

Buckinghamshire Minerals and Waste Local Development Framework

Schedule of Responses to Core Strategy Development Plan Document Issues and Options Consultation Report

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Mr Donald Stewart Davies	400003	3iv	Distance - reduce road/rail journeys.	It should be acknowledged that at some stage of delivery, road transport will be involved. This is the least sustainable means of transport when compared with rail and water. The County Council will therefore identify rail depots and wharves where this is feasible. However such opportunities are scarce within Buckinghamshire, and it is likely that the majority of mineral and waste carried will continue to be moved by road. The Council therefore considers that greater sustainability is most likely to be achieved through proximity.
		5iii	Distance	Noted.
		5iv	Percentage	The Council will encourage as far as possible C&D reuse and recycling facilities in conjunction with County matter applications in order to meet regional targets.
		6v	Would need assessment as to other alternatives: thought given to location of raised sites.	The Council does not agree. There is a presumption that landraising will not only be acceptable "unless there is a demonstrable gain in benefits sufficient to outweigh harm arising from the proposal" (BM&WLP, Policy 18).
		7iv	Location and ease of use.	Accepted.
		12iv	Financial incentives	Noted. Guidance for restoration and aftercare schemes will be provided in the future Supplementary Planning Document.
		12v	Should be adequate local consultation - use lowest tier of local government - i.e. Parish/Town Councils.	Agreed – this conforms to the methods of engagement outlined in the Council's Statement of Community Involvement.
Bierton with Broughton Parish Council	400005	15	Bierton with Broughton Parish Council does not have any mineral abstraction sites within the Parish and consider that those parishes with such facilities should be the ones that respond to this document.	Noted.
The Marlow Society	400006	2biii	Actively seek new technologies that provide improved, economically viable, methods of waste processing.	Comment noted, however it is not the role of the Core Strategy to actively seek new technologies but provide possible allocations that allow for a range of possible waste management facilities in conjunction with one another.
		6v	Create elevated sites that can ultimately be used for social benefit. Use as landscaped adventure parks and cycle tracks.	The Council has identified a surplus in its landfill capacity through the Plan period, therefore any new voidspace either through identification of new sites or landraising will not be required.
		7iv	Making the creator of waste pay for the full cost of its processing in to non hazardous format and final disposal.	Noted.

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		10ii	(Yes) But greater distances, double those given, if dust is expected to travel further than the given distances.	The Council will provide detailed development control policies for mineral and waste development in the respective mineral and waste Development Plan Documents and guidance for planning applications in its future Supplementary Planning Document.
		10iv	For long term sites, the planting of trees at the start of the extraction to provide an increasing barrier and a long term environmental gain.	Agreed. Such methods are already encouraged by the County Council.
		12iv	By selling the land, subject to its restoration to an agreed standard.	Noted.
		12v	Equally with the Planning Authority and the landowner.	Noted. The Council will publish a Supplementary Planning Document which will provide advice to applicants and communicating with local communities, in conjunction with the existing Statement of Community Involvement.
		13vi	All developments should be waste cost neutral. The cost of the disposal of all waste created by development should be borne by the developer - commercial or domestic.	Noted.
		14ii	SA21. Calculate the cost benefit of the installed technology - the energy reclaimed vs the annual operating cost and capital depreciation. Examine all other and new technology installed and operated by other Authorities in the UK and overseas, in conjunction with other Local Authorities, and assess their potential cost benefit and applicability.	Noted. It will be the role of site operators and contractors to assess the economic and recovery benefits of any proposed facility. The County Council will encourage as much energy recovery as possible.
Ms Carol McKearney	400007	3iv	Price/transport/proximity to growth sites taking into consideration wear and tear costs of roads/rail links.	It should be acknowledged that at some stage of delivery, road transport will be involved. This is the least sustainable means of transport when compared with rail and water. The County Council will therefore attempt to identify rail depots and wharves (on the Grand Union Canal) where this is feasible.
		14iii	The above plus household surveys.	Comment noted.
		15	The Springfield Farm site is far too close to the built up area of Beaconsfield.	Comment noted and considered in response to those received from the Waste DPD Preferred Options consultation (June 2007).
Mr Andy Tidey	400010	15	The proposed development in Aston Clinton is highly inappropriate. The proposal will lead to significant additional traffic flows, the site is located too close to an existing settlement and the proposed incinerator chimney will be a significant visual intrusion. This proposal should be overturned.	Aston Clinton will no longer be considered for recovery technology in the Core Strategy DPD.
Ms Bianca Dexter-Burnell	400011	2av	More use of recycling - my tins and glass containers don't currently get collected. Also why do we not recycle plastic? Households should be fined for not recycling their waste.	The Waste Management Strategy provides the approach to kerbside collection of recyclable materials for all districts.

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		3iv	The development of the area should not be constrained by lack of resources but where possible it should be self-sufficient and minimise the impact on the environment.	The Council will encourage the most sustainable use of resources and where possible the provision of resources proximate to growth areas. The Council will however encourage the provision of aggregate rail depots and wharves where such proximate resources are not available.
		7iv	Away from built up areas and green belt land.	The Council will not be identifying hazardous waste facilities in the MWCS Preferred Options consultation report. This will be addressed in the submission draft of the Waste DPD.
Northamptonshire County Council	400012	15	<p>End Date of the Core Strategy (Issue 1): For the purposes of giving a clear framework for minerals and waste investment across the Milton Keynes and South Midlands Sub-Region, it would be appropriate for the core strategy to have an end date of 2026-this would be the same end date as our emerging core strategy.</p> <p>Supply of Aggregates-Spatial Implications (Issue 3): The Issues and Options paper raises matters in relation to the implications of growth in the north of the county but where there are issues of lack of identified mineral resources. There is an implication that this mismatch could lead to the need to look outside of the county for provision. The case for this would have to be robustly made and evidenced if this was to over-ride the requirement to meet apportionment figures, and we believe this would therefore be unachievable. It is clear that we would not be able to provide any of the shortfall in your resources as we are already finding it challenging in identifying provision for our own needs; however we are working on developing a spatial strategy to ensure we do our best to meet our apportionment.</p> <p>Although not yet published the BGS South Midlands Study, and which is undertaking borehole testing at selected locations in the study area, may be finding that north-west Buckinghamshire could be a more productive area than previous work and interest has suggested. If so this could help meet the gap in provision between growth location and mineral resources in Buckinghamshire. The alternative would be to move extraction in to areas where an element of safeguarding has previously applied, such as river valleys.</p>	<p>Agreed. The Core Strategy will have an end date of 2026, in line with the emerging South East Plan.</p> <p>The Council will aim to meet its apportionment of 0.99 mtpa. The Council will also look to identify aggregate rail depots and/or aggregate recycling facilities near or proximate to the growth areas of central and north Buckinghamshire in its aim to be as self-sufficient as much as possible in the provision of materials to the growth areas.</p> <p>The comment is noted and will be taken into account when formulating policies for inclusion in the Preferred Options Consultation Report.</p>

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			<p>Hazardous Waste Provision (Issue 7): We would support the provision of hazardous waste capacity within Buckinghamshire and the Thames Valley area, as this would reduce the need to use the hazardous waste disposal facility in north-east Northamptonshire, and which is currently the only such site in the East Midlands and East of England regions.</p>	<p>The Council will not be identifying hazardous waste facilities in the MWCS Preferred Options consultation report. This will be a task for the Waste DPD.</p> <p>The Council supports the work of SERTAB in examining hazardous waste on a regional basis. It accepts that WPAs are unlikely to ever be self-sufficient in managing the range of their own hazardous waste arisings. It is likely that provision will eventual take a "sub-regional" pattern to accord better with the requirements of proximity.</p>
South East England Regional Assembly	400013	15	The Assembly has no substantive comments to make on this document but would expect your documents to be in general conformity with the current Regional Spatial Strategy (RPG9) and also take account of the emerging Draft South East Plan.	Agreed. The Core Strategy Preferred Options consultation report will be inline with current and emerging Regional Spatial Strategy.
Haddenham Parish Council	400014	15	Haddenham Business Park - noted inclusion as a "Safeguarded Area". Outline planning permission has already been granted for development for industry.	Haddenham Business Park is not being carried forward in the Core Strategy DPD for the location of strategic waste management facilities.
Chilterns Conservation Board	400016	15	<p>Duty of Conservation Board: 1. This response starts with the premise that the Chilterns Conservation Board (the Board) has a duty to conserve and enhance the natural beauty of the Chilterns Area of Outstanding Natural Beauty (AONB) and to increase the understanding and enjoyment by the public of the special qualities of the AONB, whilst also fostering the economic and social well being of communities within the AONB. Any development that takes place within the Chilterns AONB should conserve or enhance the natural beauty.</p>	Noted.
			<p>Response of the Chilterns Conservation Board: 2. The Board welcomes the recognition given to the Chilterns AONB (paragraph 2.1) in the county context.</p>	Comment welcomed.
			<p>3. The Board welcomes the fact that the saved policy from the adopted minerals and waste local plan which addresses the Chilterns AONB (Policy 24) will form part of the Core Strategy DPD. The Board recommends that any reference to development affecting the AONB and its setting should 'conserve and enhance the natural beauty' of the AONB in accordance with the Countryside and Rights of Way Act 2000 and PPS7.</p>	Noted. Such consideration will be including in formulating the Core Strategy DPD. The policies and proposals outlined in the Core Strategy will be assessed, amongst others, against SA8 which states, "To conserve and enhance the quality and distinctiveness of landscapes and townscapes, in particular within the AONB".

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			4. Sustainability objective SA8 deals with landscape and townscape and states that the objective is 'to conserve and enhance the quality and distinctiveness of landscapes and townscapes, in particular within the AONB'. This is welcomed and supported as drafted. The other objectives are generally welcomed and supported.	Support welcomed. Please also see response to point 3 above.
			5. The Council asks if it should look to the objectives of the Community Strategy in developing the vision and which objectives would be appropriate (Q2a (i) and (ii)). The Board recommends that the Community Strategy should provide a clear direction for the vision and objectives and the objectives and outcomes that the Board considers relevant are those related to the natural environment, particularly the countryside.	Agreed. The Council will consider the Community Strategy in the production of the Minerals and Waste Core Strategy DPD Preferred Options consultation report.
			6. The Board welcomes and supports the existing waste and minerals planning objectives, particularly those designed to ensure protection of the natural heritage in Buckinghamshire (W9 and M8) and support for the Chiltern brick industry (M6). The Board would prefer to see specific reference in W9 and M8 to the Chilterns AONB and the need to conserve and enhance the natural beauty of the AONB.	Support welcomed. The Council will look continue to include objectives or support for protection of the natural heritage and Chiltern Brick Industry in formulating the Core Strategy DPD. Please also see response to point 3 above.
			7. In connection with the issue of supply of aggregate for future growth (Issue 3) the Board considers that the County Council should strive to be self-sufficient in meeting aggregate for development in the growth areas, though this should not lead to huge increases in transport of materials from one end of the county to the other. The use of imports that are from closer to the areas of development, thereby reducing vehicle miles, should receive proper consideration. Greater use should also be made of materials recycled within the county where this is appropriate.	Agreed. The Council will aim to be self-sufficient in its supply of aggregate to meet the needs of the growth areas through identifying the provision of aggregate rail depots and wharves for possible inter-county movements of primary materials and so far as possible, encourage the use of secondary/recycled aggregate facilities on sites close to proximity of growth areas.
			8. Issues 6 and 7 deal with landfill and the management of hazardous waste. In connection with both of these issues the only comment that the Board wishes to make is to ensure that new facilities avoid the Chilterns AONB and its setting and only after any proposed development, which should be only local and small in scale, satisfies the need to conserve and enhance the natural beauty of the AONB should any new facilities be considered appropriate.	The Council will not be identifying hazardous waste facilities or additional landfill, in the Minerals and Waste Core Strategy DPD Preferred Options consultation report. These matters will be addressed in the Waste DPD.

