focus to deliver the plan requirements.</p> <p>The MWLP and its proposals, including the proposed Slade Farm North and South allocations, have been screened as per regulations, including assessment of cumulative impacts. In combination effects were taken into consideration through the HRA, as were air emissions. The HRA has been carried out on a plan and not a detailed planning application. Nevertheless it is interesting to note that this issue of in combination effects does not appear to have been raised by statutory consultees in relation to the planning applications for Slade Farm or perhaps even more pertinently the application (since granted) relating to the A355 Beaconsfield Relief Road which will increase the attractiveness of the whole A355 as a movement</p>
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	<p>As referred to above, we are also concerned that appropriate restoration of allocated minerals extraction sites may not be possible due to decreasing availability of construction, demolition and excavation waste for use as fill materials. Policies relating to the restoration and aftercare of minerals and waste sites need to be strengthened to ensure that sites are restored in an appropriate and timely manner, at the earliest opportunity. In addition, we would strongly encourage BCC to work with affected communities, and where appropriate Neighbourhood Planning Groups, to ensure that restoration schemes bring beneficial uses to these communities. For example, within South Bucks District there are neighbourhood planning groups for Iver and Hedgerley.</p> <p>The draft MWLP requires the cooperation of District Councils as local planning authorities to implement policies relating to Minerals Safeguarding Areas and waste prevention and minimisation in new development (policies 1 and 10). We suggest that BCC works closely with district Development Management Officers in order to ensure that the processes proposed are appropriate such that the County's aspirations can be achieved without undue disruption or delay to the determination of planning applications by the Councils. In particular, the definition of major development should be considered as the current drafting would require a significant number of planning applications to submit additional information regarding waste generation which does not at present form part of the local validation requirements for planning applications.</p> <p>Policy 10 should also include an emphasis on the inclusion of accessible and appropriate storage and segregation facilities, including waste collection locations, to ensure that large refuse collection vehicles can</p>	<p>corridor. However under the explanatory text for Policy 18 on Sustainable Transport reference will be made to Burnham Beeches and the A355 and that transport movements associated with minerals and waste development should avoid using this route.</p> <p><u>7.24 ... Of particular note, Burnham Beeches SAC is located within the south of the county, with the A355 running in a north-south direction to the east. In order to avoid having a significant effect on the interest features of the SAC, transport movements associated with minerals and waste development should avoid using this route.</u></p> <p>Restoration schemes are a detailed matter to be addressed through the planning application process. Policy 26 covers the delivery of high quality restoration and aftercare, and states that after-use of a site will be determined in relation to the land-use context, Policy 29 on Implementation promotes the establishment of Local Liaison Groups.</p> <p>Yes, this is as per the current adopted plan and national policy and guidance. Such co-operation is expected to continue.</p> <p>The provisions set out through Policy 1 are in line with national policy and guidance.</p> <p>Policy 10 – this matter is captured under “Design and layout that complements sustainable waste management by providing appropriate storage and segregation</p>
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	<p>safely access storage and collection points. In consideration of the rationalisation of HRCs, particular note should be taken of the important role that these play in reducing incidents of fly-tipping.</p> <p>The Councils would like to see the MWLP take a more plan-led approach to guiding development towards the most sustainable locations within the local context. Although the impacts of minerals and waste developments in isolation may not appear significant, they must be considered within the context of wider development pressures and major infrastructure projects and the cumulative impacts of these adequately assessed, particularly in relation to transport and amenity. Parts of our districts are facing significant pressures from major infrastructure projects and other forms of development, and as such may not be the most sustainable locations for minerals and waste development at this time.</p>	<p>facilities”. Draft Plan para 5.57 acknowledges that there may be a need for some HRCs to consider capacity needs during the plan period. If there are any service reviews during the plan period these comments will be considered at that time.</p> <p>The level of minerals development proposed by the MWLP in southern Buckinghamshire is no different in scale from what has previously been undertaken in the area. It would appear from the last sentence of this particular representation that if an area is facing significant pressures from major infrastructure projects and other forms of development then, contrary to what is suggested, the area actually becomes very much a sustainable location for minerals and waste development as it supports the other development in its vicinity.</p>
Wycombe District Council	<p><i>Little Marlow Lakes country park</i></p> <p>Map 5 in the document does not show the former Little Marlow gravel pits – now Little Marlow lakes – as a country park. Our Cabinet decided on 18 September 2017 to designate Little Marlow lakes under the Countryside Act 1967. More generally we would also refer you to our emerging Local Plan proposals which will see the area developed as a country park, and before this the Little Marlow gravel pits supplementary planning document, which set out our ambitions for the development of the site. We would appreciate it if you could please update your diagrams to reflect the designation, and if you could also update your draft policies where necessary.</p> <p><i>General errata</i></p> <p>We have noted some errors in the later parts of the document – on page 113, Saunderton is referred to as “Saunderstown”, while on page 115 Cressex is rendered as “Cresses”.</p>	<p>The Draft Plan was published in August 2017, before the designation was made in September 2017. Relevant elements of the plan will be updated accordingly.</p> <p>Noted. These typographical errors will be corrected for the Proposed Submission document.</p>
Central and Eastern Berkshire Authorities	<p>The Central & Eastern Berkshire Authorities welcome the recognition within the Buckingham Context (Para. 2.13) that the Plan Area has a strong relationship with the Thames Valley area and the pressures on land within this location.</p> <p>There is reference to waste material being imported into Buckinghamshire from Windsor & Maidenhead and from Reading but that that also waste material is exported to Reading (Para. 2.23-24). The Environment Agency’s Waste Data Interrogator (2015) supports the description that the majority of household, industrial and commercial</p>	<p>Noted.</p> <p>Noted.</p>

	<p>(HIC) waste, which forms the largest movements from Central & Eastern Berkshire to Buckingham, does originate from Reading and Windsor & Maidenhead. However, the data suggests that the most significant movements of waste, from Buckinghamshire to Central & Eastern Berkshire, are of inert waste to Windsor & Maidenhead.</p> <p>Central & Eastern Berkshire is currently sending a significant amount of HIC waste to Gerrards Cross Landfill which is due close at the end of 2017. There is reference to the fact there is remaining capacity to meet Buckingham's landfill need and potentially the required amount of need from London. Landfill demand and future capacity is an issue recognised by the South East Waste Planning Advisory Group and is the subject of a proposed Memorandum of Understanding (MoU). It would be beneficial to all parties if there was input into the MoU, most importantly for those preparing Waste Local Plans such as Buckinghamshire, Central & Eastern Berkshire and Surrey.</p> <p>The waste management methodologies have been reviewed and the Central & Eastern Berkshire Authorities have no comment at this time. The Central & Eastern Berkshire Authorities welcome continued dialogue as part of the Duty to Cooperate and would particularly welcome discussions regarding proposals which may have cross-boundary impacts.</p>	<p>Please refer to Planning Authority Response relating to the Hampshire County Council comments.</p> <p>The County Council is, through the South East Waste Planning Advisory Group, contributing to the preparation of a SoCG on this matter.</p>
<p>City of London Corporation (Burnham Beeches)</p>	<p>My comment relates to the Habitats Regulations Assessment screening for the Minerals and Waste Plan. I write on behalf of the City of London Corporation, owners and managers of Burnham Beeches SAC. I note that the conclusions of the HRA screening document include that there is no likely impacts on Burnham Beeches SAC. I would like to point out that on page 9 of the assessment there are slight increases in traffic expected as a result of working of the Slade Farm site. Although these appear very small it is our opinion that they need to be considered in combination with other plans and projects in the area that will also have an impact on traffic on the A355 because of the potential negative impact on air quality in relation to the SAC. We have been working closely with the BCC Ecology adviser over this and similar issues and I'm sure she will be able to provide more information and advice.</p>	<p>In combination effects were taken into consideration through the HRA, as were air emissions. The HRA has been carried out on a plan and not a detailed planning application. Nevertheless it is interesting to note that this issue of in combination effects does not appear to have been raised by statutory consultees in relation to the planning applications for Slade Farm or perhaps even more pertinently the application (since granted) relating to the A355 Beaconsfield Relief Road which will increase the attractiveness of the whole A355 as a movement corridor. However under the explanatory text for Policy 18 on Sustainable Transport reference will be made to Burnham Beeches and the A355 and that transport movements associated with minerals and waste development should avoid using this route.</p> <p><u>7.24 Of particular note, Burnham Beeches SAC is located within the south of the county, with the A355 running in a north-south direction to the east. In order to</u></p>

		avoid having a significant effect on the interest features of the SAC, transport movements associated with minerals and waste development should avoid using this route.
Hampshire County Council	<p>There is reference to waste material being imported into Buckinghamshire from Hampshire but that also waste material is exported to Hampshire (Para. 2.23-24). The Environment Agency's Waste Data Interrogator (2015) supports the description that the majority of these movements are household, industrial and commercial (HIC) waste. The data suggests that the most significant movements of waste, from Buckinghamshire to Hampshire, are in the order of 21,000 tonnes of HIC waste to Laverstoke composting facility.</p> <p>Hampshire currently sends a significant amount of HIC waste to Gerrards Cross Landfill. There is reference to the fact there is remaining capacity to meet Buckingham's landfill need and potentially the required amount of need from London. Landfill demand and future capacity is an issue recognised by the South East Waste Planning Advisory Group and is the subject of a proposed Statement of Common Ground (SoCG). It would be beneficial to all parties if there was input into the SoCG, most importantly for those preparing Waste Local Plans such as Buckinghamshire.</p> <p>The waste management methodologies have been reviewed and Hampshire County Council has no comment at this time.</p> <p>Hampshire County Council welcomes continued dialogue as part of the Duty to Cooperate.</p>	<p>Noted.</p> <p>The County Council is, through the South East Waste Planning Advisory Group, contributing to the preparation of a SoCG on this matter.</p>
Hertfordshire County Council	<p>HCC questions BCC'S statement in paragraph 4.60 that there are no national requirements to maintain a specific level of provision for clay, referencing paragraph 146 of the National Planning Policy Framework (NPPF) which states "mineral planning authorities should plan for a steady and adequate supply of industrial minerals by [...] providing a stock of permitted reserves [for] at least 25 years for brick clay."</p> <p>The NPPF also states that mineral planning authorities should consider "the need for provision of brick clay from a number of different sources to enable appropriate blends to be made."</p>	<p>Brick clay extraction occurs on a very small scale with only one operator (who also manufactures bricks), as such including detailed data is not possible. It should be noted that HG Matthews, operators of the brickclay extraction and manufacturers of traditional bricks, support the MWLP policies.</p> <p>In addition through Policy 1, the MSA identifies brick clay for safeguarding. Para 4.60 (now 4.63) will be amended for clarity.</p> <p>4.63 There is no national requirement to maintain a specific level of provision for clay or chalk. Hence, whilst the Plan will continue to support the principle of maintaining a suitable supply of material to sustain the Chilterns brick industry, the identification of a stock of permitted reserves and the identification of locations for</p>