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			<p>9. Table 4, in Issue 8 (designated sites of national, regional and local importance), lists a series of international and national sites of importance. The Board considers that the Chilterns AONB should be added to the series of sites of national importance as it is designated at the national level under Acts of Parliament. The Board considers that the resultant policy that addresses the Chilterns AONB should incorporate text to ensure that any development satisfies the tests outlined in PPS7 and 'conserves and enhances the natural beauty' of the AONB (to accord with the Countryside and Rights of Way Act 2000 and PPS7). In addition, the implications for the tranquillity of the AONB should also be addressed. This should also be considered in response to Issues 9 (protection of amenity) and 10 (buffer zones, where buffer zones should be provided).</p>	<p>Paragraph 9.3 of the Core Strategy Issues and Options report refers to MPS1 and which states mineral extraction cannot be permitted unless in exceptional circumstances on sites including Areas of Outstanding Natural Beauty. The Council recognises the importance of protecting the Chilterns AONB from minerals and waste development and will endeavour to do so through environmental policies throughout the MWLDF.</p> <p>Please also see response to point 3 above.</p>
			<p>10. The sustainable transport of waste is dealt with in Issue 11. The Board suggests that waste facilities should be developed as close to where the waste arises and should preferably be served by transport modes other than road. If remote locations that are served by transport modes other than road are proposed any development should be conditional on waste arriving by the alternative means of transport other than road.</p>	<p>Agreed. The Council will always encourage so far as possible alternative modes of transport to road delivery. However, it does recognise that identifying appropriate sites will require some delivery by road, emphasising the need for facilities to be proximate to waste arisings.</p>
			<p>11. Restoration and after care are considered in Issue 12. The Board considers that restoration and after care should be planned to provide benefits to the wider local area as the effects of minerals and waste developments will often have been felt over a wider area than the immediate site. Such benefits should address all aspects including economic, social and environmental. Restoration to agriculture should be to the same grade as existed before. The Council should seek to ensure, through the planning process, that any un-restored land is brought back into use, and in so doing should involve the local community in the decision-making process.</p>	<p>Comment welcomed and will be considered in formulating the detailed minerals and waste development plan documents.</p>
			<p>12. Issue 13 deals with planning obligations and developer contributions. All restoration and after care should be undertaken at the expense of the developers of minerals and waste sites and the Council should secure any necessary contributions prior to development taking place.</p>	<p>Comment noted and will be considered in producing a future Supplementary Planning Document (SPD).</p>
<p>Ms Susan</p>	<p>400017</p>	<p>2biii</p>	<p>I think the siting is all important e.g. Hedgerley would be badly affected.</p>	<p>Noted.</p>

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Berks, Bucks & Oxon Wildlife Trust	400018	2bii	W9 and M8 should include not only protection of 'natural heritage', but also enhancement. This relates specifically to biodiversity: both PPS9 and policy NRM4 of the emerging SE Plan look for biodiversity enhancement as well as protection. It would be clearer to have separate objectives for the 'nature' and 'culture' elements.	Agreed and will be considered in formulating the Core Strategy DPD. The Council will wish to see a positive approach to enhancing biodiversity (perhaps by linking up or extending existing designations).
		3iv	Should consider the impacts of extraction on biodiversity outside of the county.	Noted. Where appropriate, the Council will consult with neighbouring authorities on all mineral and waste allocations and applications to ensure potential impacts for neighbouring authorities have been included in the decision-making process.
		14ii	SAS - Core output indicators are specified in 'Local Development Framework Monitoring: a Good Practice Guide' (March 2005). Those identified for biodiversity are: Change in areas and populations of biodiversity importance, including: (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance.	Noted. The Council will consider the Core Output Indicators (COI) in developing the MWLDF monitoring framework.
		14iv	With regard to biodiversity: - local Biodiversity Action plan targets - data from the Bucks and Milton Keynes Environmental Records Centre (BMKERC).	Noted. The Council has included data provided from the BMKERC in its baseline for sustainability appraisal and updating the area statements. BAP targets will be considered in the production of the MWLDF monitoring framework.

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		15	<p>Issue 8: Designated sites of national, regional and local importance</p> <p>It is unclear what some of the 'locally-important environmental areas for Buckinghamshire' listed under this section are. It would appear that the list does not include Local Sites (known County Wildlife Sites and Biological Notification Sites in Buckinghamshire), which are selected at a County level for their importance for nature conservation. It may be that these are intended to be included within 'Areas of Conservation Importance'. However, this should be clarified, and inclusion of the definition of all the site designations within the glossary would be helpful.</p> <p>Greater clarification would be achieved through separating some of the issues considered under the broad heading of 'Environmental Protection'. It is difficult to make an objective comparison of the strength of protection needed for sites designated for their biodiversity interest against, for example, those designated for their cultural interest.</p> <p>With regard to 'locally important areas' for biodiversity and geological conservation; these are defined in PPS9 as Regionally Important Geological Sites, Local Nature Reserves and Local Sites (the latter of which, in Buckinghamshire, are referred to as County Wildlife Sites and Biological Notification Sites).</p> <p>PPS9 also identifies 'ancient woodlands and other natural habitats', and 'networks of habitats' as biodiversity features which should be protected and enhanced through the planning system.</p> <p>The protection that should be given to these is indicated within PPS9: RIGS, LNRs and LSs: 'Criteria-based policies should be established in local development documents against which proposals for any development on, or affecting, such sites will be judged.'</p> <p>Ancient woodlands: 'Local planning authorities should not grant planning permission for any development that would result in its loss or deterioration ...unless the need for, and benefits of, the development in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also</p>	<p>Noted. Will be included in the glossary for submission stage.</p> <p>Comments noted and will be considered in formulating the Core Strategy.</p> <p>The Council will want to see a positive and proactive approach to these matters in subsequent planning applications. Comments also noted for consideration in the future respective Minerals and Waste DPDs which will include detailed development control policies for mineral and waste developments.</p> <p>Accepted.</p> <p>Accepted.</p> <p>Accepted.</p>

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			<p>Issue 10: Buffer Zones This section talks about the need to ensure protection of the 'amenity of sensitive receptors'. There is also a need to ensure protection of the biodiversity of sensitive receptors (such as designated sites and BAP habitat) - the need for buffer zones between these and mineral and waste development should also be considered here.</p> <p>Issue 12: Restoration and Aftercare In developing policy for the restoration and aftercare of mineral extraction and waste management sites, the County Council should take into account the need to maintain and create a network of habitats. This can help ensure that habitats and species are more resilient to the increased pressure from development, and also that they are better able to adapt to climate change. Restoration to nature conservation after-use of mineral extraction and waste development sites can help contribute to habitat networks.</p> <p>The County Council should take into account the Biodiversity Opportunity Areas that are being developed by the Bucks and Milton Keynes Biodiversity Partnership. This is in line with guidance in PPS9, which states: 'Local authorities should take an integrated approach to planning for biodiversity and geodiversity when preparing local development documents. They should ensure that policies in local development documents reflect, and are consistent with, national, regional and local biodiversity priorities and objectives (including those agreed by local biodiversity partnerships).'</p> <p>Where mineral extraction and waste management sites fall within biodiversity opportunity areas, it should be ensured that restoration and aftercare is consistent with the aims of the biodiversity opportunity area.</p>	<p>The Council will consider the need for appropriate buffering for mineral and waste development at application stage. Detailed development control policies and guidance for buffer distances in respective mineral and waste development plan documents and supplementary planning document.</p> <p>Agreed. The Council recognises the need for high standards of appropriate restoration and, where possible, create and improve existing networks of habitats on allocations made throughout the MWLDF.</p> <p>Accepted.</p> <p>Accepted. The Council will want advice on appropriate restoration and aftercare (and, where relevant, mitigation). It will wish to see a proactive and positive approach to these matters by applicants. The Area Statements contained in the MWCS will set out principles.</p>
General Aviation Awareness Council	400019	15	On behalf of General Aviation Awareness Council we ask that Policy 34 of the present Minerals and Waste Local Plan is continued in order to safeguard the interests of General Aviation in particular Denham Aerodrome .	Comment noted and will be considered in the preparation of the respective detailed Mineral and Waste Development Plan Documents.

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Westcott Parish Council	400020	3iv	To keep to a minimum the amount conveyed by road transport.	The Council will encourage the use of alternative methods of transport other than road, however it does recognise some need for transportation of minerals and waste, emphasising the importance of proximity in reducing road mileage.
		6v	As a last resort only.	The Council has identified a surplus in its landfill capacity through the Plan period, therefore any new voidspace either through identification of new sites or landraising will not need to be considered.
		12iv	Grants	Noted.
		12v	Local views should be considered and given weight according to their positiveness.	Comment noted and will be considered in the production of the respective mineral and waste DPDs and supplementary planning document, in conjunction with consideration with the methods of community engagement outlined in the Statement of Community Involvement.
Radnage Parish Council	400021	15	Radnage Parish Council do not wish to respond.	Noted.
Bradenham Parish Council	400022		Bradenham Parish Council do not wish to comment.	Noted.
Ibstone Parish Council	400023	15	Ibstone Parish Council do not wish to respond.	Noted.
Fulmer Parish Council	400024	2av	Conservation and protection are key issues.	Accepted. Environmental conservation and protection will be considered in the formulation of the Core Strategy spatial vision and objectives and assessed through the Sustainability Appraisal.
		2bii	W6 Unease that bucks should have to deal with waste from outside the County. All the other objectives are OK.	Noted. Regional guidance states waste planning authorities should look to provide capacity for a decreasing amount of residual waste from London.
		5iii	Recycling and reuse of C&D waste must be a condition of all planning applications. Monitoring of compliance would be essential.	The Council will encourage districts to apply conditions or guidance for the reuse of C&D waste in new developments and the use of a waste audit for all developments through their LDFs.
		5iv	Presumably the Pathfinder project will improve liaison & ensure a wider range of information is available.	Noted.
		6v	Maximum height to be determined by nearby residences, i.e. it must not tower above them unless suitably screened. Restoration of site on completion must be specified without ambiguity.	Noted. The Council has identified a surplus in its landfill capacity through the Plan period, therefore any new voidspace either through identification of new sites or landraising will not need to be considered.
7iv	Viable quantities for processing. Site must be suitable for very high temperature incineration.	The Council will not currently be identifying hazardous waste facilities, however comment noted for future consideration.		

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		10v	Landscaped bunds to the height of the proposed facility (excluding incinerator towers).	Noted. Bunds are already a considered form of screening, the height of which is considered at application stage in conjunction of consideration of an appropriate buffer distance.
		12iv	Strict monitoring during the 5 year period and subsequently. Determined enforcement of remedial requirements.	Monitoring is already undertaken by the County Council's monitoring and enforcement team.
		12v	At least 50%	Comment noted. The Council will publish a Supplementary Planning Document which will provide advice to applicants and communicating with local communities, in conjunction with the existing Statement of Community Involvement.
		14ii	All matter, but concentrate on SA1,2,3,6,7,10,11,16	Noted. Comment considered in the development of the MWLDF monitoring framework.
		15	There is local concern about further development at Wapseys Wood after the current consent expires. This requires ultra sensitivity in handling and in meeting objections as far as possible. Please ensure Glossary is complete. Us laymen have a struggle when terms/abbreviations are not included ...	Comment noted. Agreed. The Council will include a complete glossary in the Core Strategy DPD.
Environment Agency	400025		We feel that our response to the issues and Options document that we sent to you recently covers all our issues with this document. As such, we have no further comment to make regarding the consultation report.	Noted.
EEDA	400027	15	EEDA receives a number of requests of this kind as a statutory consultee and on this occasion, EEDA has no comments to make on the document.	Noted.
Hedgerley Parish Council	400028	2avi	That there are economic deposits which should never be extracted because of environmental factors such as those listed in 9.7. Gravel is not a limitless resource in Bucks and extracting all economic deposits should not be an objective.	The Council will aim to meet its apportionment with the least cost to the environment. Any environmental designations that have or are effected by mineral extraction will only be temporary.
		2bii	Strengthen M8 and W9 to fully protect sensitive sites from extraction and waste development. The definition of sensitive sites should be those with either international, national or local importance.	Noted. Regional guidance states waste planning authorities should look to provide capacity for a decreasing amount of residual waste from London.

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		3iv	<p>1) Environmental factors such as the long term protection of designated environmental sites within the county, to prevent their eventual loss through extraction.</p> <p>2) The availability of aggregate from sources closer to the growth areas in the north of the county in order to reduce road transport movements.</p>	<p>The Council will aim to meet its apportionment with the least cost to the environment. Any environmental designations that have or are effected by mineral extraction will only be temporary.</p> <p>The Council will look to be self-sufficient in its provision of primary sourced materials to the growth areas. The Council will aim to provide aggregate rail depots and wharves in close proximity to the growth, allowing for potential inter-county movements or imports of materials to the growth areas.</p>
		12v	An equal share along with the developer and the planning authority. The Parish Council should be the channel of community involvement.	It is agreed the Parish Council should be the channel of community involvement. The Council will publish a Supplementary Planning Document which will provide advice to applicants and communicating with local communities, in conjunction with the existing Statement of Community Involvement.
Waste Recycling Group Limited	400029	1	The plan should make provision for the period to 2026 as this is compatible with the RSS.	Agreed. The end-date for the Core Strategy DPD will be to 2026 in accordance with the emerging Regional spatial Strategy.
		2a	<p>Paras. 1 & 2 of PPS10 set out the two overarching principles of Government Policy, i.e.</p> <p>1. The introduction of sustainable waste management practices.</p> <p>2. The delivery of facilities to achieve that. The wording of both the Community Strategy and the sustainability objectives is more geared towards sustainability than delivery. It is important that the Council has regard to both of these principles in setting out its vision.</p>	<p>Agreed. The Council will consider the Community Strategy and SA objectives in developing the Spatial Vision. Furthermore the Council will apply the sustainable waste principles in the Core Strategy DPD.</p> <p>The MWCS Preferred Options will have regard to sustainability <u>and</u> deliverability. The Council does not accept that these concepts need be exclusive.</p>

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		2b	<p>All of the objectives remain relevant, but two modifications are required:</p> <ul style="list-style-type: none"> • W6 is consistent with PPS10 which requires WDAs to plan having regard to neighbouring sub-regions. However, it fails to recognise (though acknowledged later in the document) that, in this case, particular regard needs to be had to the need to provide capacity for waste exported from London in accordance with the emerging SE Plan. • W5 should recognise that the proximity principle has regard to the mode of transport and that, for example, transport over longer distances may be more acceptable where the waste is conveyed by rail. 	<p>Agreed. The Core Strategy DPD will need to consider the provision of landfill capacity for an on-going but decreasing amount of waste from London in accordance with emerging RSS.</p> <p>It is accepted that where transportation of waste is over long distances, alternative modes of transport such as rail are far more sustainable and deliverable. However it is also recognised such methods might not be practically implemented.</p>
		3-5	No comments.	Noted.
		6	<p>The plan will need to make continued provision for the landfilling of all non hazardous waste residues arising from within the County, or from outside (where this is consistent with the Regional Plan), initially untreated and thereafter treated, for such time as it takes alternative facilities to be developed and brought on line.</p> <p>As an aside, it should be noted that the estimates in table three are based on out of date information and should be reviewed as part of the plan process.</p> <p>With regard to landraising, the plan should recognise that landfill sites must be designed to achieve restoration contours that achieve the minimum slopes recommended in Government guidance and that, in turn they must be surcharged over and above this to allow for the predicted amount of settlement. In particular policy 19 in the adopted Minerals and Waste Local Plan, which recognises that this is a particular issue at Calvert Landfill Site, should be retained having been tested and inserted into the plan via a public inquiry.</p>	<p>The Council has identified a surplus in its landfill capacity through the Plan period, therefore any new voidspace will not be required. Nevertheless some additional capacity will result from the identification of new mineral sites in the Minerals DPD.</p> <p>The Core Strategy DPD does recognise there will be a requirement for landfill capacity throughout the Plan period. Estimations will continuously be reviewed and updated throughout the production of the Core Strategy.</p> <p>Comments will be noted for future consideration in the detailed respective Mineral and Waste DPDs. This is an issue that will need to be considered at application stage.</p>

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		7	Further research and investigation will be required to determine the level of hazardous facilities in the region. However, in as much as a demand is likely to exist, which needs to be met on a regional or inter-regional scale, it should be noted that Calvert landfill site is ideally suited for the creation of a hazardous waste cell given both land availability, the suitability of the geology, operational requirements and environmental considerations.	The Council supports the work of SERTAB in examining hazardous waste on a regional basis. It accepts that WPAs are unlikely to ever be self-sufficient in managing the range of their own hazardous waste arisings. It is likely that provision will eventually take a "sub-regional" pattern to accord better with the requirements of proximity.
		8	The impact on locally-important environmental areas is obviously a relevant planning consideration. However, decisions should be made having regard to the degree of impact, the alternative options available and the level of mitigation that can be provided.	Agreed.
		9	The list of amenity considerations will be the same for both temporary and permanent facilities. In most cases, the objective will be to meet recommended criteria (e.g. as set out in Government guidance on noise or dust) regardless of the time scale involved. However, in balancing out the need for the development against any environmental impacts (as the planning system is required to do), the length of the operation may be a relevant consideration.	It is agreed such considerations will be considered at the detailed application stage, considering the length of the operation and nature of proposed development. Detailed development control policies for such criteria will be provided in the respective Mineral and Waste DPDs.
		10	<p>The recommended stand-off distances appear to be generally acceptable, except that a buffer of 200m may not be adequate for a major landfill operation. It is suggested that this be increased to 300 metres and that the distances should generally be applied from the closest point of operations on the site. However, buffer zones should be treated with a degree of caution since each situation should be considered on its merits through EIA, having regard to critical factors such as the nature of the waste, the hours of operation, wind direction and the potential for mitigation.</p> <p>A policy should be included applying an identical principle to applications for new sensitive land uses adjacent to existing or permitted waste management sites. E.g. new housing developments should not be permitted within 300 metres of a landfill site. Such a policy would put the onus on the developer in such instances to demonstrate why a particular proposal should be regarded as an exception and would provide the waste operator with a sound basis on which to object to any such applications.</p>	<p>Existing buffer distances are indicative. Currently each proposal will present individual requirements based on various considerations such as the proximity to sensitive receptors and nature of the proposal. An appropriate buffer distance is based on such considerations.</p> <p>Comments will be noted for consideration in preparing the detailed Mineral and Waste DPDs and Supplementary Planning Document which will provide the development control policies for mineral and waste applications and appropriate indicative buffer distances, if these are still to be applied.</p> <p>Comment noted and will be considered in formulating the Core Strategy DPD.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		11	Minimisation of travel distance, proximity to the SHN and/or the use of sustainable modes of transport are all important considerations, but they must be weighed against the need for the development and the alternative options available.	The County Council has assessed such considerations in identifying its preferred options and strategic allocations for waste facilities which will be proposed in the Core Strategy DPD.
		12	Determination of the appropriate form of restoration should have regard to local amenity considerations, the viability of a particular land-use, economic factors and land-ownership considerations. The opportunities for other forms of development to provide for identified needs should not be ruled out, particularly where this would minimise the loss of green-field sites elsewhere.	Comment noted. The Council will publish a Supplementary Planning Document which will provide advice to applicants to communicating with local communities, in conjunction with the existing Statement of Community Involvement.
		13a	As acknowledged by paragraph 10.19, bonds or financial guarantees will not normally be appropriate. In terms of landfill sites, financial provision for restoration is already provided for under the site permitting arrangements.	Noted. Details relating to the restoration and aftercare of mineral workings will be provided in a Supplementary Planning Document.
		13b	Developer contributions are only appropriate where these are directly relevant to the development.	Noted.
		14	Government targets for landfill diversion and regional requirements for waste management capacity should form the basis for monitoring the waste element of the plan, with both being given equal importance. However, there is also a need to monitor supply and demand in the County, to ensure that the targets being used are realistic and that adequate provision is being made.	National and regional targets form the baseline with which the Core Strategy and the monitoring of its policies and proposals will be based. It is agreed annual monitoring of waste arisings and imports will be required, where possible, in order to monitor whether national, regional and local targets are being met and to ensure appropriate capacity is provided throughout the Plan period.
		15	No other comments.	Noted.
Milton Keynes Partnership	400030	15	MKP has no comments on the Chapters 3 and 4 which deal with the Sustainability Objectives or the Existing Minerals and Waste Planning Framework.	Noted.
			Chapter 5: General Issue We would concur with the County Council's view expressed in paragraph 5.4 of the consultation document that the Core Strategy DPD should cover the longer term framework to 2026. As your consultation notes this timescale would be compatible with the coverage of the Regional Spatial Strategy (the South East Plan).	Agreed. The Core Strategy will cover the period to 2026.
			Chapter 6: Spatial Vision and Objectives MKP has no comments on this section of the consultation document.	Noted.

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			<p>Chapter 7: Minerals MKP supports the Council's view that it should consider a strategy which meets the needs of the growth areas to the north of the County. In our view the Strategy should consider for example how provision for the possible expansion of Milton Keynes toward Newton Longville to the south west of the existing built up area should be accommodated and how "self-sufficiency" at the local level might be achieved. This is likely to require joint working with Milton Keynes Council, as the adjoining local authority, to ensure the co-ordination of supply between Bucks and Milton Keynes.</p> <p>With regard to Issue 3 -The Supply of Aggregates for Future Growth -the Strategy should therefore acknowledge the likelihood of longer term growth in the vicinity of Newton Longville as part of the planned expansion of Milton Keynes to 2031. MKP would agree that locally sourced aggregates offer a more sustainable option than transporting materials from the south of the County; the Strategy should therefore include a commitment to joint working with Milton Keynes Council and Milton Keynes Partnership on this issue should it prove necessary.</p>	<p>The Core Strategy acknowledges the growth area of Aylesbury and Milton Keynes and the need to identify rail depots within this area in order to import primary sourced materials. The County Council also recognises the need to identify sites to be used for temporary facilities for the recycling of aggregate, either at temporary rail depots, wharves or highway depots and at sites of major development or redevelopment throughout the county, in particular the growth areas where primary materials would require importation.</p>
			<p>Chapter 8: Waste MKP have no comments on this section of the consultation document.</p>	<p>Noted.</p>
Highways Agency	400031	15	<p>2. As you are aware, the HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network ... c</p>	<p>Comment welcomed.</p>
			<p>3. In the case of Buckinghamshire this relates to the M40, M25, and M4. Sections of the M4 and M25 are currently operating at or near capacity. Stress maps produced for the Regional Spatial Strategy (RSS) show that the sections near M4 Junction 7 and the M25 from Junction 14 to 17 are currently unable to cope with demand. There is a risk that additional traffic could compromise the safe and efficient operation of the SRN further.</p>	<p>Comment noted. A transport assessment will be undertaken to assess the potential growth/reduction in vehicle numbers to each of the sites to be allocated in the Core Strategy DPD.</p>

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			<p>Planning Policy</p> <p>4. The principle objective of this Core Strategy is to meet the minerals and waste challenges facing Buckinghamshire ... the Core Strategy must consider all dimensions including transport with due regard and diligence to planning policy.</p> <p>The DPD currently makes no reference to sustainable transport policy documents. The HA would like subsequent documents to make reference to Planning Policy Guidance 13: Transport, DoT Circular 02/2007, and DoT Guidance on Transport Assessment, March 2007. Guidance to aid sustainable transportation is set out in Planning Policy Guidance 13: Transport. The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to:</p> <ul style="list-style-type: none"> i) promote more sustainable transport choices for both people and for moving freight; ii) promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and iii) reduce the need to travel, especially by car. This guidance sets out the circumstances where it is appropriate to change the emphasis and priorities in provision between different transport modes, in pursuit of wider Government objectives. The car will continue to have an important part to play and for some journeys, particularly in rural areas, it will remain the only real option for travel. 	<p>Agreed.</p> <p>The Core Strategy will encourage sustainable alternative modes of transport for the delivery of waste and minerals where possible.</p>
			<p>5. This DPD must be supported by a robust and credible evidence base in order to meet the Tests of Soundness detailed in PPS12. The HA believes that an evaluation of transport impact should be conducted to establish such a base. ... Guidance on Transport Assessments produced by the DoT for further details. The evaluation should identify the impact of any additional trips generated, that development is sustainable, trips are managed, and the residual impacts that require mitigation works to be identified can be delivered. The earlier potential issues are identified and addressed, the more likely that a mutually satisfactory outcome can be found.</p>	<p>A transport assessment will be undertaken to assess the potential growth/reduction in vehicle numbers to each of the sites to be identified in the Core Strategy DPD. The Council will be grateful for further involvement from the HA in producing the assessment to ensure such considerations have been included.</p>

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			6. It would also be helpful if this evaluation were co-ordinated with other evaluation work being carried out by other Local Planning Authorities for their Local Development Frameworks ...	Noted. However the respective timetables may not always allow this.
			Section 2: Background to Issues and Options Challenges Facing Buckinghamshire 7. The HA support the council's objective to reduce the amount of waste being sent to the landfill through the provision of alternative recycling and recovery facilities. Any reduction in trip making by heavy vehicles (HV) will lessen stress on the SRN.	Support welcomed.
			Section 3: Sustainability Objectives 8. The HA support the Sustainability Objectives SA16 and SA17 (Transport and Access). However, the HA suggest that SA16 also includes the wording to "minimise impact on the Strategic Road Network (SRN)".	Comment welcomed and will be considered in formulating the Core Strategy DPD.
			Section 4: The Mineral and Waste Planning Framework National policy aims and targets - Minerals 9. The HA support any initiative to reduce road trips. Utilising rail, sea and inland waterways will reduce the stress on the SRN and fulfil the sustainability objectives.	Support welcomed.
			Section 5: General Issue 10. The HA would prefer the coverage of this DPD to be compatible with the Regional Spatial Strategy (i.e. to 2026) in order to conform with National and Regional Government guidance.	Agreed. The Core Strategy will cover the period to 2026.
			Section 6: Core Minerals and Waste Planning Spatial Vision and Objectives for the Minerals and Waste Development Framework 11. The HA support the sustainability objectives to develop their vision. Transport should be considered as a primary sustainability objective. 12. The HA support current policies W5 & M5 and would like to see these policies reproduced in the subsequent DPD.	Comment welcomed. Sustainability objectives will be considered in the preparation of the Vision for the MWLDF. Comment noted and will be considered in formulating the Core Strategy DPD.

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			<p>Section 7: Minerals</p> <p>13. The HA supports MPS1 that encourages mineral supplies to be sourced locally to fulfil the sustainability objectives, thereby reducing impact on the SRN.</p> <p>14. The HA would not support the Council to rely on imports from outside Buckinghamshire, which may lead to additional impacts on the SRN.</p> <p>15. The HA supports the Council to promote construction and demolition waste facility, so long as the potential impact on the SRN is identified, assessed and mitigated appropriately.</p>	<p>The Core Strategy will look to safeguard existing and any new rail depots identified in the Minerals DPD in order to encourage any imports, especially to growth areas where locally sourced materials are sparse, to be transported by rail.</p> <p>The views of the Highways Agency will be sought in the identification of suitable construction and demolition waste facilities.</p>
			<p>Section 8: Waste</p> <p>16. The HA support the policies that will reduce the amount of waste being sent to landfill sites and therefore minimise the potential impact on the SRN.</p> <p>17. The HA support initiatives to treat and dispose of Buckinghamshire's own waste. This will minimise the impact on the SRN. HA would not support a strategy to export waste for disposal or treatment.</p>	<p>Support welcomed. However the County Council recognises there will still be a requirement for waste to be disposed at alternative facilities delivered by road. The Core Strategy will identify a number of supporting waste transfer stations which will minimise, as much as possible, the amount of waste transported by road.</p> <p>Support welcomed. The Core Strategy will be based on a principle of self-sufficiency, providing principles, objectives and areas in order to manage Buckinghamshire's own waste arisings.</p>
			<p>Section 9: Environmental Protection</p> <p>18. The HA would suggest that the Council, when considering the location of sites, take account of the adverse potential impact on the SRN and allow for sufficient buffer zone distance. The criteria as shown in Table 5 of the DPD would be applicable.</p>	<p>Transport considerations form an important role in the site selection process in the identification of mineral extraction and waste management facilities. Indicative buffer distances will be considered in a future Supplementary Planning Document. However, buffer distances for all planning applications will be considered on a case-by-case basis considering such factors as potential routing and access.</p>

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			<p>Section 10: Development Control</p> <p>19. The HA support sustainable transport modes, which will be in line with the PPG13, and minimise the impact on the SRN. As stated in paragraph 10.7, the HA would like to see evidence to show that alternative methods such as rail, waterways, conveyers and pipelines are practicable and can be delivered. Sites which currently use alternative transport modes, such as the two rail aggregate depots at Aylesbury and Iver should be safeguarded and where necessary improved.</p> <p>20. The HA would encourage the Council to identify strategies to ensure developer contributions are sought in order to deliver the necessary works to mitigate the impact on the SRN.</p> <p>21. The HA would recommend the Council to identify strategies to set targets and sanctions in the subsequent DPD in granting planning applications.</p>	<p>The Core Strategy, Minerals DPD and Waste DPD will identify sites which will outline potential methods of access and transport modes to and from the sites.</p> <p>The Core Strategy will look to safeguard all existing and potential future aggregate rail depots. All depots will be identified in the Minerals DPD.</p> <p>Comments noted and will be considered in the preparation of the respective Mineral and Waste DPDs.</p>
Network Rail	400033	15	I do not have any comment to make on the Issues and Options Report.	Noted.
Gerrards Cross Parish Council	400034	2biii	<p>As far as possible, minimise activity on Green Belt land to extraction, and restoration at the earliest opportunity.</p> <p>Ancillary operations may be appropriate while extraction and filling is taking place, but not after that is finished.</p>	The County Council will seek the restoration of temporary mineral workings as soon as is practicable to an approved standard. It is recognised however the development of permanent waste facilities are not precluded from the Green Belt.
		3iv	Minerals should be drawn from the most cost effective places regardless in which County the workings are sited.	It is the role of the operator to identify which sites are the most cost effective. The County Council will assess all proposals for mineral extraction based on their impact on local communities and the environment.
		5iii	Where appropriate in giving conditional planning consents, to specify a minimum percentage of C&D materials to be used.	Comment noted. The Core Strategy will look to include a policy which will require a waste audit to accompany all major planning applications, including non-waste related development in order to demonstrate a sustainable approach has been adopted to construction and demolition and design.
		5iv	As above and if directly involved in projects retain a maximum amount of C&D for their own re-use.	Comment noted. The same comment applies as to question 5iii.
		6v	In the right circumstances, land raising has merit. Priority should be given to the correct depth of topsoil and drainage.	Noted. The Council has identified a surplus in its landfill capacity through the Plan period, therefore any new voidspace either through identification of new sites or landraising will not need to be considered.