	<p>As discussed during the Duty to Cooperate (DtC) meeting, held between HCC and BCC on the 1st November 2016, HCC is currently reviewing its Minerals Local Plan, and introducing a new policy specifically addressing Brick Clay extraction. Due to the nature of local clay reserves, it is possible that Bovington Brickworks in Hertfordshire may need to be supplied by sites from further afield, including sites nearby in Buckinghamshire, or brickworks operating in adjoining authorities may need to be supplied by extraction sites in Hertfordshire. In instances where the county council receives an application for clay extraction to supply out-of-county brickworks, it is the county council's intention that they will liaise with the neighbouring minerals planning authority to determine the specified brickworks' existing stock of permitted reserves as well as determining whether the proposed extraction operations are in accordance with the policies in the Development Plan for Hertfordshire. The wording of HCC's Brick Clay policy was agreed upon by both county councils during the DtC meeting (01/11/16) and subsequent email correspondence, along with the recognition that border-neutral Brick Clay markets means cross-boundary movement is likely. As agreed upon during the DtC meeting, HCC would like BCC to support Hertfordshire's Brick Clay industry through policy, as HCC is proposing to support Buckinghamshire's. The inclusion of a specific clay provision policy within Buckinghamshire's Mineral and Waste Local Plan, should address both cross boundary reserve issues and the expectation to consult, as well as resource extraction for out-of-county brickworks. The county council is keen for consultation to continue in the future and would be happy for further discussions to take place around the points raised during this consultation.</p>	<p>the winning and working of these resources is not considered <u>necessary given the nature and limited scale of operations</u>. At the DtC meeting BCC agreed that there was no issue in making reference in the new MWLP to the need to serve demand from beyond the plan area for clay for the production of Chiltern bricks. This is taken forward in (a) Policy 2 second criterion where the production of Chiltern bricks to promote local identity in the "wider Chiltern area"- this is taken to include the Chilterns including Hertfordshire; and (b) Policy 5 which supports the proposals to maintain a supply of material to meet the local and wider demand for Chiltern bricks- this is taken to include Hertfordshire both in and outside of the Chilterns AONB.</p>
North London Waste Plan Authorities	<p>We welcome the Draft Plan's acknowledgement of the relationship between London and Buckinghamshire and that waste flows from London will continue. We also welcome the Plan's intention to accommodate a declining quantity of London's waste for disposal to landfill, in line with London Plan targets to manage more of its own waste. However, it should be noted that London's targets for net self-sufficiency does not mean that waste exports from London will stop altogether after 2026, particularly for CD&E waste. London has few landfill sites of its own and will continue to rely on landfills in the greater South East, including in</p>	<p>The waste referred to as "non-hazardous" imports from London for disposal and as non-apportioned waste in the London plan is municipal and C&I. The likelihood of ongoing imports for disposal is acknowledged in para 5.75. A portion of CD&E waste is included in the CD&E arisings, refer to the WNA. <u>The MWLP and WNA will be amended to clarify this.</u></p>

	<p>Buckinghamshire. In this respect, 'net self-sufficiency' means that London will need to import waste to be recycled and treated and will continue to export (mainly inert) waste to landfill.</p> <p>In light of the above, it may be useful to provide additional monitoring for Policy 13: Disposal to Landfill in the form of waste flows to landfill from London. This will show if waste from London is reducing at the rate expected and planned for.</p> <p>The London Plan is currently being reviewed, with a new draft plan due for consultation in November 2017. It is hoped that the new London Plan will contain better information about anticipated waste exports to enable waste planning authorities in the wider South East to understand future waste flows. I also draw your attention to the GLA's three reports (undertaken by SLR) to support the London Plan review, including waste movements, HH and C&I waste forecasts and CD&E and hazardous waste forecasts. While the reports don't mention individual recipient authorities, they provide some high-level figures which may be of interest.</p>	<p>Agreed, the monitoring framework will be amended to include imports to landfill received by Buckinghamshire from London waste authorities.</p> <p>Noted.</p>
Oxfordshire County Council	<p><i>Waste Needs Assessment Addendum</i></p> <p>Paragraph 1.9 We support the intention of the Minerals and Waste Local Plan to be net self-sufficient in waste management capacity.</p> <p>Paragraph 1.34 We note that the Waste Needs Assessment includes justification for no growth in CDE arisings over the plan period as being the fact that nationally, construction arisings have remained relatively constant since 2004. In addition, the Planning Practice Guidance for Waste (paragraph 033 Reference ID: 28-033-20141016) states that: 'Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based for construction and demolition wastes...' <u>Waste Needs Assessment</u> Commercial and Industrial Baseline Estimate Three methods for calculating the C&I baseline are given on page 7. It appears from the following paragraph that the approach chosen was to estimate the quantity of C&I waste by using the business profile in Buckinghamshire and applying waste production factors related to different business profiles. However, the actual approach taken does not appear to be this approach, or any one of the initial three methods outlined, instead using the Waste Data Interrogator to estimate C&I</p>	<p>Noted.</p> <p>Noted.</p> <p>The approach applied in the WNA was a blend of the approaches identified in order to take account of the most recent data available through the EA WDI – the WNA will be amended to clarify this.</p>

	<p>waste based on European waste classifications. It is questioned that assuming C&I waste is total waste minus Mining Waste, Agricultural Wastes, CDE waste and municipal waste means that some hazardous waste may still be included in the estimate for C&I waste.</p> <p>Construction, Demolition and Excavation Baseline Estimate</p> <p>There is some concern that the methods for estimating CDE and C&I waste from the WDI includes double counting. This is because in the C&I estimate, CDE waste is assumed to include all Chapter 17 wastes, and is on this basis excluded from the C&I estimate. The C&I estimate goes on to exclude Mining waste (Chapter 1), Agricultural wastes (Chapter 2) and Municipal wastes (part of Chapter 20) from total waste arising in Buckinghamshire, to assume that the remainder is C&I waste. However, the estimate for CDE waste includes some chapter 21, 22, 24, and 26 wastes which in theory were also included in the C&I estimate. Therefore there is some waste which appears to be both included in the CDE and C&I estimate. There is not a breakdown of the Chapter 21, 22, 24 and 26 waste included in the CDE estimate, so it is not known what magnitude the nature of double counting may be.</p> <p>It is questioned why the figure for London's CDE waste that is managed in Buckinghamshire is included in the baseline estimate of CDE waste. If the plan is aiming to be net self-sufficient for Buckinghamshire's waste, including aspects of London's inert waste will mean there could be an overestimate of the capacity required for inert waste facilities in Buckinghamshire in order to be net self-sufficient. It is also contrary to paragraph 5.22 in the draft plan, that 'approximately 1.13Mt of CD&E waste was produced within Buckinghamshire', as 318,130 tonnes of that amount arose in London.</p> <p>Targets</p> <p>Another option for recycling targets for municipal waste are those currently in the Waste Framework Directive of 50% by 2020.</p>	<p>The WNA will be amended to clarify this.</p> <p>The NPPW S3 requires WPAs to consider the need for additional waste management capacity of more than local significance.</p> <p>The plan and WNA will be amended to clarify how London's waste is accounted for with respect to CD&E arisings.</p> <p>Noted. The MWLP takes account of the JWS targets.</p>
Royal Borough of Kensington and Chelsea	<p>In May 2017 RBKC responded to a waste movements consultation administered by Northampton County Council on behalf of Buckinghamshire County Council. The response provided the waste movements data between the two authority areas.</p> <p>Since the above response, the Council has undertaken engagement on waste movements jointly with the WRWA WPAs, which included writing to Buckinghamshire County Council. This set out the waste movements between each of this Borough, and the other WRWA WPAs, and Buckinghamshire. Buckinghamshire County Council did not respond to</p>	<p>There is no record of having received this consultation. Nevertheless the Council agrees with the assumption made.</p>

	<p>the engagement letter, therefore it is understood that the waste movements are not considered to be strategic by BCC and are able to continue in the future. This is reflected at paragraph 5.42 of the Buckinghamshire MWLP “movements are likely to be subject to commercial contracts and operational (network) arrangements and so are anticipated to continue in a similar vein, albeit with a gradual decline in line with the London Plan.”</p> <p>The Council note that the MWLP reflects the London Plans intent to be self-sufficient by 2026, this is clearly seen in Table 5 where London exports drop to 0 tpa. Whilst London boroughs are working hard towards managing as much of London’s waste within London as practicable there are significant challenges in doing so. Buckinghamshire CC should monitor the London position during its plan period and ensure suitable flexibility should net self-sufficiency not be achieved by 2026.</p> <p>The Council has no further comments to make to the Buckinghamshire Minerals and Waste Local Plan.</p>	<p>Noted. This is reflected through the monitoring framework.</p>
<p>Slough Borough Council</p>	<p>Please accept this as confirmation that Slough Borough Council are aware of the consultation and would request the opportunity to put in a late submission.</p> <p>This is in order to duly respond and support the plan production in light of the duty to cooperate; that the Authority has minerals workings adjacent to Slough serviced by access roads through the Borough; that Slough recently released report on a possible Urban expansion in the area north of Langley to Wexham, that the Colne Valley Park remains a priority; that the Borough’s waste facility and rail sidings in Colnbrook will be affected if expansion at Heathrow goes ahead, and that the Borough in its own right is not anticipating producing a minerals plan at this stage as its preferred areas are considered unlikely to be viable to develop, with one being dependent on access through South Bucks.</p>	<p>Slough BC did not ultimately make a submission. However in relation to the matters raised in their request to make a late submission:</p> <ul style="list-style-type: none"> - The majority of the North Park, Richings Park allocation now has planning permission with traffic being routed via Sutton Lane in Slough Borough, which is a good quality road with limited access frontages. The remainder of the site would come forward following extraction from the permitted area and would not thus put any additional burden on Sutton Lane. - The possible urban extension is not relevant to the MWLP. However even if long term development proposals in part or all of this area were to ultimately be supported by the relevant Buckinghamshire local planning authority then these proposals will have to acknowledge what is allocated or committed in this area in relation to minerals and waste development and work around such development. - Policy 25 of the MWLP on Environmental Enhancement references the Colne Valley Regional Park and that the North Park, Richings Park site falls within the park boundaries.

		<ul style="list-style-type: none"> - The potential impact of Heathrow expansion on the waste facility and rail sidings at Colnbrook is noted by the County Council. - It is noted by the County Council that Slough BC has chosen not to join with the other central and east Berkshire authorities in preparing a plan dealing with minerals matters (and also waste).
West Berkshire Council	<p>West Berkshire Council generally supports the principles of the minerals and waste policies in the Buckinghamshire Preferred Options Local Plan, in particular the ambition in Policy 12 to provide for net self-sufficiency in waste terms over the plan period, as well as the continued safeguarding of minerals resources in Policy 1.</p> <p>There are typographical errors in paragraphs 4.32, 4.73 and 5.1 West Berkshire Council welcomes the efforts that have been put into meeting the Duty to Co-operate to date and would welcome further and ongoing discussions on both Councils' respective emerging Local Plans.</p>	<p>Noted.</p> <p>Typographical errors will be amended.</p>
Anglian Water	<p><i>Policy 15: Development Principles for Waste Management Facilities</i></p> <p>Policy 15 is intended to set out the criteria for the circumstances in which waste management facilities would be supported.</p> <p>It is assumed that it is intended to relate to waste management facilities more generally and not the development of new or existing sewage treatment works. For example the existing water recycling centres (formerly sewage treatment works) require access to a suitable watercourse to allow the discharge of treated water and are not limited to those areas identified as a focus for additional waste management.</p> <p>Policy 15 should be amended to make it clear that development of new and existing sewage treatment works would be considered in the context Policy 16 (Sewage Treatment Works) and other relevant local plan policies.</p> <p>It is therefore suggested that the first sentence of Policy 15 should be amended as follows:</p> <p>'Proposals for waste management facilities (<i>excluding sewage treatment works</i>) must demonstrate that the development:'</p> <p><i>Policy 16: Sewage Treatment Works</i></p> <p>Anglian Water has a statutory obligation to provide sufficient sewage treatment capacity so that we can continue to serve the needs of our existing or new customers. Where an upgrade or improvements are required at an existing water recycling centre (formerly sewage treatment works) it is identified and funded through our business planning process.</p>	<p>The plan includes a separate policy setting out development principles for STWs (Policy 16) as such this is assumed. For clarity the end of para 5.95 is to be amended to include a footnote (after "new sites.") to read "Planning applications for such development are to be determined against Policy 16 and other relevant MWLP policies."</p> <p>The need for additional capacity is currently addressed through policy 16, however the policy could be amended to capture supporting infrastructure, as follows:</p> <p>"Proposals for extensions to, or increased capacity of, existing sewage treatment works (STWs), new STWs,</p>

	<p>It is considered that Policy 16 as currently drafted is not sufficiently positive in enabling the continued operation and development of existing water recycling centres to enable Anglian Water to fulfil our statutory obligations under the Water Industry Act 1991.</p> <p>For example there may be a need to make changes to the existing processes on site for operational reasons, to provide additional sewage treatment capacity or supporting infrastructure e.g. renewables.</p> <p>Therefore it is considered that Policy 16 should be amended to supportive of proposals at existing sewage treatment works where it is required for the above reasons.</p> <p>It is therefore suggested that Policy 16 should be amended as follows: 'Proposals relating to the role, function and operation of existing sewage treatment works including the provision of additional sewage treatment capacity and/or supporting infrastructure will be supported where compliant with relevant MWLP policies'.</p> <p>Proposals for extensions to existing sewage treatment works (STWs), new STWs, or for the co-location of STWs with other waste management facilities will be supported where it can be demonstrated that there is a need for increased capacity to support sustainable development, operations do not have unacceptable adverse impacts, the scale of the development reflects the role of the location with respect to the settlement hierarchy and the proposal complies with relevant MWLP policies.'</p> <p><i>Policy 27: Minimising Land Use Conflict</i></p> <p>Anglian Water is generally supportive of Policy 27 as drafted. However the final paragraph of the policy needs to clarify what mitigation being referred to in this context. For example it is unlikely to be able to mitigate odour impact from existing sewage treatment works particularly where residential development is proposed.</p>	<p><u>supporting infrastructure (including renewable energy) or for the co-location of STWs with other waste management facilities will be supported where it can be demonstrated that there is a need for increased capacity to support sustainable development, operations do not have unacceptable adverse impacts, the scale of the development reflects the role of the location with respect to the settlement hierarchy and the proposal complies with relevant MWLP and development plan policies."</u></p> <p>It is Policy 28 that addresses minimising land use conflict. Mitigation measures would be determined on a site-by-site basis as appropriate through the planning application process.</p>
Berks, Bucks & Oxon Wildlife Trust	<p>We welcome the text provided in Policies 19, 24, 25 and 26 and the accompanying text.</p> <p>There are a few areas where we do not consider that our response to the consultation in 2015 has been fully addressed and that the following amendments need to be made to the Local Plan. We repeat below the text from our 2015 response which we do not consider to have been fully addressed. We accept and welcome that some aspects of the Biodiversity-led restoration policy section below have been addressed however we do not consider that there is sufficient content at present to fully address the aims or requirements of the below quoted documents.</p>	

	<p><i>Biodiversity-led restoration policy</i></p> <p>We would strongly support a biodiversity-led restoration policy with an objective as follows:</p> <p>“Restored mineral workings will enhance the quality of Buckinghamshire’s natural environment and the quality of life for Buckinghamshire residents by delivering a net-gain in biodiversity through a biodiversity-led restoration strategy - making a significant contribution to establishing a coherent and resilient ecological network - through the creation of priority habitats at a landscape scale.”</p> <p>With appropriate restoration and after-use minerals extraction presents a unique opportunity for the landscape-scale restoration of natural habitats. This wording reflects:</p> <ol style="list-style-type: none"> 1. The NPPF, which requires the planning system to: <ul style="list-style-type: none"> <input type="checkbox"/> establish coherent ecological networks that are more resilient to current and future pressures (para. 109); <input type="checkbox"/> provide net-gains in biodiversity (paras. 9 and 109); <input type="checkbox"/> plan positively for the creation, protection, enhancement and management of networks of biodiversity (para. 114) <input type="checkbox"/> plan for biodiversity at a landscape-scale across local authority boundaries (para. 117); <input type="checkbox"/> identify and map components of the local ecological network (para. 117). 2. The Natural Environment White Paper which states in paragraph 5 of the Executive Summary: <p>“Past action has often taken place on too small a scale. We want to promote an ambitious, integrated approach, creating a resilient ecological network across England. We will move from net biodiversity loss to net gain, by supporting healthy, well-functioning ecosystems and coherent ecological networks.”</p> 3. Biodiversity 2020 (DEFRA 2011) which set out a mission ‘to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people’. 4. The Lawton Review (Defra (2010) Making Space for Nature: a review of England’s wildlife sites and ecological network.) which stated that ‘we need a step-change in our approach to wildlife conservation, from trying to hang on to what we have, to one of large-scale habitat restoration and recreation, under-pinned by the re-establishment of ecological processes and ecosystem services, for the benefits of both people and wildlife’; 	<p>Whilst the importance of biodiversity is acknowledged the restoration and after care of sites should have a wider scope to ensure that it takes account of local context and the sites particular circumstance/ opportunities; hence policy 26 strikes a more balanced approach. Policy 26 adequately addresses biodiversity gains; this is reinforced through Policy 19 and 25.</p>
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	<p>A biodiversity-led restoration strategy is being pursued by Nottinghamshire County Council in their draft Minerals Local Plan – draft Policy SP2 with justification as follows:</p> <p>“Once minerals extraction sites have fulfilled their primary purpose of providing minerals, the restoration of such sites can have a major environmental benefit; there is considerable potential in linking existing areas of habitat as well as creating new areas of habitat for wildlife, and in doing so, to help meet national and local habitat creation targets.....</p> <p>Whilst a certain level of new habitat has been delivered in Nottinghamshire as a result of the restoration of permitted minerals extraction sites, opportunities have in the past been lost. With a suitable policy framework, and careful planning at an early stage, the level of high-quality habitat delivered by mineral extraction can be increased, creating valuable places for both wildlife and people.”</p> <p><i>A biodiversity-led restoration strategy should include the following:</i></p> <p><i>(i) treat biodiversity as the primary consideration in the restoration of mineral sites;</i></p> <p><i>(ii) give preference to allocating and / or permitting mineral development in areas where it will have the greatest potential to maximise biodiversity benefits (i.e. within the Biodiversity Opportunity Areas);</i></p> <p><i>(iii) create priority habitat at a landscape scale, either on individual sites or on clusters of sites in close proximity;</i></p> <p><i>(iv) integrate habitat creation on restored mineral sites into the existing ecological network in the surrounding area;</i></p> <p><i>(v) set targets for the area of priority habitat that will be created on allocated sites (assuming sites are allocated in later stages of the Plan). and should be incorporated into any replacement policies on Restoration and Aftercare.</i></p> <p>Other examples of landscape-scale biodiversity-led restoration from other counties include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The draft Worcestershire Minerals Local Plan is incorporating the potential to deliver strategic restoration benefits, including landscape-scale habitat creation, into its criteria for identifying Areas of Search. <input type="checkbox"/> The draft Essex Replacement Minerals Local Plan has set targets for the area of priority habitat that will be created on allocated sites. <p>In relation to the allocation of sites, then it is important to consider opportunities for large-scale strategic habitat creation. The draft Worcestershire Minerals Local Plan identifies 200ha as the minimum area required to deliver strategic restoration benefits, including</p>	
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	<p>landscape-scale habitat creation. More generally, the Lawton Review regarded wildlife sites smaller than 100ha as being 'too small'. Whilst smaller areas are still vitally important, if sites in close proximity are all taken forward as biodiversity restorations then the benefits are greater.</p> <p><i>Length of time for aftercare</i></p> <p>The restoration and aftercare policy should also include reference to long-term aftercare, for example through a policy statement such as: "proposals for restoration, aftercare and after-use should...include provision for long-term maintenance of the after-use and enhancement of the environment". Many of the habitats that can be created through mineral restoration take many years to become well established, so provision for long term maintenance is essential to maximise the biodiversity potential of the site. In addition, many species require a period longer than 5 years to become successfully established. In Oxfordshire, 'the standard long-term management period is 20 years, in addition to the 5-years of statutory aftercare'. Buckinghamshire should strongly consider adopting a similar approach.</p>	<p>Para 7.88 acknowledges this and the policy includes provision for "ongoing management and monitoring where necessary".</p> <p>The appropriate timeframe for management is dependent on the after use and is to be determined on a site-by-site basis through the planning application process.</p>
<p>Chilterns Conservation Board</p>	<p>1) The Key Diagram is misleading – the position of the purple triangle fails to show that the main site for waste management at High Wycombe is in the Chilterns AONB.</p> <p>2) The Chilterns Conservation Board questions whether enough weight been given to the AONB. NPPW states that "Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations". As a nationally designated landscape why has the AONB not been explicitly avoided?</p> <p>3) It is not clear that the landscape capacity and visual sensitivity assessment undertaken as part of the Site Assessment Methodology has involved any fieldwork. A desktop assessment based on presence or absence of designations is not enough when making allocations, BCC needs to demonstrate its duty of regard towards conserving and enhancing the natural beauty of the AONB (CRoW Act 2000 sec 85). Assessments from qualified landscape professionals using nationally established methodology (Guidelines for Landscape and Visual Impact Assessment, 3rd edition, Landscape Institute). The setting of AONB also needs careful consideration, please see the Chilterns Conservation Board's Position Statement of Development Affecting the Setting of the Chilterns AONB.</p> <p>4) Please be aware of the importance of chalk streams as an</p>	<p>The purple triangles indicate the areas of focus not individual waste management sites.</p> <p>The NPPF and NPPW do not prohibit such development within the AONB. The AONB is addressed in Policy 23.</p> <p>Site visits were undertaken and site assessments undertaken as per the published method. Field surveys of such a detailed nature are not considered to be proportionate and would normally be undertaken as part of the planning application process.</p> <p>As per the Planning Authority response to the Chilterns Conservation Board, in order to provide consistency the term "setting" will be applied e.g. "within the Chilterns AONB and its setting / affecting the AONB and its setting".</p> <p>There are many important habitats within the county and</p>