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		7iv	<p>- Accessibility.</p> <p>- Not on Green Belt or rural sites.</p>	The Council will not currently be identifying hazardous waste facilities, however comment noted for future consideration.
		12iv	The availability of land for food or fuel production can only become more important. In this connection we should include forestry. Increasing composting could help initially by the free provision of this material. Sewage sludge has a limited value because of its analysis and heavy metal content.	Comment noted.
		12v	Consultation through LA's.	Agreed. This is one method of community engagement as identified in the Buckinghamshire Statement of Community Involvement.
		12vi	Much more care is needed in the building up of a good soil structure with the help of as much organic material as possible.	Comment noted. The County Council will look to a high standard of restoration, the detail and nature of which will be determined at the planning application stage.
		14ii	SA23 - The fulfilment of this objective should ensure that sufficient funds are available to properly restore sites.	Comment noted and will be considered in the formulation of the future Minerals DPD and/or Supplementary Planning Document.
		14iv	A full programme of progressive restoration should not only be part of the consent, but subject to penalties if not adhered to.	A restoration scheme will be subject to planning conditions. Enforcement action will be taken if the conditions are not fully adhered to.
Mr H.A.V. Wilson	400035	2av	<p>Buckinghamshire is too small to have its own Spatial Vision. This should be a joint project with a group of counties such as Bucks, Milton Keynes, Oxon and Berks.</p> <p>It may be convenient for the Bucks CC to prepare a joint Development Plan for Waste and Minerals, but the linkage is becoming weaker and weaker and they deserve separate studies.</p>	<p>PPS12 requires mineral and waste planning authorities (M&WPAs) to produce a spatial vision that sets out the vision for mineral and waste planning. Buckinghamshire is therefore required to have its own spatial vision. The Council will however consider adjoining MWPAs in producing its spatial vision.</p> <p>There are overlapping considerations between mineral and waste planning which require the same planning requirements and considerations within a Core Strategy. However, detailed development control policies and site allocations for mineral and waste sites will be provided in the separate respective Minerals and Waste DPDs.</p>
		2avi	Same as (V).	Noted. Please see comments to (v)
		2bii	W6, particularly, needs a sub region approach so that geographical, transport and location of large communities are more important than county boundaries.	The Core Strategy will consider the plans and strategies of adjoining mineral and waste planning authorities in producing its preferred options.
		2biii	M5 should be strengthened by a policy to increase the capacity of waterways to move minerals and waste by widening canals and enlarging locks on canals and the Thames.	The Core Strategy can only encourage the use of such alternative sustainable modes of transport, not establish the detail of how such proposals are to be achieved.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		3iv	As stated earlier the determining factors for meeting the demands of North Bucks should not be the County boundaries but local geographical, transport and the location of large communities. It might be more effective to use South Bucks minerals in London, Heathrow Airport, Thames Valley rather than transport by road to North bucks.	The mineral industry will establish where demand for mineral is sourced. The Core Strategy will consider how the primary and secondary/recycled materials are to be supplied to growth areas of central and north Buckinghamshire where locally sourced materials are sparse.
		6v	I don't know what the BCC policy is on land raising but I would have thought that one land fill in the south is exhausted and/or to save transport of waste long distances, some local landraising on poor quality agricultural land or on already filled in holes could be permitted provided that they are properly landscaped.	There is a presumption that landraising will not only be acceptable "unless there is a demonstrable gain in benefits sufficient to outweigh harm arising from the proposal" (BM&WLP, Policy 18). However, the County Council has identified a surplus in its landfill capacity throughout the Plan period, therefore any new voidspace either through identification of new sites or landraising will not be required.
		7iv	These facilities must be away from residential areas, preferably where they will not spoil the landscape and where transport access is good. The technology in treatment/processing must ensure no air pollution or water pollution takes place. It might be better for few but large plants are sited in a sub-region of counties.	The Council will not currently be identifying hazardous waste facilities, however comment noted for future consideration.
		10v	High fences to deflect noise. Trees to obscure workings.	The County Council currently encourages such methods to be used. Comment is noted and will be considered in the preparation of the future Supplementary Planning Document.
		12iv	Legislation to require operators to restore land to a predetermined quality.	The proposed quality of restoration and aftercare will be required to be submitted with the application for mineral extraction. Planning conditions will be applied to ensure the land is restored to an agreed standard.
		12v	Consultation with local councils and amenity groups.	Agreed. These are two methods of community engagement as identified in the Buckinghamshire Statement of Community Involvement.
		12vi	Consultation with all interested parties including owners, amenity and conservation groups.	Agred. The Council encourages pre-application discussions with those likely to be affected by any proposal for mineral and waste development. All methods of community engagement are identified in the Buckinghamshire Statement of Community Involvement.
		13vi	106 Planning Agreements should apply to all proposed developments (including material enhancements and one off buildings) to provide funds for community projects.	Comment welcomed and will be considered in the preparation of a future Supplementary Planning Document.
		14ii	The targets chosen should be specific and measurable.	Agreed.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		14iv	Comparisons with other counties in the region, with other regions in the country and with other countries in the EU.	The County Council will be required to consider regional targets and indicators in the monitoring of the MWLDF.
		15	I would like to restate that this exercise should be conducted on a sub-region basis. There is a danger of being too parochial or even 'NIMBY' like if we only think of Buckinghamshire.	The Regional Spatial Strategy provides the framework for mineral and waste planning throughout the south east region which considers the overall implications for the region and each sub-region. Each MWPA is then required to produce its own MWLDF which considers impacts on adjoining authorities.
Beaconsfield Town Council	400036	2av	Good space for recycling should be included in apartment/flat developments within the planning process.	This is a consideration for the relevant district council.
		2avi	Materials should not be imported on to the site or re-processed and re-exported, particularly in a Green Belt site.	If there is an identified need which cannot be met other than within the green Belt, then such as possibility would need to be considered.
		2bii	Delete W6 - to meet objectives of S should not be importing waste into Buckinghamshire.	The Regional Spatial Strategy requires Buckinghamshire to receive a declining amount of imports from London only to landfill.
		3iv	Use geographical or geological regions or transport regions instead of County boundaries. The north/south transport networks in Buckinghamshire are poor and would not support this.	The Core Strategy will look to provide policy which safeguards existing and potential future aggregate rail depots, particularly for the growth areas of central and north Buckinghamshire.
		5iv	None	Noted.
		6v	No definition given of landraising.	Noted.
		7iv	Industrial areas also selected in iii) above. Away from residential areas and with good transport links (rail and/or water)	The Council will be identifying hazardous waste facilities in the MWCS. The will fall to the Waste DPD.
		10v	Yes should use appropriate landscaping and sound barriers - e.g. trees, foliage to protect local residents.	The County Council currently encourages such methods to be used. Comment is noted and will be considered in the preparation of a future Supplementary Planning Document.
		12iv	Legislation which must be enforced. Plans + innovation required from Bucks County Council.	The proposed quality of restoration and aftercare will be required to be submitted with the application for mineral extraction. Planning conditions will be applied to ensure the land is restored to an agreed standard.
		12v	Very important.	Noted.
		12vi	More discussions with local residents & take notice of the comments made.	Comment noted. The Council encourages pre-application discussions with those likely to be affected by any proposal for mineral and waste development. All methods of community engagement are identified in the Buckinghamshire Statement of Community Involvement.
13vi	Seek contributions from developers, however small the project.	Noted and considered in the future production of the Supplementary Planning Document.		
		14ii	All	Noted.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		14iv	Ask local community and their representatives.	Noted.
Beaconsfield Town Council	400037	2av	Planning applications for apartment blocks and small house development should include space for good recycling (as in Holland and Finland)	This is a consideration for the relevant district council.
		2biii	Actively discourage road transport for waste & minerals.	The Council will encourage the use of sustainable modes of transport such as rail, however, it does recognise there will always be a need for road transport of both minerals and waste. The Core Strategy will seek to minimise road transport where possible.
		3iv	Use geographical regions or transport regions instead of county boundaries. North South networks in Bucks are poor.	The Core Strategy will look to provide policy for the safeguarding of existing and potential future aggregate rail depots, particularly for the growth areas of central and north Buckinghamshire.
		6v	What is landraising? No description available.	Noted.
		7iv	Also selected Industrial Areas in iii) above. Not to use areas such as landfill which are expected to return to greenbelt or agriculture.	The Council will not currently be identifying hazardous waste facilities, however comment noted for future consideration.
		12iv	Planned amenity & sport facilities	Noted.
		12v	Much!! - to provide local missing amenities	Noted.
		12vi	Sites have been allowed to chance too much. Green belt extraction sites have become landfill sites. These are now threatened with EfW facilities. Thus greenbelt is reduced to industrial.	Noted. However, waste facilities are not precluded from the Green Belt if "very special circumstances" can be demonstrated.
		14ii	All.	Noted.
D.K. Symes Associates	400040	3iv	Minerals can only be worked where they occur. The arbitrary line of the County Boundary does not reflect the availability of mineral deposits. To supply the areas of demand, it may be more sustainable to import from elsewhere as the deposit may be closer, or can be developed with less impact. The approach must be to maintain flexibility. This should be considered in the overall context of mineral supply such that elsewhere Bucks, will be expected to export minerals.	The Core Strategy will look to provide policy for the safeguarding of existing and potential future aggregate rail depots, particularly for the growth areas of central and north Buckinghamshire.
		5iii	The District Council should require applicants to quantify the volume and types of waste expected and to provide a strategy to demonstrate minimisation and re-use. The recent draft paper 'Waste Plans' may override the need for Council involvement.	Noted.
		5iv	Same as above.	Noted.

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		6v	Principally to ensure the void space, particularly when engineered, is maximised within acceptable design/landscape criteria (especially drainage etc.)	There is a presumption that landraising will not only be acceptable "unless there is a demonstrable gain in benefits sufficient to outweigh harm arising from the proposal" (BM&WLP, Policy 18). However, the County Council has identified a surplus in its landfill capacity throughout the Plan period, therefore any new voidspace either through identification of new sites or landraising will not be required.
		7iv	The treatment of hazardous waste may require a site to handle more than the volume generated by Bucks to be economic. The approach should recognise this and accept hazardous imports if there is an appropriate site in the County.	The Council will not be identifying hazardous waste facilities in the MWCS. That will fall to the Waste DPD. The Council supports the work of SERTAB in examining hazardous waste on a regional basis. It accepts that WPAs are unlikely to ever be self-sufficient in managing the range of their own hazardous waste arisings. It is likely that provision will eventually take a "sub-regional" pattern to accord better with the requirements of proximity.
		10v	Follow Government Guidance and use a criteria/commonsense approach and avoid any prescriptive distances at all.	Existing buffer distances are indicative. Currently each proposal will present individual requirements based on various considerations such as the proximity to sensitive receptors and nature of the proposal. An appropriate buffer distance is based on such considerations.
		12iv	Restoration has to reflect the objectives of the landowner, if the long-term commitment is to be achieved. Also, the restored site should be designed to be self financing. The Government do not support the principle of money being obtained from the developer as this is little more than a local tax.	Noted.
		12v	Consultee.	Agreed. Already consulted as part of the planning process as outlined in the Statement of Community Involvement.
		12vi	There may be merit in looking at some form of Restoration Brief for areas that are subject of several workings. The Colne Valley Park is a good example, where a large proven mineral resource remains and there have been extensive areas of working.	Comment noted for future consideration in preparation of the future Minerals DPD and Supplementary Planning Document.