	<p>internationally rare habitat. The plan fails to mention chalk streams. In Buckinghamshire these include the River Chess, River Misbourne, River Wye, Hughendon Stream and the Hambledon Brook. For instance, the River Chess at Chesham is a chalk stream which runs past an existing waste facility. How has the Site Assessment process factored in impact on AONB and its setting, and impact on chalk streams and chalk aquifers?</p> <p>5) The proposed waste spatial strategy should include reference to AONB as well as Green Belt: Policy 11. Add AONB as follows: Within rural areas, and where not inappropriate within the green belt and AONB, the development of facilities that incorporate the biological treatment of waste or that are incompatible with urban development will be supported and given priority where (i) associated with existing rural employment uses or farm-based enterprises, and/or (ii) involving the re-use of previously developed land, redundant agricultural and forestry buildings and their curtilages. Delete AONB as follows: Facilities for the preparation of wastes for re-use and recycling within or adjoining the Chilterns AONB will be supported where appropriate. Reasons: To comply with i) NPPW locational criteria (appendix B), ii) NPPF para 115 which states that great weight should be given to the AONB, and iii) BCC's duty towards the AONB under the Countryside and Rights of Way Act 2000 section 85. Biological treatment of waste could constitute major development in the AONB (to which para NPPF 116 applies) and a range of types of harm to the AONB could be involved: landscape and visual impact, noise, traffic generation, risk of nitrogen deposition, biodiversity impacts from attraction of insects, vermin and birds, air pollution and odours, effects on watercourses etc.</p> <p>6) Policies 2 and 5: Chilterns Conservation Board supports the encouragement of the Chiltern brick industry which is important for providing local materials for repair of historic buildings and construction of sympathetically designed new ones. Existing brickworks sites should be</p>	<p>specific reference cannot be made to each one, hence the policy refers to natural assets and resources, including protected and notable species (policy 19), in order to ensure that where such assets/resources occur they are given due consideration through the planning process and are identified at an early stage with respect to development proposals.</p> <p>The AONB has been addressed at an appropriate level through the site assessments, which included site visits. Field surveys of such a detailed nature are not considered to be proportionate and would normally be undertaken as part of the planning application process.</p> <p>Policy 11 refers to Green Belt in 4th para and AONB in 5th para. Refer to Policy 22 and 23 for more detail on minerals and waste development within the Green Belt and AONB.</p> <p>Policy 27 covers this matter.</p>
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	<p>safeguarded so that any that close could be reopened in future. Two of the three brickworks making Chilterns bricks have closed in recent years.</p> <p>7) Policy 9: Chilterns Conservation Board supports the approach to no oil and gas sites or equipment in the AONB, but the approach to sites under the AONB should be strengthened to also prohibit this, as harm to the chalk aquifer is likely.</p> <p>8) The Chilterns Conservation Board is concerned that several proposed allocations directly affect the Chilterns AONB, either by being within the AONB or in its setting:</p> <ul style="list-style-type: none"> • High Heavens (Great Marlow) - This site is in the AONB - why is this only yellow flagged in the site assessment? More weight should be given to conserving and enhancing the AONB, this is a nationally protected landscape. How will waste development achieve AONB conservation and enhancement? • Wycombe Air Park – in setting of AONB • Aylesbury South East North of A41 (Weston Turville/Aston Clinton) – in setting of AONB, visible from important public views on chalk escarpment, cumulative effect from other developments eg growth of Aylesbury Garden Town, HS2, and East-West Rail. • Triangle Business Park (Stoke Mandeville) - in setting of AONB, visible from important public views on chalk escarpment (Coombe Hill), cumulative effect from other developments eg growth of Aylesbury Garden Town, HS2, and East-West Rail. • Sands Industrial Estate – in setting of AONB • Asheridge Road (Chesham) – in setting of AONB - given this, on what basis can it be given an 'in principle' acceptability for waste development (Preferred Options para 5.88)? <p>9) Local Plan monitoring framework – disagree with trigger point for Policy 23. Rather than a trigger if “more than two” proposals are approved, this should be replaced with “Any”. The AONB is an irreplaceable nationally designated asset. Minerals and waste developments are often major in their scale and impacts, there should not be even one non-policy complaint approval.</p>	<p>The plan is not able to prohibit such development however can place strict requirements to conserve the AONB, which Policy 9 seeks to do.</p> <p>Waste development is not prohibited within the AONB – the Chilterns AONB management plan supports waste being managed close to its origin in line with the proximity principal (Ref Chilterns AONB management plan, Key issues 14, pg 73). Policy D18 supports sustainable waste management and acknowledges that (small-scale) waste management sites may be needed to serve communities within the AONB however that these may be contentious and should be sensitively sited and located to avoid detrimental impacts on the landscape or settlement character and to avoid disturbance to local amenity (which the MWLP acknowledges).</p> <p>Table 10, Policy 23, Trigger point, amend to read: “One proposal is approved (within the plan period) that does not comply with criteria”.</p>
Environment Agency (EA)	<p>Flood risk management Sequential test and Strategic Flood Risk Assessment (SFRA) We have read the following documents about your sequential test:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Non-technical summary of Buckinghamshire’s Strategic Flood Risk Assessments and Methodology for the application of the sequential test for proposed mineral and waste allocations, dated April 2017. 	<p>This information is set out in the technical annex which includes the site assessments for all sites brought forward.</p>

	<p>□ Sequential Test of proposed mineral allocations and water locations, dated July 2017. Sequential Test of proposed mineral allocations and water locations Section 1.6 and 1.7 In sections 1.6 and 1.7 of the above document you have stated that the site allocations for all minerals and waste sites have passed the sequential test. Please can you clarify if there was a call for sites and any of those sites were discounted and for what reasons. I want to have a better understanding of the sequential test process you have gone through to reach your conclusions. Section 1.16 In section 1.16 and in Appendix 1 (Climate change sensitivity column) you have stated that we have not updated our flood maps to include climate change. We are not required to do this immediately but we will be updating future flood risk models to include climate change as and when they are worked on. You will need to include the new climate change allowances in your SFRA in order to be compliant with the NPPF paragraphs 158, 165-167 which states that you should have an up-to-date and proportionate evidence base. By not including this evidence it could have an impact on the deliverability of some of your minerals and waste site allocations. Especially those within Flood Zone 2. Please can you tell us whether you have considered using the SFRA data and modelling from district planning authorities within your county. You could use their data which should include the new climate change allowances to inform your own SFRA.</p>	<p>Para 1.16 The best available information was utilised in undertaking the assessment. The new climate change allowances were released by the EA in February 2017. However the EA mapping has not been updated accordingly, they will be updating it as and when is needed. The best available information and mapping (regarding flood risk and climate change allowances) has been utilised in the assessments. The climate change analysis outcomes for sites include a requirement for these new standards to be used to inform the site-specific FRA accompanying the planning applications put forward for the sites. This is not considered unreasonable, as the cost of re-modelling is extensive and the maps remain in the responsibility of the EA. Undertaking a full update/review of the existing BCC SFRA is not considered necessary given the scope of the MWLP, and is not proportionate to the plan-making process. It should be noted that the document is not an SFRA – it is a non-technical summary of the existing flood risk management evidence (SFRAs and other related documents) as relevant to minerals and waste development, and includes the sequential test of the proposed allocations/designations. It is interesting to note that within neighbouring areas a different approach has been taken in terms of including new climate change allowances in order to be compliant with the NPPF paragraphs 158, 165-167 (which states</p>
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	<p>Appendix 1 - In appendix 1 there is a column with the heading of 'Site/location specific development requirements' Some of the main rivers are listed in this column. Environmental permits are mentioned in this column and a 9 metre buffer is quoted. For the purposes of clarity and accuracy this column needs some amendments and additions. These are that the 9m buffer zone for environmental permitting purposes is for rivers in the north of Buckinghamshire and not the whole county. The byelaws for main rivers depend on which water management catchment they fall into. The 9m buffer zone is a requirement for river in the East Anglia catchment. The rest of Buckinghamshire is covered by Thames area and Herts and North London catchments and the byelaw for the river corridors for those areas is 8 metres.</p> <p>Please also be aware that there is a 16m stand-off between the top of bank for main rivers and the quarrying of minerals. This is also under the Environmental permitting regulations</p> <p>The environmental permitting regulations say that:</p> <p>“(k) any quarrying or excavation within 16 metres of a main river or any flood defence structure or culvert on that river which is likely to cause damage to or endanger the stability of the banks of that river.”</p> <p>Therefore you will need to be aware of this when allocating any minerals sites adjacent to main rivers as this will require a 16 metre buffer zone to protect the rivers from pollution and from any quarrying activity which may result in the loss of water from the river channel.</p>	<p>the need for an up-to-date and proportionate evidence base), under which re-modelling was not required as it has been seen as un-proportionate. Reference to the latest climate change standard and site-specific policy advice and guidance has been incorporated instead. This approach has been taken for all development, including residential and commercial - which have a much higher risk associated with them compared to mineral and waste sites.</p> <p>In terms of the final comment made by the EA, the only District SFRA that incorporates the updated climate change modelling is Aylesbury Vale. The minerals and waste sites were not included/sequentially tested as part of this update and the mapping is too coarse to provide any context for the minerals and waste sites being assessed.</p> <p>Site specific development requirements will be amended accordingly.</p> <p>Policy 17 - There is no need to amend the policy as the MWLP forms part of the Development Plan, proposals must comply with relevant policies of the Development Plan (and other higher level policy e.g. NPPF/NPPW etc). The site assessments will be amended to make a note of relevant buffers</p>
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	<p>However please note that Wycombe District Council has an adopted policy for a 10 metre ecological buffer zone in their Delivery and Site allocation document.</p> <p>Aylesbury Vale District Council also have an emerging policy for watercourses that also includes a 10 metre buffer. This will also need to be recognized and incorporated into your local plan policy.</p> <p>Preferred options Consultation Buckinghamshire Minerals and waste local plan.</p>	
	<p>The following comments cover your draft flood risk policy and the supporting text within the local plan and soundness issues. We strongly recommend that you cover these points within your local plan in order to be compliant with the NPPF paragraphs 93, 94, 100 and 101. We are only commenting on fluvial flood risk in this response.</p> <p>Policy 17 - Managing Impacts on Amenity and Natural Resources</p> <p>We are disappointed to see that policy 17 is very general. It's not clear what is meant by 'unacceptable adverse impacts.' Please can you clarify what is meant by this wording? We recommend that you include a flood risk policy that requires development to demonstrate the following. The first bullet point should be followed in the first instance when considering development in flood risk locations:</p> <ol style="list-style-type: none"> 1. Development in flood risk areas is avoided 2. If development has to go within a flood risk area and you can justify this with evidence then the sequential approach needs to be applied to these sites. This is particularly important when considering minerals sites within mixed flood zones. So for example, within Flood Zones 1,2 and 3 or in Flood Zone 3 with varying depths of flooding or flood flows. Development of a higher vulnerability in accordance with Table 2 of the Planning Practice Guidance should be placed in a lower flood risk zone. 3. Please note that where development is not appropriate in table 3 of the Planning Practice Guidance then we would object to any planning application with development in these locations. Therefore you need to consider the deliverability of sites in such locations and be able to justify these sites allocations to a Planning Inspector. It would be worth incorporating this point into your flood risk policy. 4. Development shall not increase flood risk elsewhere and shall seek to reduce flood risk 5. Development impacts can be managed through robust compensation and mitigation measures and shall seek to reduce flood risk. 6. Flood protection, resilience and resistance measures are provided as 	<p>Policy 17 - The intention is to be general as this provides a wide scope for assessment of development proposals and potential adverse impacts, which vary dependant on the resource/asset/feature of relevance and site specific parameters/context.</p> <p>The recommended wording set out in the response largely reiterates national policy (which there is no need to do) and also covers some areas that are currently addressed in the draft plan policies. Policies are proposed to be amended to expand on flood risk as below (in Planning Authority response to EA).</p>