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		13vi	The whole approach to securing financial guarantees has been rejected by the Government generally and has not been supported by Inspectors at previous Plan Inquiries in Bucks. There is clear guidance on financial contribution in section 106 Agreements and the comments in the document and the questions are strongly suggesting that he who pays gets the permission. Also, there are very few examples to support the view that without a financial guarantee, the restoration will eventually fail. This whole section should be deleted.	Comment noted and will be considered in formulating the future detailed Mineral and Waste DPDs and/or Supplementary Planning Document.
		14iii	Many of the SA's are too subjective. Monitoring targets must be clear, for example level of permitted reserves, output, monitoring visits, breaches of conditions, applications, recycling data, disposal data, use of alternative transport etc.	Noted. Such targets will be considered in forming the monitoring regime for the MWLDF. It is agreed that certain targets will be required in order to provide a baseline target from which to assess the impact of the MWLDF.
		15	Q11. This question relates to waste only and ignores the opportunities for minerals to be moved by rail or water, both into or out of the County. If the County are genuine in the desire to use alternative transport methods, then sites that can receive waste (as well as minerals by rail or water should be encouraged to do so).	Agreed. Consideration for sustainable modes of transport will apply to both minerals and waste.
British Waterways London	400041	15	<p>British Waterways request that the document gives further emphasis to the need to provide active support for proposals that promote alternative modes of transport including water:</p> <p>Waterborne Transport and Waste & Minerals Waterborne transport has a role to play in reducing traffic congestion and providing alternative non-car modes of transport improving air quality. The waste plan should therefore give recognition to the role of the County's waterways for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport through waterborne transport.</p> <p>In the interest of sustainable development British Waterways encourages waterside sites to utilise their location for waterborne transport.</p> <p>In London, British Waterways is promoting the use of canals for freight transport, in accordance with Policy 4C.14 of the London Plan, and with TtL jointly</p>	<p>Accepted.</p> <p>Agreed. The Core Strategy will look to encourage sustainable modes of transport through the provision of policy which looks to safeguard rail depots and wharves where such possibilities for the more sustainable movement of minerals and waste may arise.</p> <p>Noted.</p> <p>Information welcomed and noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>commissioned Peter Brett Associates to assess the opportunities for the transport of waste, recyclates and construction materials on the West London Canal Network (WLCN). The report concludes that "there are relatively few sites along the network which can process or handle waste or recyclates, but there are opportunities to develop further facilities".</p> <p>This work revealed that in certain circumstances (depending on distance and number of locks required to travel through) there is a sound economic case (and environmental and social case) for considering freight by water as a viable alternative to road transport. Clearly, this offers benefits including reduced lorry miles, reduced congestion, reduced carbon emission and reduced number of HGV related accidents. Copies of the full report and the Executive Summary are available on the Transport for London website at: http://www.tfl.gov.uk/tfl/initiatives-projects/freightreport.shtml.</p> <p>There are a few operations currently underway involving for the movement of waste by water: A pilot scheme was trailed in Hackney known as Waste by Water (for domestic/ commercial waste report attached) which would have been successful but for the nature of the vehicles used to transport the waste as double or triple handling renders the use of the canal too inefficient.</p> <p>British Waterways London 1 Sheldon Square Paddington Central London W2 6TI T 020 7985 7200 F 020 7985 7201 E enquiries.london@britishwaterways.co.uk www.britishwaterwayslondon.co.uk www.waterscape.com Grand Union Canal Regent's Canal London Docklands River Lee Navigation River Stort Navigation</p> <p>However Powerday's (at Old Oak Siding, Willesden Junction, LB Hammersmith & Fulham -see www.powerday.co.uk), the waste handling company, are due to launch a new inter-modal vehicle which will improve the transfer of waste from road to barge and will make scheme such as this more viable. Powerday's also process construction waste into aggregates which can then be transported back out to development sites whether by</p>	<p>Noted.</p> <p>Noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>water, rail or road.</p> <p>BW has a contract with the London Waste Centre at Edmonton and is in dialogue with them about increasing the use of the canal to transport waste (including green waste for composting) and recyclables on the water. We understand the London Waste Centre has significant under-utilised capacity and are keen to see an increase in the use of the navigation for this purpose. BW would like to see the compost facility at the London Waste Centre moved adjacent to the River Lee Navigation or for a conveyor belt to be installed to make it more practical for the site to cope with green waste transported by barge. There may also be may also be an opportunity for compost to be delivered away from the site by barge.</p> <p>BW would like to see the core strategy encourage new waterside development schemes to be designed to enable collection of waste and recyclables from the water's edge which would simplify the use of the waterways for the movement of materials.</p> <p>In addition to transporting construction waste which has been recycled/ processed into aggregates, BW encourages the transport of building materials by water between waterside suppliers and development sites.</p> <p>Burdens, a construction material depot located at Pickett's Lock, have a yard of approximately 6 acres with a significant length of canal side frontage ideal for the transport of building materials to waterside sites, especially the Olympics and related regeneration areas in the Lee Valley, by barge.</p> <p>BW London, in conjunction with TtL, is currently reviewing the waterways to safeguard strategic wharves to ensure the navigation is accessible in the future for the range of purposes it may be required. With the road network becoming more congested BW believe that the canals offer an alternative and truly sustainable form of transport for freight and passengers that is not currently being utilised. BW is therefore promoting the use of the canals for freight transport, where viable, along the canals. At present the</p>	<p>Noted.</p> <p>Please see the first comment above.</p> <p>Noted. The study will be considered in producing the respective Minerals and Waste DPDs which will look to identify possible areas for such facilities.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>focus is on construction materials and waste where the source and destination of the materials are adjacent to the canal. For this potential to be realised it is vital that future developments are designed to enable the collection of domestic waste and recyclables which may then be transported to a waterside waste management facility. BW's Strategic Wharf Assessment is to be carried out shortly, the results of which shall be forwarded separately for consideration as part of the minerals and waste core strategy.</p> <p>"The control of dust and emissions from construction and demolition" best practice guidance published Dec 2006 by GLA, together with London Councils states:</p> <p>"Where construction sites are located near to waterways or railways it may be feasible for construction materials to be delivered or removed from the site using these means, rather than by road. The obvious benefit is that it will reduce the number of trips made by HGVs on local roads, therefore reducing local emissions and disturbance to sensitive receptors. This option is rarely used in London, but developers following this guidance, should try to make use of the waterways wherever possible."</p> <p>The Mayor's draft Freight Plan also seeks to encourage the use of waterways and rail in place of roads whenever practicable.</p> <p>Whilst a lot of this policy support, research and best practice case studies cited are London based given the close waterways connection between the London boroughs and Buckinghamshire we consider it is relevant and should be considered in the preparation of the waste plan for Buckinghamshire. BW therefore requests the waste plan acknowledges the positive benefits of transporting freight by water and its potential for transporting demolition and construction waste, construction materials, household and commercial waste, recyclates and other low value, bulky, non time sensitive goods and products.</p>	<p>Imports of waste to Buckinghamshire are already predominantly rail borne.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Walters Family	400043	2bii	W6 If we are going to meet SA16 & SA17 we should not be importing waste into Bucks.	The Regional Spatial Strategy requires Buckinghamshire to receive a declining amount of imports from London only to landfill.
		3iv	Can these be sourced from areas nearer to the north of the County. Road links from the south are not good and already overcrowded.	Noted.
		7iv	7 iii) Contaminated or derelict land and industrial areas. iv) Away from residential areas and with good transport (rail/water) links.	The Council will not currently be identifying hazardous waste facilities, however comment noted for future consideration.
		10v	Landscaping &/or fencing.	Such methods are already encouraged by the County Council.
		12iv	Legislation.	Noted.
		12v	Very influential.	Noted.
		12vi	More discussion with local residents - and then take notice of them.	Comment noted. The Council will publish a Supplementary Planning Document which will provide advice to applicants in communicating with local communities, in conjunction with the existing Statement of Community Involvement.
		13vi	Involve local residents.	Agreed. See response to 12vi.
		14ii	All.	Noted.
		15	13a) iv Should not deal with operators who have unsatisfactory records.	Noted.
		Mrs J Mills	400044	2av
2avi	Cost of long distance transport			The cost of transport mineral or waste is a consideration borne by the operator.
2biii	Waste received from outside Buckinghamshire, i.e. London			Buckinghamshire should provide capacity for a continuous but reducing amount of waste imported from London.
3iv	Large amounts extracted for Heathrow and further expansion of the Airport.			Noted.
7iv	Location. Should be far from habitation.			The Council will not be identifying hazardous waste facilities in the MWCS. This will fall to the Waste DPD.
12iv	Industrial use.			Noted.
12v	By agreement.			Noted.
15	Waste planning, including management and disposal should be located away from habitation centres. Council professionals should identify and locate accordingly.			The Council will need to consider the balance between identifying sites which protect the amenity of residents whilst being in proximate distance to waste arisings.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Mr Donald Stewart Davies	400045	2av	Population projections	The Council will consider the growth areas in producing the Minerals and Waste Core Strategy and population projections in estimating Buckinghamshire's waste arisings.
		2avi	Cost of long distance transport	The cost of transport mineral or waste is a consideration borne by the operator.
		2biii	Waste received from outside Buckinghamshire, i.e. London	Buckinghamshire should provide capacity for a continuous but reducing amount of waste imported from London.
		3iv	Large amounts extracted for Heathrow and further expansion of Airport.	Noted.
		7iv	Location should be distant from habitation centres.	The Council will not be identifying hazardous waste facilities in the MWCS. This will fall to the Waste DPD.
		12iv	Industrial use.	Noted.
		12v	By agreement	Noted.
		15	Waste planning, including management and disposal should be located away from habitation centres. Council professionals should identify and locate accordingly.	The Council will need to consider the balance between identifying sites which protect the amenity of residents whilst being in proximate distance to waste arisings.
Weedon Parish Council	400048	3iv	Selected ii) and iii) above - consider both options. iv) Cost, distance - transport, quality and impact on communities.	Noted. Noted.
		6v	Limited to poor quality land, re-contouring and with low impact on the environment.	Comment noted. However, the County Council has identified a surplus in its landfill capacity throughout the Plan period, therefore any new voidspace either through identification of new sites or landraising will not be required.
		7iv	7 ii) Selected both options. 7 iv) Security, technology to neutralise hazards.	Comments noted. The Council will not currently be identifying hazardous waste facilities, however comment noted for future consideration.
		12iv	Grants e.g. EU. Rate relief?	Noted.
		12v	Through usual planning channels	Accepted.
		14ii	All targets should be attainable, sustainable, measurable e.g. SA10 Water Quality, use WHO and other international standards.	Accepted. The Council will require a monitoring regime that includes targets applicable to the BM&WLDF and will be able to be monitored and updated regularly.
Mr Ian Lawson	400049	2avi	Waste management should not encroach on high density residential areas (or residential areas where it would make sense to enlarge as an alternative to building a waste management site)	The Council will not propose such sites.
		3iv	Other counties may have more suitable space in less dense residential areas.	Buckinghamshire is required to be broadly self-sufficient in managing its waste. It cannot rely upon exporting its waste problems to other areas.
		7iv	Maximum distance from high density residential areas.	The Council accepts the need for adequate buffering.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Buckinghamshire NHS Primary Care Trust	400052	15	<p>On behalf of Dr Jane O'Grady, Director of Public Health for Given the specialised nature of Minerals and Waste, the PCT has sought the expert advice of the Health Protection Agency (HPA). Based on this expert advice, the response of the PCT is as follows.</p> <p>The document outlines strategic minerals and waste aims and objectives for Buckinghamshire, taking in into account the need to produce minerals for national, regional and local requirements at acceptable social, environmental and economic costs, and to provide adequate provision of waste management in appropriate locations.</p> <p>It is not the role of this document to identify locations for mineral extraction and waste management facility. Buckinghamshire County Council will carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) at each stage of development. The Primary Care Trust, based on the expert advice they would obtain from the HPA, would be able to make comment on the SEA and potentially have an input at this stage of the process.</p> <p>At this stage there is little further comment that the PCT can make apart from continuing to say that it wishes to be kept included in the consultation. The PCT are not able to comment on the policies and strategies that the County Council are developing but will be able to assist with assessments of potential adverse public health effects with regards to nuisance (odour, dust and noise/vibration), air quality and water quality, using the source, pathway, receptor model.</p>	<p>Welcomed.</p> <p>Noted.</p> <p>The Council is now following advice from the Government Office for the South East (GOSE) that the MWCS should contain strategic waste allocations. The Preferred Options stage will therefore contain such sites. It will be fully supported by a Sustainability Appraisal/Strategic Environmental Assessment.</p> <p>The PCT's advice will be sought upon the health implications of other underpinning studies; for example, the Air Dispersion Modelling undertaken further to the Appropriate Assessment screening report.</p>
Grundon Waste Management	400053	2av	There needs to be an emphasis on education. It is not the waste industry's waste it is society's.	Comment welcomed.
		2bii	W8/W9 - this makes the presumption that waste management sites will have adverse impacts over and above all other developments. A well managed site would not.	The Council does not make this presumption. Nevertheless one of the purposes of waste planning is to reduce such impacts.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		2biii	Objectives of education in the need for waste and minerals sites. If waste was not produced it would not be managed. Public have not linked their way of life to the creation of waste, especially C&I waste.	The Council has an active waste awareness programme. It is seeking, not least in the MWCS and its consultation arrangements, to inform and educate people. The MWCS will stress the importance of personal responsibility for achieving diversion targets (for example, through reducing waste, reusing materials, and by sorting waste for recycling).
		5iii	Where suitable allow on site recovery.	Agreed.
		5iv	As above.	Agreed.
		6v	Where environmental conditions allow then landraising should be treated as any other application.	The Council does not agree. There is a presumption that landraising will not only be acceptable "unless there is a demonstrable gain in benefits sufficient to outweigh harm arising from the proposal" (BM&WLP, Policy 18).
		7iv	7 i) Look on a regional basis. ii) Both iii) Depends on site iv) Depends on waste - batteries will be different to heavy metal contaminated soil. Question too general.	The Council supports the work of SERTAB in examining hazardous waste on a regional basis. It accepts that WPAs are unlikely to ever be self-sufficient in managing the range of their own hazardous waste arisings. It is likely that provision will eventual take a "sub-regional" pattern to accord better with the requirements of proximity. Agreed, in principle (however see the answer to i) above. A cell located at a suitable landfill site is a more likely prospect than a hazardous treatment facility. Noted. Accepted. Facilities will need to specialise.
		13vi	Contributions for what? Do not assume minerals and waste operations will be cash rich.	The question relates to developers in general - for example, to housebuilders. Major new areas will be brought forward during the plan period - particularly at Aylesbury. It is reasonable to consider the extent to which these might contribute to waste infrastructure and facilities.
		Cemex UK Operations Ltd	400054	2avi
		3iv	None.	
		5iii	Normal planning criteria.	Noted
		5iv	Normal planning criteria.	Noted
		10v	Assess on a site specific basis.	Comment welcomed
		12iv	This is unlikely to arise in the future.	Noted
		12v	Should be consulted and have views taken into account.	This currently happens through site liaison groups
		12vi	None.	