	<p>part of development proposals. We recommend that you also include the requirement for the new climate change figures within the supporting text for a flood risk policy. Developers will need to be aware of this guidance and you will need to use the new climate change figures to inform your local plan policies and SFRA evidence base. The link to the climate change guidance is https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances. Policy 26: Delivering High Quality Restoration and Aftercare A bullet point in policy 26 states: “Sites located within river corridors should address flood management and support River Basin Management Plan actions.” This should include the following minor wording change for clarity and accuracy: “Sites located within river corridors should address flood risk management and support River Basin Management Plan actions.” Another point that should be included in this policy is that, flood risk can be reduced through the restoration of mineral workings.</p>	<p>Policy 26 - Agreed, Policy 26 will be amended accordingly. <input type="checkbox"/> Sites located within river corridors should address flood <u>risk</u> management and support River Basin Management Plan actions.</p> <p>This is acknowledged in para 7.85, however the end of the first sentence could be amended to read “, <u>in particular for example</u> flood risk management measures (such as the development of flood storage), <u>and improvements to flood flow routes and measures to reduce flood risk</u>”. Amend para 7.12 to read “to implement flood management measures <u>and reduce flood risk.</u>”</p>
	<p>Clay extraction Extraction of clay is a ‘less vulnerable’ development in accordance with Table 2 of the Planning Practice Guidance and would not be appropriate in Flood Zone 3b (functional floodplain). Table 3 of the Planning Practice Guidance says that less vulnerable development within Flood Zone 3b should not be permitted. This should be acknowledged within your local plan policy. Groundwater quality and protection The following comments cover groundwater quality policy and the supporting text within the local plan and soundness issues. We strongly recommend that you cover these points within your local plan in order to be consistent with the NPPF paragraphs 109, 120, 121 and 122. Policy 17 - Managing Impacts on Amenity and Natural Resources</p>	<p>There is no need to reiterate national policy or guidance.</p> <p>Policy 17 - This point is already captured under policy</p>

	<p>We are pleased to see that water quality and water resources are included in policy 17. However this also needs to cover groundwater protection and the acknowledgment of the presence of source protection zones (1, 2 and 3) and principle and secondary aquifers as sensitive receptors. We recommend that you include a separate water quality policy in your local plan that requires development to demonstrate the following.</p> <ul style="list-style-type: none"> - The development would not result in unacceptable impacts on the intrinsic quality and quantity of water resources (including ground and surface waters) including any adverse impacts on Source Protection Zones (SPZs). <p>We do not want development on potentially contaminated land to form pathways through the contaminated land into the groundwater aquifers beneath the site. Therefore we don't want to see infiltration drainage in contaminated land and the piling methods for development need to be considered carefully. These points will need to be considered in your local plan policy.</p> <p>In the supporting text for this policy please can you refer to The Environment Agency's approach to groundwater protection March 2017 Version 1.0 available on the .gov.uk website at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/620438/LIT_7660.pdf</p> <p>This document updates Groundwater protection: Principles and practice (GP3).</p> <p>You will be able to use The Environment Agency's Approach to Groundwater Protection Guidance to see where we will object to certain development within source protection zone 1 (SPZ1) such as landfills or where a risk assessment is required for a particular development. We will also have objections to any works that may disturb the groundwater aquifer in SPZ1 in terms of water resources and potable water supplies. This is an issue that you will need to consider when allocating sites and for any future windfall sites within your district. You will also need to consider any site allocations within source protection zones 2 and 3 and the protection of these aquifers. You will need to think about the deliverability of these sites within your county.</p> <p>Paragraph 7.9</p> <p>Please can you add the following text at the end of paragraph 7.9: "Source Protection Zones around potable abstractions are areas of high</p>	<p>17, however the 1st bullet point will be amended to read: quality and quantity of water resources and flood risk (including ground surface waters), Source Protection Zones and flood risk.</p> <p>In addition para 7.9 (last sentence) will be amended to read: "It is therefore important to ensure that development proposals do not result in unacceptable impacts on the intrinsic quality and quantity of water resources (including ground and surface waters) including any adverse impacts on Source Protection Zones (SPZs) (footnote).</p> <p>Footnote to read: "SPZs around potable abstractions are areas of high groundwater sensitivity where restrictions could be applied and permits not granted. Refer to the Environment Agency's approach to groundwater protection March 2017 Version 1.0 available on the .gov.uk website at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/620438/LIT_7660.pdf</p> <p>Noted – the matters raised would normally be reference/undertaken in line with the site specific SFRA or evidence to accompany the planning application.</p>
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	<p>listed in your local plan document. These watercourses and water bodies contribute to the protection, enhancement and creation of green infrastructure requirement in NPPF paragraph 114. The protection and enhancement of watercourses and their associated buffer zones will play an important part in the adaptation of protected and non-protected flora and fauna to climate change.</p>	<p>would make the document unnecessarily lengthy and would not add any value, particularly as such information is available through interactive web mapping tools.</p>
	<p>Policies 19, 24 and 25 in your local plan all involve elements that will impact on biodiversity and the natural environment. Our main concern is the river corridors and their ecological buffer zones. We would expect to see you adopting a local plan policy identical to Wycombe District Council adopted policy DM15 Protection and Enhancement of River and Stream Corridors of the Wycombe District Delivery and Site Allocations for Town centres and Management Development, adopted July 2013. We recommend that you include a protection and enhancement of watercourses policy that requires development to demonstrate the following.</p> <ul style="list-style-type: none"> <input type="checkbox"/> An undeveloped 10 metre ecological buffer zone measured from the top of bank of the watercourses <input type="checkbox"/> That the buffer zones are fenced off and protected during the operational phase of minerals extraction <input type="checkbox"/> An ecological management plan for river corridors including ecological buffer strip from top of bank including the planting and management of native species <input type="checkbox"/> That restoration and aftercare of minerals excavation provide opportunities for protection and enhancements to watercourses and their ecological buffer zones. <input type="checkbox"/> That the de-culverting of watercourses are actively pursued. <input type="checkbox"/> Protected species and habitat are surveyed for along river corridors <input type="checkbox"/> Consideration of any bridge crossings which will need to be a clear span design in order to minimise the impact on the river corridor, its ecological buffer and its native flora and fauna <p>We strongly recommend you write this as a separate policy. This will then be consistent with Wycombe and Aylesbury local plan policy and safeguard watercourses in other districts within your county. Within your site allocations there are some sites that are adjacent to or have watercourses running through them. When considering development for these sites please be aware of the above requirements and the requirements of the environmental permitting regulations for main rivers including the byelaw distances for main rivers either 8 or 9 metres</p>	<p>Matters such as appropriate buffers and site management plans to address ecological areas and watercourses are to be determined on a site-by-site bases through the planning application process with consideration given to adopted policy of the Development Plan and any regulatory requirements. Relevant buffers will be noted in the site assessments.</p> <p>The general matters raised are addressed through Policy 17, 19, 21, 24, 25, 26. A separate policy is not considered necessary. Noted.</p>

	<p>in Buckinghamshire County Council and as mentioned earlier in my response a 16 metre stand-off is for quarrying adjacent to main rivers. This is something to consider when allocating your sites and whether they will be deliverable or not in the light of the above the above requirements.</p>	
	<p>Some rivers or the land adjacent to them are designated with a SSSI status. Please be aware that NPPF paragraph 118 states that: “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. 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.”</p> <p>Therefore you will have to consider this policy when allocating any sites within your local plan and the deliverability of those sites.</p> <p>Final Comments</p> <p>We look forward to working with you to produce a sound and robust local plan for the Buckinghamshire Minerals and Waste Local Plan. We welcome the opportunity to liaise with you and review any further evidence documents or revised planning policies under our cost recovery service. For further information about this service please contact us. Our comments are based on our available records and the information as submitted.</p>	<p>Noted – the site assessments (and HRA as appropriate) take account of such matters, which would also be assessed through the planning application process as sites came forward.</p>
Historic England	<p>The fourth sentence of Paragraph 2.3 should refer to the historic environment, in accordance with paragraph 143 of the National Planning Policy Framework.</p> <p>Subject to the comments of the Chilterns Conservation Board, Historic England welcomes and supports Policy 23. Historic England welcomes and supports Policy 24.</p>	<p>The intent was to capture the historic environment under “built environment”, however para 2.3 can be amended to read “The need to ensure that development does not have unacceptable adverse impacts on communities as well as the built, natural and historic environment forms a key element ...”</p> <p>Noted.</p> <p>Noted.</p>
Natural England	<p>Policy 9 /pg. 37 Plan Text - the site and equipment is not located within the Chilterns Area of Outstanding Natural Beauty (AONB); and Proposed Changes in Italics</p>	<p>Policy 9 - Agreed, amend as suggested.</p>

	<p>- the site and equipment is not located within the Chilterns Area of Outstanding Natural Beauty (AONB) <i>or its setting</i>; and</p> <p>Comments The protection of the AONB also applies to the setting. The setting is the area around the AONB that can have visual impact on the AONB Policy 11/ pg. 52 Plan Text Facilities for the preparation of wastes for re-use and recycling within or adjoining the Chilterns AONB will be supported where appropriate. Proposed Changes in Red Facilities for the preparation of wastes for re-use and recycling within or adjoining the Chilterns AONB will <i>only be supported where impacts to the AONB or the setting can be sufficiently mitigated.</i> Policy 16/ pg. 65 Plan Text operations do not have unacceptable adverse impacts Comments This policy has insufficient detail to ensure that STW will not impact the intimidate environment and downstream designated sites. 6.1 Plan 1 / pg. 66 Comments Is it possible to have Burnham Beeches area with the hydrology catchment, and other designated sites removed from the focus areas in this map?</p> <p>7.17 / pg. 70 Plan Text - Restoration and aftercare of mineral extraction sites within such areas should ensure that the land is restored to a condition where it enables the land to retain its longer-term capability and is a high quality resource for the future. Comments "longer-term capability and is a high quality resource for the future" is very vague. Would it be better to talk about the finite resource of BMV agricultural land and that BMV land should be restored to BMV quality? Possibly reference policy 26.</p>	<p>Policy 11 - Not necessary as there is a separate policy addressing the AONB – the plan is to be read as a whole.</p> <p>Policy 16 - The policy also states that proposals would need to comply with relevant MWLP policies, this includes the policies set out in S7 of the MWLP which capture such matters.</p> <p>Plan 1 - The areas of focus (for mineral extraction) as shown on Plan 1 are intended to guide development – the identification of such areas does not infer grant of planning permission. Any sites coming forward would need to comply with the MWLP policies and national policy which would prevent development within such nationally designated sites. The issue of removing these sites may create an expectation that other designations and landuses should then also be removed and how far this should extend. Para 7.17 - "longer-term capability" is derived from the NPPG paragraph: 040 Reference ID: 27-040-20140306. For clarity amend end of sentence to read "(i.e. of equal or greater quality BMV agricultural land prior to extraction)". As the MWLP is to be read as a whole the use of cross-referencing is not necessary.</p>
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	<p>Policy 17 / pg. 71 Plan Text A site-specific management plan should be developed where appropriate to ensure the implementation and maintenance of such measures throughout construction, operation, decommissioning and restoration works as well as from transportation. Proposed change in red A site-specific management plan should be developed where appropriate to ensure the implementation and maintenance of such measures throughout construction, operation, decommissioning and restoration, <i>including any ongoing maintenance required. The management plan should also include measures for transportation.</i> Sustainable Transport / pg. 71 Comments Is it possible to add a point to this section discussion the A355 and its connection the Burnham Beeches and to avoid using this route wherever possible? While the HRA said there were likely low levels of vehicle movements when in-combination with the massive development in the area any avoidance is advisable.</p> <p>Map 5 / pg. 76 Comments Please add the allocated sites to this map to allow easy identification of potential impacts.</p> <p>7.37 / pg. 77 Comments We support the ideas expressed in this paragraph but they are not carried through into the policy</p> <p>Policy 19 / pg. 78 Plan Text</p>	<p>Policy 17 - Amend Policy 17 to read “decommissioning, restoration works (including aftercare) as well as from transportation.” Aftercare within Policy 26 references management and monitoring.</p> <p>Sustainable transport / pg 71 - Para 7.23 amend to add new sentence at end to discuss the A355 and its connection to the Burnham Beeches and preference to avoid using this route. “... Of particular note, Burnham Beeches SAC is located within the south of the county, with the A355 running in a north-south direction to the east. In order to avoid having a significant effect on the interest features of the SAC, transport movements associated with minerals and waste development should avoid using this route”.</p> <p>Map 5 - The intent of the map is to identify the ecological networks as per the NPPF requirements – not to identify potential adverse impacts. If it were the later a similar map would need to be produced for every other category of sensitive receptor/designation. Government departments/agencies, the council, developers and their agents are able to access the GIS datasets to identify such impacts. Should NE wish to obtain an electronic copy of the GIS dataset for minerals and waste sites the county council will be happy to share this data. Para 7.37 - This paragraph provides additional detail to the assessment required under the third para of policy 19.</p>
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	<p>- Ancient woodland along with aged and veteran trees, should be protected unless it can be demonstrated that the need for, and benefits of, the development clearly outweigh the loss. Proposed changes in italics - Ancient woodland along with aged and veteran trees <i>are an irreplaceable resource</i> that should be protected. <i>Permission will only be granted where it can be demonstrated that the need for, and benefits of, the development clearly outweigh the loss.</i> Policy 19 / pg. 78 Plan Text - Regarding undesignated natural environmental assets, proposals should aim to: conserve and enhance biodiversity; and prevent harm to geological conservation interests. Proposed changes in italics - Regarding undesignated natural environmental assets, proposals <i>must conserve biodiversity and wherever possible provide a biodiversity net gain. Proposals should also prevent harm to geological conservation interests.</i> Comments It should not be an “aim” to conserve biodiversity. The conservation of biodiversity is required under the NPPF and NERC Act Policy 19 / pg. 78 Plan Text Development should provide net gains in biodiversity where possible, in doing so: Proposed Changes in italics Development should provide net gains in biodiversity <i>wherever possible</i>, in doing so: Comments The new local plans in Bucks are now all asking for biodiversity net gain as a requirement. It would be a good step forward if you could remove the “wherever possible” all together. Chilterns AONB/ 84 Comments This whole section is out of order. It should be moved before the Landscape Character section. The AONB policy should be policy 21. 7.58 (6.27) / 84 Comments This paragraph should be re-written to state that the AONB will be</p>	<p>Policy 19 - Agreed, amend as suggested. “Ancient woodland along with aged and veteran trees are an irreplaceable resource that, should be protected. Permission will only be granted where unless it can be demonstrated that the need for, and benefits of, the development clearly outweigh the loss”.</p> <p>Policy 19 - Amend to delete “aim to”. <input type="checkbox"/> Regarding undesignated natural environmental assets, proposals should aim to: conserve and enhance biodiversity; and prevent harm to geological conservation interests. Where significant harm is likely to result from the proposed development permission will only be granted where it can be demonstrated that the effects can be avoided and/or minimised to an acceptable level, or as a last resort, appropriate compensatory measures provided.</p> <p>Policy 19 - Agreed, amend to delete “where possible”. Development should provide net gains in biodiversity where possible, in doing so:</p> <p>Chilterns AONB/Pg 84 - The order of the policies does not affect soundness of the plan.</p> <p>Para 7.58 - The paragraph reflects national guidance on</p>
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	<p>protected and that mineral extraction would only be allowed at this site if it were at risk of being sterilized. E.g., if other development was approved then it could be first extracted but no other reason would be appropriate to extract this area.</p> <p>Policy 23 / pg. 85 Plan Text Proposals for mineral extraction within or adjoining the Chilterns AONB will be permitted where it can be demonstrated.....</p> <p>Proposed Changes in italics Proposals for mineral extraction within or adjoining the Chilterns AONB will <i>only</i> be permitted where it can be demonstrated.....</p> <p>Policy 23 / pg. 85 Plan Text - includes opportunities, where appropriate, to enhance the character, assets and appearance of the AONB, including ensuring a high standard of design for development and integration of the site within its landscape setting; and</p> <p>Proposed Changes in italics - includes opportunities, where appropriate, to enhance the character, assets and appearance of the AONB, including ensuring a high standard of design for development, <i>integration of the site within its landscape setting and provide a biodiversity net gain for the site</i>; and</p> <p>Policy 26 / pg. 93 Comments An additional point is needed in this policy around the use of appropriate species, including seed mixes, to be tailored to the site for restoration, to ensure; 1. local provenance is maintained; and 2. species able to cope with climate change are planted</p>	<p>identification of MSAs.</p> <p>Policy 23 - The intent/outcome is the same – no amendment necessary.</p> <p>Policy 23 - Biodiversity gains and landscape character are addressed in other policies (19,21 & 25) – the plan is to be read as a whole.</p> <p>Policy 26 - Refer to Policy 24 which addresses such matters.</p>
Network Rail	<p><i>Policy 8: Rail Aggregate Depots and Wharf Facilities</i> Development of sites containing railheads should be considered in consultation with Network Rail as the loss of sites which have direct access to the rail network can greatly impact international rail freight operations and the growth of rail freight.</p>	Noted.
Thames Water	<p>Thames Water are the statutory water and sewage undertaker for a large proportion of the County and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.</p>	Refer to planning authority response to Anglian Water representation above.

	<p><i>Specific Comments</i></p> <p><i>Policy 15 – Development Principles for Waste management Facilities, Page 64</i></p> <p>Whilst Thames Water broadly support Policy 15, they are concerned that they would not be able to comply with the policy as it is currently written. Sewage Treatment Works require access to a suitable watercourse to allow the discharge of treated water and should not be limited to those areas identified as a focus for additional waste management.</p> <p>As such we would like to request that Policy 15 is amended to make it clear that development of new and existing sewage treatment works would not be restricted by this policy. It is suggested that the first sentence is amended to read as follows: ‘Proposals for waste management facilities (<i>excluding sewage treatment works</i>) must demonstrate that the development:....’</p> <p><i>Policy 16 – Sewage Treatment Works, Page 65</i></p> <p>Thames Water as a statutory utilities undertaker is required to provide sufficient sewage treatment capacity to serve existing customers and new customers. Thames Water work closely with those Local Authorities in the Buckinghamshire County and developers so that any potential upgrades or improvements which may be required to support future growth are identified early. Where an upgrade or improvements are required to an existing sewage treatment works, it is identified and funded through our business planning process.</p> <p>It is considered that Policy 16 as currently drafted is not sufficiently positive in enabling the continued operation and development of existing sewage treatment works to enable Thames Water to fulfil their statutory obligations under the Water Industry Act 1991. It is considered that Policy 16 should be amended to so that it is supportive of proposals at existing sewage treatment works which are required in relation to their undertaking as a statutory undertaker.</p> <p>It is therefore suggested that Policy 16 should be amended as follows: ‘Proposals relating to the role, function and operation of existing sewage treatment works including the provision of additional sewage treatment capacity and/or supporting infrastructure will be supported where compliant with relevant MWLP policies.</p> <p>Proposals for extensions to existing sewage treatment works (STWs), new STWs, or for the co-location of STWs with other waste management facilities will be supported where it can be demonstrated that there is a need for increased capacity to support sustainable development,</p>	
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	<p>operations do not have unacceptable adverse impacts, the scale of the development reflects the role of the location with respect to the settlement hierarchy and the proposal complies with relevant MWLP policies.'</p> <p><i>Policy 28 – Minimising Land Use Conflict, Page 96</i></p> <p>Thames Water broadly support draft Policy 28. They would however like the final paragraph of the policy to be amended to provide clarification as to what mitigation is being referred to in this context. For example it is unlikely to be able to mitigate odour impact from existing sewage treatment works particularly where residential development is proposed.</p>	
Aggregates Industries UK Ltd	<p>Page 35, Policy 7: Provision of Secondary and Recycled Aggregates – It is noted that preference will be given towards sites at existing and discussed railheads and wharves. By neglecting to safeguard existing, planned and potential rail heads and wharves, the MWLP consultation document fails to support those sites which already or could provide a suitable site for these operations.</p> <p>The consultation document does not safeguard existing, planned and potential sites for concrete batching, the manufacture of coated materials, and other concrete products. As drafted the draft MWLP is unsound.</p>	Refer para 7.89, footnote 41 and Policy 27.
CEMEX	<p>CEMEX welcome the review of the adopted Plan.</p> <p>CEMEX welcome the fact that Buckinghamshire set out in paragraph 1.3 the plan period of 1 January 2016 to 31 December 2036</p> <p>Policy 5 – Development Principles for Mineral Extraction – CEMEX support generally the approach to this policy.</p> <p>Policy 7 – Provision of secondary and Recycled – CEMEX support this policy</p> <p>Chapter 7 – The Control and Management of Minerals and Waste Development – This plan does not contain a policy reflecting the NPPFs presumption in favour of sustainable development.</p> <p>Policy 17 – Managing impacts on amenity and natural resources – CEMEX support the wording of this policy.</p> <p>Policy 18 – Sustainable Transport – CEMEX note the first criterion relating to the identification and viability of opportunities for alternative to road based transport. The market and value of sand and gravel product means that it is unlikely to be ever economic to transport sand and gravel by means other than road.</p> <p>Policies 19, 20 and 21 – CEMEX broadly support the wording of these draft policies.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>There is no need to reiterate national policy or guidance, the presumption in favour of sustainable development is noted in para 1.5.</p> <p>Noted.</p> <p>This is widely acknowledged however does not mean that such alternatives should be automatically discounted as there are instances, such as site extensions where conveyor and other such alternatives are utilised to carry mineral from the extraction site to processing plant.</p> <p>Noted.</p>

	<p>Policy 22 – CEMEX support this policy. Policy 25 – CEMEX question how developers can deliver off site enhancements. This would only be possible in the land is within the control of the developer.</p> <p>Policy 28 – CEMEX support the intentions of this policy. The policy will be difficult for Buckinghamshire CC to implement as it will be dependent on planning permissions granted by the district councils. This policy may sit better in the plan if located near the safeguarding policy or integrated into the proposed safeguarding policies.</p>	<p>Noted. This is dependent on the options available and gives a window of opportunity regarding enhancement of designated sites within the local area (e.g. LWS, river corridor restoration, etc).</p>
IM Land	<p>The Waste and Minerals Local Plan Preferred Options document relates to the area of Buckinghamshire, including the area to the north of Slough which lies within South Bucks Council. This area is of significant importance to the long term growth and success of Slough which is itself an underbounded authority with a tightly drawn administrative boundary. Slough Borough Council has demonstrated through the work on its own emerging Local Plan that it is unable to accommodate its own development needs within the Borough's administrative boundary. IM Land consider that it is important to the long term success of the area (including to the area's economic growth) that these development needs are met in full. Furthermore this point is reinforced by the importance of Slough on the strategic road and rail network and the need to maximise the benefits derived from significant infrastructure projects such as Crossrail and the Western Rail Access to Heathrow.</p> <p>In light of these comments, IM Land consider that the emerging Waste and Minerals Local Plan should not seek to include any policies, designations or allocations which might fetter the long term planning of the area around Slough and the opportunities to meet the development needs in full. The Waste and Minerals Plan should not include such policies, designations or allocations where this would harm the ability of the area to accommodate much needed housing (in particular family housing), provide critical infrastructure and fail to support the long term success of the area.</p> <p>Notwithstanding the above, there may be opportunities for mineral extraction in the area which could be phased to take place before the comprehensive development of the area takes place or be factored into the phasing of that development and IM Land consider that these should be explored. The Waste and Minerals Plan should help to facilitate this, and therefore support economic and job growth in the sector.</p>	<p>The respondent is being somewhat presumptive in relation to an area of the MWLP plan area that has been suggested by a planning authority that does not cover the area. However even if long term development proposals in part or all of this area come forward then these proposals will have to acknowledge what is allocated or committed in this area in relation to minerals and waste development (including mineral safeguarding areas) and work around such policies/development.</p>