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		15	Ensure in calculating the landbank the productive capacity of units is taken in to account as a constraint.	The calculation of the landbank consists of adding all permitted reserves and dividing it by the county's apportionment figure (currently 0.99mtpa). The productive capacity of units is taken into account when assessing the potential to meet the apportionment figure.
Edgcott Parish Council	400055	14ii	1,2,3,4,8,10,13,22	Q. 13a. Selected i) and ii)
Denham Parish Council	400056	5iii	To consider each proposal on its merits.	This will be done
		5iv	To consider each proposal on its merits.	This will be done
		6v	To consider each proposal on its merits.	This will be done
		7iv	Q7 iii) Selected Other appropriate existing waste management sites.	This comment is noted and will be considered in formulating the policies of the Core Strategy
		12iv	By rigorous enforcement of planning conditions and provision of restoration bonds.	The comment is welcomed. The County Council is very active in the enforcement of planning conditions and when it considers it necessary, seeks to obtain bonds
		12v	Liaison meetings.	Noted – there are currently several liaison groups operating within the county.
		12vi	As above.	Noted
		15	Q.13a. Selected i) and ii)	
Robert Brett and Sons Ltd	400057	2bii	M3 - delete this objective as it is not in accordance with current national policy (in MPS1); M2 - replace the word 'enable' with 'ensure'. Bucks CC should identify specific sites and preferred areas where land won mineral extraction could take place, in order to provide greater certainty for future mineral workings.	This objective is in line with Policy M1 (Sustainable Construction) of the South East Plan. The word “enable” gives flexibility whereas “ensure” gives a guarantee which may not be deliverable.
Sworders Agricultural	400058	2avi	The planning objectives should provide the primary framework, with sustainability objectives informing the choice between different spatial strategies which meet the planning objectives.	Agreed
		2bii	M3 - Primary land - non minerals may provide the most sustainable solution in certain circumstances particularly in regard to serving large scale new development, for example by minimising supply from many sources (and therefore locations) which would increase road movements i.e. it should not automatically be assumed that land - non minerals are the most unsustainable option.	This comment is noted and will be taken into consideration in formulating the policies of the Core Strategy.
		3iv	Deliverability - question whether can control planning sufficiently in other districts to ensure Bucks C.C. requirements.	The County Council is the MPA for Buckinghamshire (including the 4 district councils). It cannot control mineral decisions outside its administrative area but can make provision for imports to the county via rail depots.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		5iv	Minerals and waste matters are County matters. This role cannot be delegated to Districts.	<p>The County Council is the Planning Authority for minerals and waste in Buckinghamshire, and therefore determines such planning applications. It does not delegate these to the District Councils.</p> <p>The question really seeks views on what the Council should be seeking in respect of the recycling of C&D waste when determining "County matter" applications.</p>
		10v	Yes - Environmental assessments.	Noted. However the alternative methods of control still seem to be physical separation or continuous monitoring of dusts, noise etc.
		12iv	By using enforcement action to stop further mineral extraction until suitable sufficient restoration is carried out.	Comment welcomed.
		12v	The local community already has sufficient ability to comment at the various stages of the Minerals and Waste DPDs, and at informal consultation stage prior to an application being formally submitted and in response to a formal application. The local community has sufficient influence, if it is required, and the views of any interested parties should be taken into account where possible.	<p>Noted.</p> <p>The comment relating to the informal consultation stage prior to an application being formally submitted is welcomed. The Council wishes to encourage these.</p>
		12vi	Requirements of the landowners and future uses of the land are essential, otherwise the mineral may not get brought forward as a planning application for extraction, unless these issues are resolved.	Comment welcomed.
		14iii	<p>A quantitative approach regarding its ability to meet national and regional targets regarding landbank policies and current supply situations.</p> <p>The number of planning permission conditions that are being contravened and where operators have enforcement actions taken against them.</p>	<p>The Council includes these matters in its AMR as key indicators.</p> <p>CHECK WITH CHRIS C</p>
Quarry Products Association	400059	2bii	M2 - Buckinghamshire CC should identify sites, preferred areas and/or areas of search where extraction could take place, subject to the imposition of appropriate environmental considerations, in order to provide greater certainty of where future sustainable mineral working will take place.	Comment welcomed. This is the approach the County Council has adopted for many years and has proved successful in meeting its aggregate requirement. At present, the County Council intends to continue this policy.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		10v	If buffer zones distances are to be specified, then they should be considered as maximum distances, depending upon results of the Environmental Assessment at application stage and the associated mitigation proposed. Buffer zones are just one type of mitigation that could be suitable.	Disagree. The minimum buffer distance gives assurance (based on technical advice) that proposed development would not be acceptable if located closer than a specified minimum distance. There would be no means of misinterpretation.
		12iv	By using enforcement actions to stop further mineral extraction until suitable sufficient restoration is carried out.	This comment is welcomed and will be taken into consideration when formulating the policies of the Core Strategy.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		15	<p>Buckinghamshire CC should identify sites, preferred areas and/or areas of search where extraction could take place, subject to the imposition of appropriate environmental considerations, in order to provide greater certainty of where future sustainable mineral working will take place.</p> <p>The County Council should make provision to secure the supply of minerals to meet anticipated needs throughout the period 2026. The County Council should identify the areas where mineral extraction and the production of secondary/recycled aggregates are likely to be acceptable and development policies and strategies to cover all aspects of environmental and resource protection including restoration.</p> <p>Areas of the County which are known to overlie deposits of minerals which are, or may become, of economic importance within the foreseeable future, should be designated Mineral Safeguarding Areas.</p> <p>Planning permission should not be granted for any form of development within an MSA unless:</p> <ul style="list-style-type: none"> • the applicant can prove that the mineral concerned is no longer of any value or potential value; • the mineral can be extracted satisfactorily prior to the incompatible development taking place; • the incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; and/or • there is an overriding need for the incompatible development. <p>Overall this Minerals DPD I&O Consultation Report is well written, although there is an obvious lack of policies. This lack of policy will not speed up or improve the production of Minerals DPD.</p>	<p>See 2bii above</p> <p>Government guidance on the future supply of aggregates only extends to 2016 which is reflected in the South East Plan. However, taking into account GOSE advice, the County Council will extend the time period of all DPDs to 2026. Even so, reviews of the DPDs will take into account any subsequent revisions to such targets as apportionments.</p> <p>Agreed. The Core Strategy will identify a MSA.</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Noted</p> <p>Support welcomed. Proposed policies will be included in the Core Strategy Preferred Options Consultation Report.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Little Chalfont Village Society	400060	2av	Should explicitly exclude radioactive or biohazard waste materials in Bucks. Should be a risk assessment provided to residents living within a certain distance of landfill sites.	The Minerals and Waste Core Strategy (MWCS) will not make proposals in respect of these waste streams. The MWCS will contain strategic waste allocations (for example, for Strategic Waste Complexes and associated transfer arrangements). Hazardous wastes will be considered in the Waste DPD. The Council does not believe that this is practicable or necessary. The safeguards necessary will come from the licence requirements set by the Environment Agency being maintained.
		2avi	Should cover naturally radioactive materials - how these will be managed.	Not a matter for a Core Strategy
		2bii	13, 14, 15, 18, are unclear and need rewording to add meaning.	Noted.
		3iv	Risk assessment, cost and visual impact.	
		7iv	Comparison of risk assessments.	
Taplow Parish Council	400061	12iv	Through future permissions.	
		13vi	Permission subject to contribution.	
		15	Minerals and Waste Core Strategy: Development Plan Document Issues and Options Consultation Report (Regulation 25) Q 2a (ii) The South Bucks Vision has been used as being more relevant to this Parish. Of the priorities in the Buckinghamshire Community Plan 2,3 and 4 should be reflected. Relevant parts of Community Strategies should, of course, be used in formulating proposals on minerals and waste. However, these strategies are generally simplistic and anodyne and are prepared under arrangements which depart from the democratic principle of effectively engaging with accountable and elected statutory authorities. In other words they are technically largely irrelevant.	The Community Strategy will be an important underpinning resource in the preparation of the MWCS Preferred Options. Such Strategies have a special place in informing the preparation of the "new" Development Plan Documents as relevant, "high level" and wide-ranging local strategies.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Q 2a (v) & (vi) An important factor in domestic waste is the unnecessary packaging used by manufacturers and super-markets, Though the County Council has no powers over this issue it is hoped that , nevertheless, it lobbies central government on the matter. On minerals a reduction on requirements could be achieved by the use of less traditional forms of construction which could be popularised by central government through the BRS.</p>	<p>Accepted. The Council uses its influence at national and regional level to these ends.</p>
			<p>Q 2b (iii) Vehicular access is all important to the environment and the use of leisure areas. Ideally sites for waste disposal and mineral extraction should be strictly limited to those with direct access to MWs, rail or water.</p>	<p>The Council accepts that traffic and access implications are important, and these will be factors to be tested in the underpinning studies informing the MWCS.</p> <p>However, with regard to the "sustainable modes" of rail and waterway, it remains a fact that there are few such opportunities within Buckinghamshire. The majority of mineral and waste carried is likely to be moved by road. This means that there will need to be greater consideration of proximity (for waste) and routeing.</p>
			<p>Q 3 The demand for building material and areas for waste disposal is a direct reflection of the growth of the south east. The building of offices and houses to accommodate office workers is in most cases totally unnecessary except for the benefit of property developers and speculators. The use of information technology enables a much more equitable spatial distribution of development nation wide. This would make better use of human resources and physical infrastructure at cheaper costs. Council proposes that the County vigorously lobbies central government on this key development issue.</p>	<p>Although the Council supports SMART economic growth and the use of information technology is a major contributor, there will be further growth and development in the County.</p> <p>There will be a need for mineral and management of wastes. The MWCS will contain policies that will reduce growth in the interest of conserving resources.</p>
			<p>Q 5 The SE Region should also be lobbied on the issues raised on Qs 2 and 3.</p>	<p>Noted.</p>
			<p>Q7 Protection of the environment in all its aspects must be of paramount importance.</p>	<p>Agreed. However hazardous wastes must be managed somewhere.</p>
			<p>Q 10 This Council has suggested a greater distance on all buffer zones. However this is a particularly good example where the best answer would be achieved by a meeting with the relevant Parish Council which best knows local conditions and the views of the people.</p>	<p>The Council has provided Supplementary Planning Guidance (SPG) on buffer zones and the separations were considered at the BM&WLP Inquiry.</p> <p>The Council encourages applicants to hold local pre-submission exhibitions/meetings. These could consider buffer zones.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Q 12 (iii) Use of the land is very much dependent upon potential demand. In some cases there may be a need for sports fields, equestrian activities or open-air concerts e.g. As with the response to Q IOa most appropriate answer in each case is by face to-face engagement with the relevant Parish Council. A blanket answer would not be meaningful.</p>	<p>This question relates to whether lower grade agricultural land should necessarily be restored back to agricultural use, and, if so, should the quality be improved.</p> <p>This answer suggests that such sites should not always be restored back to agricultural use. The Council agrees this view.</p> <p>Clearly the matter of a different afteruse ...</p>
			<p>Q 12 (iv) Where gravel companies propose to continue extraction in the County future permissions could, perhaps, be conditional on restoration of unrestored land where the latter was in the ownership of the particular applicant. An alternative strategy would be to levy a restoration charge as a condition on all permissions calculated to meet the costs of restoring all unrestored land.</p>	<p>When sites have not been restored by an applicant then enforcement action would be taken to require restoration in accordance with the approved scheme. If a standard of restoration over and above that approved is required then this could be secured through section 106 agreements.</p>
			<p>Q 12 (v) In all cases a face-to-face engagement should be conducted with the appropriate Parish Council for purposes of exploring solutions which meet local aims and aspirations and are consonant with technical and financial reality. Consensus should be the aim.</p>	<p>This is currently undertaken through site liaison groups such as that involving Taplow Parish Council.</p>
			<p>Q 12 (vi) The need, as in all the above, is for procedures to be laid down for the engagement of Parish Councils in decision making in order to make use of their local knowledge and to recognise that in a democratic society local communities have the right through their elected and statutory authority to discuss their views in dialogue with a superior authority. This is at present honoured in the breach.</p>	<p>SCI</p>
			<p>Q 13 (vi) A charge could be made, commensurate with potential waste generated by the development, to be conditional to planning permission. Similarly public costs as a result of mineral extraction could be calculated and levied as a condition of permission. Such charges could relate to traffic calming measures, physical environmental improvements etc. These matters should be settled in discussion with Parish Councils as the situation occurs.</p>	<p>No</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			Q 14 It is not possible to identify universal indicators. Each case would need to be examined on its merits. However environmental indicators should be applied in all cases. Again, it would be appropriate for indicators to be chosen in association with Parish Councils.	Noted
			<p>Comment.</p> <p>Taplow Parish Council wishes once again to record its concern regarding the current method of consultation with Parish / Town Councils. A tick-box questionnaire may be appropriate for the general public though it is most unlikely to correspond to a meaningful statistically representative sample. However, when applied to a statutory, executive and elected body such as a Parish Council it represents bad governance, lacks democratic principles, fails to exploit a body of knowledge and is contrary to government policy identified in Planning Policy Statement 1. The current situation where a response to a questionnaire by a Parish Council is given the same weight as an individual is blatantly absurd. Contrary to the view expressed by the County Council this disparity is not corrected by the Planning Inspector.</p>	<p>The Council pays keen regard to responses received from Parish Councils for precisely these reasons. It is likely that the independent Inspector who conducts the Examination into the MWCS will similarly do so.</p> <p>The Council therefore does not accept that a Parish Council is disadvantaged by current consultation arrangements.</p> <p>One important feature of the "new" planning system is that respondents are asked to indicate the "soundness", or otherwise, of a Development Plan Document. The emphasis is therefore upon the quality of the arguments made, rather than a simple weighting of the number of objectors. The responses received from Parish Councils are normally of high quality content effectively marshalling local views. For these reasons they will usually be more influential than individual responses.</p>