<p>HG Matthews</p>	<p>My comments are confined to two elements of the Plan as presently drafted: the section headed 'Non-aggregate mineral development' including Policy 5, and the Section headed Chilterns Area of Outstanding Natural Beauty, including Policy 23.</p> <p>I write in general support of these sections of the Plan in so far as they are relevant to the Brickworks; and particularly in support of the wording of the fourth bullet of Policy 5 and the first bullet of Policy 23 which together should have the effect of enabling the future supply of a range of clays and related minerals from within the Chilterns AONB to support continued specialist brick manufacture at Bellingdon.</p> <p>I offer some further information about the brickworks at Bellingdon as context for our support for these two policies and indeed, their importance to the continued health of the local brick making industry.</p> <p>The northern parts of the Chiltern Hills have long been synonymous with brick making. The Bellingdon site has been producing bricks since the 1920's. Then, there were some 20 local brickmaking factories within 5 miles of Chesham, whereas, since the closure of the Bovingdon Brickworks (just over the County border in Hertfordshire), H G Matthews is now the sole specialist supplier in the Chilterns. The company employs about 60 people.</p> <p>The Bellingdon bricks are used locally for restoration/conservation and sympathetic new build in the Chilterns, but also across the Country and even abroad in instances where for instance a high quality handmade brick is required. The market for these bricks can fluctuate depending upon both the economy and upon particular specialist needs, but overall production at Bellingdon has been increasing in order to offset the demise of the Bovingdon works (and that of Dunton a few years earlier). Different specification bricks demand different clays. The Chalfont red brick for instance is a pure red colour which is made solely from the clay from Froghall quarry near Chalfont St Giles; it is not mixed with other materials.</p> <p>Other bricks are made using a mix of the local Dundry clay found at Bellingdon (70-75%) and a locally sourced clay loam (25-30%) which has been dug from the nearby Arrewig Lane sand pit. The addition of the loam improves the quality of the bricks and significantly reduces wastage. Loam has been used by H G Matthews since the 1940s and is a notable reason for the company's continued success. Those companies who did not have access to a loam gradually fell by the wayside. At present about 50% of Bellingdon bricks are handmade, 50% machine made. Matthews</p>	<p>Noted – information will be included in the LAA as appropriate to provide for local context.</p>
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	<p>also supply lime mortar and plaster for historic buildings, which requires a small amount of chalk.</p> <p>Whilst not always possible, H G Matthews try to source materials from as close as possible to the factory and also from land owned by the Company, so that transport is minimised and the restored land is taken back into the Matthews farm holding.</p> <p>To supply the works the brick clay itself must be pure and free from flints and gravels. This pure clay outcrops in small localised pockets within the wider clay deposit. This can make it difficult to predict the quantity of suitable resource that might actually be secured from a given planning application area.</p> <p>H G Matthews has sought to develop strong sustainability credentials. As well as sourcing its raw materials from its own local quarries, it also uses a locally sourced timber to provide biomass for drying the all of the bricks as well as timber for the wood fired kiln. This fuel has replaced consumption of 400,000 litres of diesel per annum.</p> <p>Over the last couple of years the Company have been developing and trialling a new eco block called 'the Strock'. The Strock is made from a mix of clay and wheat straw from surrounding fields and will represent a niche product for the eco market. If successful, this product will reduce the vulnerability of the yard to fluctuations in the economy and reduce or avoid the wastage of the balance of the clay deposits worked for brick earth.</p> <p>For all of these reasons H G Matthews strongly supports the positive stance that Buckinghamshire County Council has taken toward the industry to date and the approach taken in the draft Plan.</p>	
Quattro	<p>In the context of waste management and specifically recycling of C, D and E Waste – the plan needs to be clear that there is no conflict between the requirements of and intent of Policy 14, Developing a Sustainable Waste Management Network, and Policy 2, Spatial Strategy for Minerals Development, and Policy 11, Spatial Strategy for Waste Management.</p> <p>The policy approach set out in Policy 2, “to support the recycling and processing of alternative aggregates at locations well linked to strategic transport networks and main urban areas, growth locations and key settlements, with a preference for the following locations: <i>mineral extraction sites</i>, on site as ancillary activity to construction....” and Policy 11: “Opportunities to co-locate waste management facilities together and with complementary activities will be supported particularly where relating</p>	<p>The reference to standalone waste management facilities does not capture inert recycling facilities developed as complementary activities/co-located with minerals extraction and processing. The supporting text will be amended to provide clarity on this matter. In addition Policy 2 will be amended to include processing sites as per Policy 11 for consistency. Policy 2 “...with a preference for the following locations: mineral extraction <u>and processing sites</u>”</p>

	<p>to industrial estates, waste management sites, and <i>mineral extraction and processing sites</i>, (for proposals for aggregate and/or inert recycling facilities) are fully supported by Quattro. There is a clear logic to locating C, D and E recycling facilities on minerals extraction sites to assist in moving material up the waste hierarchy.</p> <p>Quattro have made submissions in respect of two potential sites for allocation for provision of sand and gravel. Should those allocations be progressed by BCC, they would propose to take forward recycling activities for inert C, D and E waste at those sites (in conjunction with extraction and landfilling) in the same way they currently do at their existing extraction and landfilling operational site at All Souls Farm.</p>	
Summerleaze	<p><i>New Denham Quarry Extension (Denham)</i> Page 16 – the plan relating to the quarry extension is incorrect and shows the Field Cottage area rather than the Hillingdon Outdoor Activity Centre (HOAC) area. The correct area is shown on the attached HOAC plan.</p>	The MWLP will be amended accordingly.
D.K Symes	<p><i>Para 2.18</i> The 'local approach' to ensure an adequate and steady supply of minerals does not reflect the previous comments that planning for minerals 'needs to reflect the county's regional and sub-regional context' (2.15) as well as the 'strong spatial and economic relationship with Greater London' (2.13). 'Minerals can only be worked where they are found' (2.3) and due to the urban nature of Greater London they have very limited availability of mineral resource and if a 'steady and adequate' supply is to be maintained, then those adjacent / nearby authorities will need to contribute (as they benefit economically by being close to London). There is also the responsibility of the duty to co-operate with surrounding authorities. This paragraph needs to be amended to reflect the 'sub-regional' responsibility rather than 'local'. <i>Para. 4.3</i> The National policy to use recycled / secondary aggregate in preference to primary aggregate is recognised. However, it is very relevant to make clear in the Plan that the level of 'quality' of recycled / secondary aggregates are generally well below that of primary aggregates. This means that for most purposes where sand and gravel is used recycled / secondary aggregates would be unsuitable. The reason why they are unsuitable is that they are inherently weaker, or put another way, are incapable of being further upgraded.</p>	<p>Provision is based on ten year annual average sales and thus will have taken account of the already existing relationship of southern Buckinghamshire with Greater London.</p> <p>Para 4.3 provides an overview – refer para 4.70 which makes the point that “the quality, type and quantity of alternative materials varies and cannot fully replace materials used for certain construction purposes.”</p>

	<p>This paragraph should make this fundamental difference clear as it could be considered to mislead the reader into thinking that primary and recycled / secondary are readily interchangeable, which they are not.</p> <p><i>Para. 4.4</i> The demand / need for minerals is generated by the level of activity in the construction sector. This demand is met from a range of sources of which the mineral sites are a major contributor. The paragraph refers to 'sales' which in reality is 'production', which in many cases is limited by planning condition, or by the policy of the operator. This can give a misleading picture of the true level of need and it would be helpful if this difference was made clear as the conclusion of the paragraph does not reflect the current levels of demand.</p> <p><i>Para. 4.18</i> The NPPF recognises that there are many different land uses that need to be balanced in the planning system of which mineral extraction is one. The guidance on safeguarding / sterilisation is that 'prior extraction' should be 'encouraged' where practicable and environmentally feasible. Note, the guidance does not 'require' prior extraction. Further, the guidance is 'balanced' in as much as the 'where practicable' test applies to both the delivery of the non-mineral development, as well as the extraction of the minerals. This is understood to mean that each has to be given equal weight, namely the recovery of mineral (whether all or only a part) has to be done in a manner that allows the non-mineral development to take place (i.e. does not result in the site being unsuitable for the proposed development). The Plan does not reflect this 'balanced' guidance so is not in accordance with national policy.</p> <p><i>Para. 4.20 & 4.23</i> These paragraphs refer to a Mineral Assessment which is required to include a site-specific geological survey. It is accepted that it is necessary to have this level of detail at the application stage of a non-mineral development in an MSA, but it is questioned whether this level of detail is necessary at a Local Plan stage. Whilst it is a material planning consideration at the Local Plan stage, it is one of many that all need to be considered. As referred to above the NPPF does not give any more (or any less) weight to the presence of minerals. Further, the cost of a geological survey is noticeable and until there is greater certainty on whether or not the site is suitable for non-</p>	<p>The use of the term sales is in line with national policy/guidance. Comparison of sales and permitted output limit/vehicle restrictions from individual sites indicates that the majority of sites are operating below any maximum applied to the site (ranging from 10-50% below but most sitting at around 20% or more below) with only a couple of sites at their limit for the last few years.</p> <p>Refer para 4.19 “So as to prevent sterilisation within the MSAs the prior extraction of minerals will be encouraged where practicable and environmentally feasible.” This wording is reflected in Policy 1 and presents a balanced approach in line with the NPPF and guidance.</p> <p>Para 4.23 presents an opportunity for such matters to be addressed at an early stage through the plan-making process, or where this is not done as per Policy 1 through the planning application process.</p>
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	<p>mineral development, it is unreasonable to expect this level of detail. The published geological data and the fact that it is in an MSA will automatically identify that minerals will need to be considered as part of the evaluation of the suitability of the site, noting that guidance 'encourages' rather than 'requires' prior extraction and then whether all or only some of the mineral resource 'where practicable'.</p> <p><i>Para. 4.22</i></p> <p>The proposal for two applications where prior-extraction is practicable is too prescriptive. Where modest quantities of mineral can be recovered, often as part of the site construction works, this can be achieved through the non-mineral development planning permission. Whether one or two applications are needed will be determined by the scale / quantity of the minerals that can be recovered.</p> <p><i>Policy 1</i></p> <p>The requirement to demonstrate the need for the non-mineral development is 'overriding' is contrary to the guidance in the NPPF and should be deleted.</p> <p>The practicable and environmentally feasible test needs to be extended to say,</p> <p><i>'... - prior extraction of the mineral resource (or part only) is practicable and environmentally feasible and can be carried out without rendering the site unsuitable for the non-mineral development; or ...'</i></p> <p>Regarding the content of a Mineral Assessment, this should only be required at the planning application stage for the non-mineral development, and should be limited to the 'practicable and environmentally feasible' issues, not the general need / appropriateness of the non-mineral development (as this determination is the responsibility of the district authority). Consequently the first sub paragraph under the 'Mineral Assessment' section needs to be deleted.</p> <p><i>Para. 5.22</i></p> <p>The assumption that the arisings for CDE waste will remain constant throughout the plan period should be justified. Within this category Excavation (E-waste) makes up the larger volume and generally it is unsuitable to be recycled. Historically a noticeable proportion was used in 'exempt' sites but the Environmental Permitting system has been</p>	<p>The non-mineral development would (usually) be determined by the District planning authority whereas the mineral extraction development would be determined by the MPA – as such the plan notes that separate planning applications would be required.</p> <p>“Overriding” – refer to NPPG “Detailed advice on mineral safeguarding may be found in the British Geological Survey report Mineral safeguarding in England: good practice advice.” Paragraph: 003 Reference ID: 27-003-20140306.</p> <p>BGS para 2.3.3 “The process should ensure that minerals are not unnecessarily sterilized whilst allowing competing development to proceed if there is an overriding need for it.” and Case study 9 page 29 “there is an overriding need for the incompatible development”.</p> <p>The wording of Policy 1 is in line with national guidance. That the prior extraction can be carried out without rendering the site unsuitable for the non-mineral development would form part of the practicability. The need would be established through the planning application submitted to the district authority – as such including the same information or a summary in the mineral assessment would not be onerous and would assist in informing the decision making process.</p> <p>Refer to the WNA. The plan must be based on available evidence, the effects of future monitoring cannot be known. However para 5.22 can be amended to read: “A significant proportion (around a third) of inert waste is re-used, with over half of this thought to be reused on exempt sites. This unseen capacity is assumed to continue to be available throughout the plan period,</p>
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	<p>reviewed and there is no longer an 'exempt' category of site. Again, the assumption that the historically large volume of E-waste being 'lost' in the planning / permitting system will continue to be the case is questioned. If the changes achieve their objective that there is a clear audit (planning / permitting) trail, then the plan should recognise and make allowance for this.</p> <p><i>Para. 5.38</i> The above comments are very relevant when considering London's waste. It is recognised that the London Plan states that 95% of CDE will be re-used or recycled. It is also noted that the London Plan considers CDE waste used in restoration as being 're-used'. Despite the very aspirational target set by the London Plan, it is a fact that a large volume of CDE (mainly E-waste) is exported from London and is used to restore the mineral workings in the Home Counties. This high level of export will continue and should be looked on as a resource to enable the mineral workings in the 'Primary Focus Area' to be fully restored. A reference to this in the plan would be helpful.</p> <p><i>Para. 5.60</i> The changing emphasis in waste permitting recognises that within the CDE waste category there are materials that are well suited to restore mineral workings. In such cases the use is viewed as 'Recovery' compared to 'Disposal'. It would be helpful for this change in emphasis to be made in the text, otherwise the permitting system may over regulate the use of this 'reclamation' material such that it is not practical or economic to use. A suggested re-wording for the start of the second sentence could be, 'The use of suitable inert arisings should be ...'</p> <p><i>Policy 11</i> The above concern should be reflected in the last paragraph to avoid the confusion between the 'use for restoration' and 'disposal'. A suggested re-wording along similar lines, 'The use of suitable inert arisings is to be focused at existing and allocated mineral extraction sites to facilitate restoration.'</p> <p><i>Policy 18</i> The principles of the policy are supported but the requirement to identify market areas on an OS based map is considered to be unnecessary as well as impracticable. Waste and especially minerals are a service industry which responds to the needs of the market, but does not in itself</p>	<p><u>however it is anticipated that the amount of waste captured under exempt categories will decrease in line with revision of the Environmental Permitting system providing a more rounded view of management of this waste in the future."</u></p> <p>The unapportioned waste identified in the London Plan is municipal and C&I waste, not CD&E (of which a portion is captured under the CD&E arisings for Buckinghamshire) – refer to the WNA and addendum report.</p> <p>This is referenced in Table 6, the plan will be amended to provide greater detail/clarity with respect to inert recovery/fill and reference to the regulations (para 5.5). Reference to inert fill/recovery will be clarified through the document as appropriate.</p> <p>As above.</p> <p>The requirement is only for waste development as stated in the policy. The identification of the intended market base gives the county council a better understanding of where sales may be exported to. The requirement for waste development assists in assessing sustainable transport movements as well as providing an indication</p>
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	<p>generate demand. Therefore the market area will, by definition, be very general and geographically quite large. The requirement to indicate market is understandable but the provision of an OS based plan would not achieve any benefit, especially for minerals.</p> <p><i>Para. 7.49</i> It is helpful that the plan notes that Mineral Extraction is acceptable in the Green Belt, and in order to make it clear, this includes the normal ancillary activities that are allowed to take place under the general permitted development rights such as, access, processing, stockpiling, restoration, etc. This would avoid the misunderstanding that mineral extraction is confined to the 'digging only' which clearly, is not what is meant by the policy on Green Belt.</p> <p><i>Policy 22</i> This policy is supported, but with reference to the changes of waste permitting and for the benefit of flexibility, the sub paragraph referring to restoration would benefit by not referring to 'disposal' for the reasons set out in my comments to para. 5.60. A suggested re-wording could be, '...</p>	<p>of the level to which capacity within the county contributes towards self-sufficiency. This information will in turn assist in plan-making in the future and DtC matters. Incidentally similar policies have been adopted in other MPAs (including neighbouring authorities).</p> <p>Although the NPPF makes it clear that mineral extraction is not inappropriate, in some cases (appeal decision for sand and gravel extraction including processing at land at Pynesfield (APP/M1900/A/14/2218970)), on-site processing within the Green Belt may be inappropriate, this would need to be assessed on a site-by-site basis. Access and restoration would be classed as not inappropriate as these elements are an integral part of operations. <u>This will be clarified through amendment of the policy and para 7.49.</u></p> <p><u>7.49 “..form inappropriate development in the Green Belt provided that it preserves the openness of, and does not conflict with the purposes of including land in, the Green Belt”.</u></p> <p><u>Policy 22 Mineral extraction within the Green Belt will be supported provided that it preserves the openness of, and does not conflict with the purposes of including land in, the Green Belt and where compliant with relevant MWLP policies. Other than those required for the winning of mineral, elements of development considered integral to extractive operations include those associated with access and restoration. Other forms of development, including on-site processing, will be supported where compliant with relevant MWLP policies and national policy.</u></p> <p>Refer above regarding reference to inert disposal/recovery.</p>
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	<p>- restoration of a mineral extraction site involving the use of suitable inert material', <i>Policy 24</i> The recognition that for mineral extraction proposals it will be very difficult to address most of the criteria for this policy is supported.</p> <p><i>Policy 25</i> The policy states that all mineral proposals 'must' incorporate measures to enhance the environment. This could give rise to difficulties on some sites and the requirement of the landowner also needs to be given weight. A softening of the wording would be helpful, especially if landowners are to be persuaded to allow minerals to be worked.</p> <p><i>Para. 7.86</i> The interests of the landowner also needs to be given weight when considering restoration as they will be responsible for the management of the land following completion of restoration and aftercare. Generally landowners are sympathetic to environmental improvements, but the land has to 'earn its keep' into the future, hence a productive land use is needed. The views of the local community are also relevant, but they do not have any financial or ownership responsibilities. Recognising that if an adequate mineral supply is to be maintained then land / mineral owners must be persuaded to release land. In order to recognise this balance the requirements of the landowner needs to be added and the following is suggested , '<i>... ecological networks, the requirements of the landowner and the interests of the local community. ...</i>'</p> <p><i>Policy 26</i> In light of the above concern, the reference to the requirements of the local community should be removed, or it should be balanced by including the requirements of the landowner. On the basis that para. 7.86 is amended I suggest that the phrase 'and the requirements of the local community' is removed.</p> <p><i>Para. 7.93</i> The use of 'buffer zones' is not supported by national policy which advises that it should be site specific and based on environmental</p>	<p>Noted.</p> <p>The intention was that such outcomes could also be achieved through restoration of mineral extraction sites – this will be clarified through an amendment of the policy, e.g. new para at end of Policy 25 “Where such measures cannot be incorporated into development involving mineral extraction during the operational phases, and no viable opportunities exist for off-site enhancement measures, restoration of the site should deliver such enhancement measures as appropriate.”</p> <p>The return of land to its previous use is acknowledged in the third para (first bullet point) with economic development supported in the last para. Policy 26 and associated text will be amended to clarify the intent regarding return to agricultural land and landowner interests. Policy 26 “..The after-use of a site will be determined in relation to the land-use context and, surrounding environmental character (including wider ecological networks) and should take account of landowner interests and the of the local community.</p> <p>As above.</p> <p>The intent of the buffer zones is to trigger assessment and consideration of potential adverse impacts and potential land use conflicts, this will be clarified with para</p>
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	<p>criteria. A simple buffer zone approach is a blunt instrument and can result in unnecessary sterilisation of minerals or act as a blight on land use. There are adequate planning policies at both district and county level to ensure any development is environmentally protected and specifying an arbitrary distance is unhelpful.</p> <p>Whilst it is noted that it is written to protect permitted or allocated sites, it will be interpreted as being an undisturbed 'protection' zone to any mineral / waste development. For example, if this 300 metre buffer zone was applied to existing and allocated sites how much mineral would be sterilised.</p> <p>A similar 'buffer zone' approach was proposed in MWCS which was rejected by the Inspector.</p> <p><i>Policy 28</i></p> <p>In light of the above comments this Policy should be deleted as protection is already provided by other policies.</p> <p><i>Policy 29</i></p> <p>It is noted that the requirement to provide data that may be confidential will be treated as such (para. 8.8). Firstly it is questioned whether levels of extraction and input needs to be included in the policy as this data is already gathered outside the planning system. Secondly, if it remains in the policy, the confidential nature of this information needs to be recognised.</p>	<p>7.93 amended. The buffers are able to be reduced as per para 7.95. Incidentally similar policies have been adopted in other MPAs (including neighbouring authorities).</p> <p>Para 7.96 "<u>The purpose of the buffer zones is to trigger the identification of potential land use conflict and potential adverse impacts to ensure that such matters are given due consideration early in the decision making process</u>".</p> <p>As above.</p> <p>This is adequately reflected in para 8.8. The inclusion of such monitoring measures will assist the MWPA in the future in the case where any of the current arrangements are altered.</p>
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Specifically made no comment

Peterborough City Council
Amersham Town Council
Mayor of London

Other responses

There were 28 response forms that were started on Survey Monkey but no contact details were provided so these comments could not be included in the schedule above. Below is a summary of responses made on these forms.

Do you agree with how we have calculated future mineral requirements?

Yes = 15

No = 11

Yes comments:

- The figure is dependent on the state of the economy so you are probably safe to put it where it is but the likely post Brexit recession will mean that it is an overestimate but better that way around than an underestimate.

No comments:

- Because rate of building is increasing
- Pace and size of building has accelerated with that timescale
- No evidence in this survey, so how can an answer be given
- There is already sufficient gravel in South Bucks area to cover the additional amount required
- Use existing sites
- Extend existing sites
- You are including the requirements of other counties.

Do you think this amount of sand and gravel will provide adequate minerals for Buckinghamshire during this period?

Yes =21

No = 6

Yes comments:

- A lot depends on housebuilding strategy, which may change.

No comments:

- Acceleration of building is increasing
- Because you are including required amounts for other counties we won't need that much.

Do you agree with a primary focus for mineral extraction on the Thames and Colne Valleys?

Yes = 4

No = 0

Do you agree with the proposed mineral sites identified in the plan?

Yes = 2

No = 1

Do you agree with how we have identified safeguarded areas for sand and gravel, clay and limestone?

Yes = 1

Do you agree with our criteria for when proposed development will need to comply with Policy 1?

Yes = 1

Do you agree with focusing waste management around the main urban areas?

Yes = 2

Do you agree with the use of the identified employment areas and new development for the area of focus within Policy 14?
Yes = 1