Berkshire JSPU	400062	3iv	Distance of source & mode of transport. May have to select a mixture of these options for supply of aggregates.	Agreed. Comment welcomed.
		14iv	See Berks Unitary Authorities Joint Minerals & Waste AMR.	Noted
		15	Q4 iv) The County council should not compromise the sustainability objectives. All of the objectives are important. Consideration could, though, combine some of the objectives which may help to simplify and clarify the SA process.	Accepted, in principle. In fact, the Council has been able to to reduce its SA objectives somewhat in number whilst improving the coverage in the way that has been suggested.
			Q11 i) & ii) A mixture of a) and b).	Comment welcomed.
			Q13a. i) & ii) selected.	Comment welcomed.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			Q15 Consider the possibility of producing an SPD for minerals with regard to the land between Maidenhead & Slough in Bucks jointly with the Berks Authorities to enable the most sustainable method of extraction of minerals resources in this area, SEA permitting.	The County Council has held meetings with the Berkshire JSPU regarding this area of the county and the possible extraction of minerals. One operator proposal involves the extraction of aggregate from both Berks and Bucks. Therefore the County Council intends to keep the Berks JSPU fully informed with the possibility of producing an SPD.
Lafarge Aggregates Ltd	400063	15	Question 1 -End-date for the Core Strategy DPD We believe the Core Strategy DPD should cover the period to 2026 in accordance with the Regional Spatial Strategy.	Agreed. The Council has, in fact, revised its MWLDF and the end-date of all DPDs is now 2026.
			Question 3 -Supply of Aggregate for Future Growth In developing a long-term strategy to provide primary or secondary/recycled aggregate for the major growth areas in Buckinghamshire we would look to support option i) and encourage Buckinghamshire to be self-sufficient. However, it is also important to recognise that the supply and demand for minerals is market-led and may result in imports from outside the county. The future supply of minerals within Buckinghamshire should also take into account the need to provide for existing markets and it may be there is a need to increase the level of supply within Buckinghamshire to meet the likely increased demand for the major growth areas of Aylesbury Vale and Milton Keynes.	The cost of aggregate dictates that is uneconomical to transport the material more than about 25 miles. This means that the aggregate from south Buckinghamshire can travel north to around Aylesbury but not further. To alleviate the problem of meeting need for the growth areas, the County Council will attempt to identify rail depots in central and north Bucks as the most sustainable option.
			Question 4 -Safeguarding of Mineral Reserves The County Council in safeguarding mineral deposits should include all mineral deposits within the MSA. Deposits that are not economically viable at the present time may become so during the Plan period and therefore should be afforded protection.	The MWCS will contain proposals for an MSA. This is likely to be drawn to reflect the most viable sand and gravel deposits within the county.
			Question 5 -Alternative Aggregates Production To reduce the apportionment of landwon primary aggregate if C&D recycling targets are met is not appropriate. Secondary and recycled aggregate has a role to play but cannot replace landwon primary aggregate. Option ii) is supported, for the County Council to work with the districts to encourage C&D re-use recycling facilities.	The Council would like to see consideration of this matter by SEERA (or successor body). It believes that such a combined apportionment would encourage new recycled aggregate facilities, and the most appropriate use of primary aggregates. Support welcomed.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Question 6 -Landfill The issues surrounding Question 6 seem to concentrate on restricting wastes going to landfill. As stated in paragraph 8.7, page 30, there will always be some residues from waste recovery processes that will have to be landfilled. The future direction of landfilling by the county council should be fit for purpose, There will clearly be a need for continued disposal of inert wastes within quarry voids to provide for the best restoration opportunities. Spade oak Quarry is currently being restored with the disposal of inert wastes.</p>	<p>It is true that the question is intended to inform the husbanding of voidspace. Increasingly this should be for the residues from waste recovery processes.</p> <p>There will also be a proportion of inert/C&D wastes that are not appropriate for processing into recycled aggregates (for example, soils). These will have a continuing role in the restoration of landfills.</p> <p>The Council has calculated that there is sufficient landfill capacity within the county to met requirements to 2026.</p>
			<p>Question 8 -Protection of Designated Environmental Sites Mineral and waste developments will always look to locate sites in areas that have the least environmental impact. However, minerals can only be worked where they are found and at times this may mean extraction in environmentally sensitive areas. The policy approach to look to protecting locally important environmental areas as a last possible option is not acceptable; this is in effect a stronger policy than that advocated in MPS1 for sites of national importance. Mineral and waste operations will always seek to minimise their environmental impact to acceptable levels and indeed restoration of mineral workings often provides for environmental improvements.</p>	<p>The County Council are aware of the difference in safeguarding international/national and local environmental areas. Indeed, this approach is reflected in Policies 24 and 25 of the adopted Minerals and Waste Local Plan (M&WLP). Although not regarded as of international or national importance, other locally environmentally important sites must also be afforded protection. As constraint free mineral sites are worked and fewer become available, additional pressure will be placed on the more sensitive sites. It is at this time that attempts must be made to minimise the environmental impact of mineral extraction.</p>
			<p>Question 9 -Protection of Amenity In developing a policy on protecting amenity we have the following comments to make: the majority of operations are temporary and the Government provides guidance which sets suitable limits for the criteria that is discussed, e.g. noise, dust. To differentiate between permanent and temporary uses could lead to confusion. All mineral operations are temporary, albeit that some can last for a number of years, it would not be appropriate for these operations to be subject to different standards than permanent operations. However, national guidance does recognise the need for different controls for temporary operations on mineral sites, such as the creation of soil mounds, where higher noise limits are allowed for a period of up to 8 weeks in anyone year. The approach of Buckinghamshire should be in accordance with national planning guidance in allowing for temporary operations.</p>	<p>Agreed</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Question 10 -Buffer Zones We recommend no buffer zones for the simple reason that it is not appropriate to set arbitrary distances to preclude mineral extraction. If mineral extraction can meet the required environmental standards set in guidance then development should be permitted, irrespective of distance. The setting of buffer zones is not necessary where there are appropriate safeguards already in place. Furthermore, buffer zones can result in the unnecessary sterilisation of mineral resources.</p>	<p>The Council does not agree. This matter was considered at the BM&WLP.</p> <p>The Council has prepared Supplementary Planning Guidance (SPG) which allows for some flexibility in separation distances.</p> <p>The Buckinghamshire distances are not "arbitrary" but result from empirical information based on advice from South Bucks District Council Environmental Health Department.</p> <p>Buffer zones are "popular" with Members and the public, and are easily understood.</p>
			<p>Question 12 -Restoration and Aftercare We would support option ii) in that restoration can provide a wide range of landscape and ecological benefits but would also add the following considerations. National Planning Guidance that is set out in PPS7 recognises that the emphasis on returning land to agricultural use is no longer as strong. However, there is a necessity to ensure soils are replaced to a standard that could be used for agriculture, should the desire! need arise in the future.</p>	<p>Comment welcomed.</p>
			<p>Question 11 -Sustainable Transport It is sensible for mineral and waste facilities to be located in the general proximity of where demand arises, with easy access to the strategic highway network. We would support policies that encourage the use of alternative sustainable methods of transport through the encouragement of wharves and rail depots.</p>	<p>Agreed.</p>
			<p>Question 13a -Financial Guarantees We object to the development of a policy which provides a financial guarantee for restoration and aftercare schemes. We believe that such a policy is unnecessary due to the fact that Lafarge are members of the QPA and have an excellent track record of restoration schemes.</p>	<p>The Council understands this concern. Nevertheless this has been an effective policy in the small number of instances where there has been doubt about restoration and aftercare schemes.</p> <p>Evidence was presented to the BM&WLP LPI ...</p>
CABE	400064	15	<p>1 Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time.</p> <p>2 Robust design policies should be included within all LDF</p>	<p>Accepted.</p> <p>Accepted. This consideration will be particularly relevant</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales.</p> <p>3 To take aspiration to implementation, local planning authorities' officers and members should champion good design.</p> <p>4 Treat design as a cross-cutting issue -consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm.</p> <p>5 Design should reflect understanding of local context, character and aspirations.</p> <p>6 You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes.</p> <p>You might also find the following CABE Guidance helpful.</p> <ul style="list-style-type: none"> • "Making design policy work: How to deliver good design through your local development framework" • "Protecting Design Quality in Planning" <p>- "Design at a glance: A quick reference wall chart guide to national design policy".</p>	<p>to large waste plant (for example, an Energy from Waste plant).</p> <p>Accepted.</p> <p>Accepted.</p> <p>Accepted.</p> <p>Accepted, in principle. However the Council considers that there will be limited scope within a Minerals and Waste Core Strategy.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
Defence Estates South	400065	15	The MOD operates an airfield at RAF Halton. This must be protected from any inappropriate development. Inappropriate development would include incinerator towers affecting flight paths or development that raises the potential for bird strike close to the airfield.	Accepted. The Council will therefore not maintain its proposal for and Energy from Waste plant at College Road North, Aston Clinton. This proposal will not feature in the MWCS.
Dorney Parish Council	400066	15	Dorney have 'no comments'.	Noted.
Iver Parish Council	400067	3iv	Reasonable accessibility to reduce use of road network.	Accepted.
		12iv	By appropriate disincentivisation including financial penalties and being viewed disfavoured in the future.	Noted.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		12v	As high as reasonably possible through District/Parish and community groups.	The Council encourages applicants to involve the community directly through exhibitions and presentations for major proposals (see adopted Statement of Community Involvement, paragraph 4.15). These matters could include restoration and aftercare schemes.
		12vi	Early and sustained consultation with local community.	See above.
		14ii	SA3, SA16 and SA13 - Targets set at local community forum open to all residents.	These are Sustainable Objectives and not targets. Where targets are appropriate they should be devised by the Council and applied equally to each of the sites/allocations. Communities can have an effective influence through Site Liaison Committee.
		14iv	Air quality checks, noise assessment.	Comment welcomed.
		15	Any proposal needs to have effective local consultation which actually responds to local concerns and not just pay lip service to the concept of consultation. It needs to be clear, concise and informative and not full of industry jargon, to enable accessibility to the whole community.	Noted.
		Chiltern District Council	400068	3iv
7iv	Location of proposed facility in relation to existing population.			Accepted.
15	Q2a iv) and Q4 iv) - we do not feel that it is appropriate for us to identify specific objectives or to choose the most or least important. It is considered that it is the role of the sustainability appraisal to assess such impacts and to come up with relevant sustainable objectives. In our view they are all important and will vary in the level of importance depending on the site location and type of proposed use.			Accepted. The MWCS Preferred Options will be underpinned by a full SA/SEA. This will be informed by a somewhat reduced number of SA objectives which nevertheless improve their coverage.
	Q7. ii) Selected cells located at suitable landfill sites and other treatment/processing facilities. iii) Selected landfill sites and other appropriate existing waste management sites.			Comment welcomed. Comment welcomed
	Q13a. iv) Selected - Joining an industry restoration scheme and a bond.			The Council sees these as an either/or, depending upon circumstances.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Natural Environment and Green Infrastructure Team	400069	15	<p>Summary</p> <p>Existing references to nature conservation and geological conservation are welcomed and encouraged. Commitment to such objectives in, for example, the Sustainability Objectives and the Spatial Objectives, are reassuring.</p> <p>However, reference to Planning Policy Statement 9: Biodiversity and Geological Conservation is currently limited in scope and the duty upon planning authorities to conserve biodiversity under the Natural Environment and Rural Communities Act 2006 is not addressed.</p> <p>Useful reference could also be made to good practice guidance relating to biodiversity and geodiversity, such as guidance from the Minerals and Nature Conservation Forum 'Biodiversity and Minerals' (1999) and 'Geodiversity and the Minerals Industry' (2003), and also 'Nature After Minerals' (RSPB, 2006) (see references list on last page for more details). There are also new tools, information resources and advisory services available to inform the development and implementation of such a planning document that are not mentioned in the consultation document. In particular, spatial information and other information tailored to meet the needs of minerals planning can be found at http://www.bgs.ac.uk/mineralsuk/home.html and http://www.afterminerals.com. Without appropriate reference to the above, the document will fail to deliver biodiversity and geodiversity objectives and to make the most of opportunities.</p> <p>There is no reference of green infrastructure in the Minerals and Waste Core Strategy DPD.</p> <p>In the preface it is recognised significant growth will occur in Buckinghamshire, which will require adequate investment in infrastructure, while protecting and enhancing local environments. In ensuring sustainable waste management solutions and meeting the demands of growth, it would be appropriate to recognise green infrastructure in the plan. More specific comments are made below.</p>	<p>Comment welcomed.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>ISSUE 8 Question 8: It is important to note that the consultation document does not recognise the complete list of ecological and geological interests as recognised in PPS 9 (page 6) that could be affected by waste and minerals development. The missing interests that need to be added are:</p> <p>1 Local Sites (a non-statutory ecological and geological designation which includes Local Wildlife Sites and Regionally Important Geological and Geomorphological Sites).</p> <p>2 Biological Notification Sites (non-statutory nature conservation sites which are recognised in Local Plans and need to be recognised in DPDs).</p> <p>3 Habitats and Species of Principal Importance (as listed in the Countryside and Rights of Way Act 2000 and now in Section 41 of the NERC Act 2006).</p> <p>4 Aged or 'veteran' trees found outside woodland.</p> <p>5 The county's network of natural habitats (for example hedgerows, watercourses, green lanes).</p>	<p>Comment welcomed. The Council acknowledges the importance of these ecological and geological interests.</p> <p>The Area Statements which will form part of the MWCS Preferred Options will be updated to include these designations, as advised.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Question 8i.</p> <p>In accordance with PPS 9 and in compliance of the planning authority's duty to conserve biodiversity under the NERC Act 2006 (which involves enhancement and restoration), development affecting biodiversity and geology interests should be avoided whenever possible. Where an interest is seen as a 'last possible option', the proposal should in the early stages be subject to an appropriate assessment to ascertain the potential damage/loss as per relevant policy and legislation.</p> <p>Where development affecting these interests is being considered, attention should be drawn to page 2 of PPS 9 which states that 'local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm' and if 'significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused'.</p>	<p>Accepted. However it will be a requirement that the MWCS Preferred Options should propose strategic allocations for future waste management facilities. It is likely that biodiversity and geology interests will be present adjacent to, or actually on, some of these sites. If so, the applicants will need to avoid relevant parts of the site (where this is possible) or to propose "adequate mitigation" (where not possible).</p> <p>The Council will wish to see a positive approach to enhancing biodiversity (perhaps by linking up or extending existing designations).</p>
			<p>Question 8ii.</p> <p>Differential weighting of interests is not an approach recommended or stated as necessary in PPS9. It is advised that relative significance should be determined by an appropriate assessment carried out on a site-by-site basis in accordance with policy and legislation.</p> <p>Whatever approach is taken, an arbitrary ranking of interests should be avoided to ensure that interests are not mis-represented and that the methodology stands up to scrutiny.</p> <p>Page 35 Typing error -refers to Table 3 in text but labels table as Table 4.</p>	<p>Accepted. The SA/SEA underpinning the MWCS Preferred Options will not seek to weight interests.</p> <p>See above.</p> <p>Noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Section 9.2 PPS10 locational criteria (pages 23-24) refer to visual intrusion; nature conservation; and historic environment and built heritage. These factors relate to specific and separate site designations. The current text and table does not make this clear and can be rather confusing. For example, the text can be read to suggest that nature conservation and historic environment and built heritage factors need to be considered in relation to Areas of Outstanding Natural Beauty. This is contrary to PPS10 guidelines that refer to visual intrusion only in relation to AONBs. Clarification is needed here.</p>	<p>Not understood. "Confusion" not stated by any other Consultee.</p>
			<p>Section 9.7 Please amend 'Colne Valley Park' to 'Colne Valley Regional Park' in the table.</p> <p>'Locally-important' is not an appropriate term for all the interests listed in the table. For example, ancient semi-natural woodland has significance on a national scale as well as local scale. A better description might be 'Other sites of Biodiversity and Geological Conservation Value', which is similar to PPS9 description. Or it is suggested that this table and the table 'under section 9.2 are brought together under the heading 'Sites of Biodiversity and Geological Conservation Value' to align with PPS9.</p> <p>Further comments with reference to PPS 9 and guidance from the Minerals and Nature Conservation Forum 'Biodiversity and Minerals' and 'Geodiversitv and the Minerals Industry'</p>	<p>Agreed.</p> <p>Accepted. However these <u>are</u> local designations.</p> <p>Noted.</p>
			<p>ISSUE 9 Para 9.9/9.10 -As mineral extraction and waste management facilities are forms of development, the strategy should recognise publicly accessible greenspace and their links (e.g. rights of way) as an element of green infrastructure provision in Buckinghamshire. There will potentially be a requirement to protect publicly accessible greenspace and links, provide suitable mitigation and explore opportunities for the creation of new green infrastructure as part of restoration/mitigation proposals.</p>	<p>The SA that underpins the MWCS will consider these matters and identify forms of mitigation. These will be built in to the Area Statements that will form part of the plan.</p> <p>As a general principle, the Council will want to see a positive and proactive approach to these matters in subsequent planning applications.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>ISSUE 10 Question 10 Biodiversity and geology are 'sensitive land uses' but are not currently mentioned. In accordance with the principles of PPS9, the provision of buffer zones and determination of buffer distances should take into account the conservation, enhancement and restoration of biodiversity and geology interests. Considering biodiversity and geology interests vary from site to site, buffer distances can only be indicative until proper assessment, such as an EIA, is carried out on a site-by-site basis. This limitation of defining indicative buffer distances needs to be emphasised. However, we would suggest that such a limitation should be reason to discard them entirely in preference for a commitment to location-and time-specific EIA.</p> <p>Further comments with reference to PPS 9</p> <p>It needs to be communicated that biodiversity and geological considerations detailed in PPS9 relate to the development as a whole, including the landscaping and management of the extraction workings and the surrounding area. Specific habitats that benefit specialist species can be created in an active quarry and restoration requirements can be linked to the creation of priority habitat to meet UK BAP targets. After management options must be appropriate to the site and not detrimental to the ecological/geological interest present, for example tree planting would be inappropriate where there is calcareous grassland.</p>	<p>Again, the SA will consider these matters.</p> <p>Clearly these are detailed considerations and ultimately fall to be determined in planning applications, not least because technology, scale and configuration of proposals will be relevant. EIA relates to this stage.</p> <p>Accepted.</p> <p>Accepted. The Council will want to see a positive and proactive approach to these matters in subsequent planning applications.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>ISSUE 12 Question 12 Question 12 ii. With reference to PPS 9 (page 4 and 7) and Minerals and Nature Conservation Forum guidance, commitment to maximise opportunities to create or restore natural and/or geological interest should be made here. This does not imply any conflict with other options for restoration - biodiversity and geology can be integrated with other outcomes such as public access and education or water management benefits. Where a sustainable approach is adopted, there will be no need to choose between economic, environmental and social gains -all objectives should be met by a restoration scheme. Successful schemes are illustrated in Minerals and Nature Conservation guidance. The Green Infrastructure Strategy, the Biodiversity Opportunity Mapping Project and the Buckinghamshire Environmental Character System can all assist in developing restoration schemes.</p>	<p>Accepted. The SA underpinning the MWCS Preferred Options will address these matters at the appropriate level.</p> <p>However, it is likely that they benefit from consultation responses (and other work prior to submission of the MWCS to Government) to identify detailed outcomes and environmental opportunities.</p>
			<p>Question 12 iii. Land should not necessarily be restored to high-grade agricultural land where other opportunities may achieve greater benefit for biodiversity/geology/local community and where a sustainability assessment of options suggests restoration to high-grade/intensive agriculture is not the most sustainable option. A site-by-site assessment should be carried out to consider all possible options and in accordance with policy and legislation relating to sustainable development. As part of sustainable development, PPS 9 requires biodiversity and geology gains to be sought where possible.</p>	<p>Comment welcomed.</p>
			<p>Question 12 v. The council could encourage restoration of unrestored land to meet biodiversity and geology objectives through the Buckinghamshire & Milton Keynes Biodiversity Partnership. Such a partnership is promoted in Minerals and Nature Conservation Forum guidance.</p> <p>Other green infrastructure needs could be met through restoration schemes, with reference to the Green Infrastructure Strategy.</p>	<p>Comment welcomed.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Question 12 vi.</p> <p>With reference to para 10.9, the damage and disruption to the biodiversity and geological interest also needs to be mentioned. (For more information about the negative impacts of waste, minerals and aggregate development, see http://www.english-nature.gov.uk/news/statement.asp?ID=32</p> <p>http://www.english-nature.gov.uk/news/statement.asp?ID=23</p> <p>http://www.english-nature.gov.uk/news/statement.asp?ID=2)</p>	<p>Noted. However, the sites likely to be allocated for, say, Strategic Waste Complexes are/contain existing or former landfills. The context is one of "disruption" - this is why the Council sees the potential for positive gains (and not just "mitigation").</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Question 12 iv. Restoration should follow best practice guidelines, including the Minerals and Nature Conservation Forum guidelines. For example, 'Biodiversity and Minerals' states that 'once sites have been allocated for development, more detailed restoration planning is needed. This should address the measures required to achieve BAP targets and other opportunities for enhancement, and should be integrated with the environmental assessment process. There are also opportunities to meet BAP targets through revisions to restoration plans' (page 4).</p> <p>Restoration objectives should take into consideration management and aftercare to ensure they are achievable.</p> <p>As per guidance from the Minerals and Nature Conservation Forum, restoration plans affecting biodiversity and geology should be adjusted to reflect monitoring programme findings ('Biodiversity and Minerals', page 5).</p> <p>As per guidance from the Minerals and Nature Conservation Forum, 'conditions may cover a period of after-care of up to five years. But to achieve biodiversity benefits, it is usually essential to ensure that the management beyond this period is carefully planned. This can be achieved through various forms of planning agreements' ('Biodiversity and Minerals, page 12).</p> <p>Furthermore, restoration proposals could also seek to provide opportunities for green infrastructure provision in the county, particularly given the increased pressure for the creation of waste sites as a direct result of growth.</p>	<p>Accepted (see above).</p> <p>Agreed.</p> <p>Accepted. Again, this would need to be a consideration at planning application stage.</p> <p>Noted.</p> <p>Noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>ISSUE 13 Question 13a PPS 9 requires planning authorities to seek biodiversity and geology gains where possible and the Natural Environment and Rural Communities Act 2006 imposes a duty on the planning authority to conserve biodiversity. Securing a guarantee of restoration where it relates to biodiversity and geology will manage the authority's risk of failing to meet the requirements of policy and legislation. We urge the most secure guarantee to be found but cannot advise upon the best mechanism. However, we can suggest:</p> <p>Promoting the Environmental Management System approach would assist in managing any risks of failing to restore/operate to the agreed standard (see Minerals and Nature Conservation Forum publications for more information). Other accreditation schemes would also be applicable.</p> <p>Creating supportive and binding partnership agreements or projects between the council, developer/applicant/operator and other organisations such as Natural England, local Wildlife Trust, RSPB, funding bodies.</p>	<p>Accepted. Again, this would need to be a consideration at planning application stage.</p> <p>Noted.</p> <p>Noted.</p>
			<p>Question 13b In accordance with PPS 9 guidance that development should seek conservation and enhancement of biodiversity and geology, the authority could seek developer contributions to help deliver these outcomes in relation to waste and minerals sites especially where contributions could strengthen/enhance any mitigation/compensatory measures relating to biodiversity/geology/green infrastructure generally. There is real opportunity that some of the schemes illustrating good practice in Minerals and Nature Conservation Forum guidance could be made more achievable in this county with external funding from non-waste/minerals related developer contributions (see publications for examples).</p>	<p>Noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>ISSUE 14 Question 14 ii. Reference to SA5: Proportion of successful development applications securing a commitment to delivery of at least one BAP target.</p>	<p>Noted. The Council regularly reviews indicators used in its AMR (Annual Monitoring Report). Each of the following will be considered for inclusion. It should be noted that the MWCS will contain relatively few allocations, and so it may be that regular annual reporting on these indicators would not be useful in indicating trends. Nevertheless they could be addresses as appropriate.</p>
			<p>Proportion of successful development applications securing a commitment to delivery of at least one BAP target through operation management plan (Target: 100%)</p>	<p>Noted.</p>
			<p>Proportion of successful development applications securing a commitment to delivery of at least one BAP target through restoration plan (Target: 100%)</p>	<p>Noted.</p>
			<p>Proportion of operating sites that are managed according to Environmental Management System ISO 14001 approach. (Target: 100%)</p>	<p>Noted.</p>
			<p>Proportion of active waste/minerals sites failing to meet biodiversity/geology objectives agreed with the authority. (Target 0%) (This would be an enforcement indicator relating to objectives such as destruction of a bat roost; failure to install bird boxes; failure to maintain a hedgerow; failure to avoid working within veteran tree root protection zone etc)</p>	<p>Noted.</p>
			<p>Proportion of restorations completed within the reporting period that fully meet the restoration objectives relating to biodiversity and geology. (Target: 100%) (This would be an enforcement indicator)</p>	<p>Noted.</p>
			<p>Proportion of successful planning applications that apply to an area that is fully or partly recognised as a site of biodiversity or geology interest as defined in PPS 9. (Includes ancient semi-natural woodland; BAP priority habitats; SSSIs; SACs; SPAs; RIGS; LWSs; BNSs; LNRs). (Target: 0%)</p>	<p>Noted.</p>
			<p>Proportion of successful planning applications that affect a</p>	<p>Noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			iv Ensuring there is planning authority representation at the Buckinghamshire & Milton Keynes Biodiversity Partnership and aligning planning indicators with the Local Biodiversity Action Plan indicators will produce mutual benefit with regards to integrating monitoring and reporting of biodiversity and geology indicators. Additionally, feeding biodiversity and geology information to the Bucks and Milton Keynes Environmental Record Centre (BMERC) will also be useful to both parties since the centre can provide a data management and reporting service.	Noted.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>ISSUE 15</p> <p>Standard working practices such as the Environmental Management System approach certified to ISO 14001 or EMAS standard should be promoted to ensure biodiversity and geology are integral to the auditing and management processes relating to a development. (See page 9 of 'Biodiversity and Minerals' for more information).</p> <p>Planning and assessments should make use of the latest environmental information. For example: Detailed spatial and non-spatial information relating to the county's habitats and other green infrastructure can be made available by the Buckinghamshire and Milton Keynes Biodiversity Partnership and also by the Natural Environment and Green Infrastructure Team at the county council. In particular, the Buckinghamshire Environmental Character System offers detailed spatial environmental information for the county that could be tailored to development needs. The Green Infrastructure Strategy would also inform any development and restoration plans.</p> <p>Environmental sensitivity mapping information provided by the British Geological Society in partnership with the Mineral Industry Research Organisation should be used to inform any environmental assessments of sites. (See http://www.bgs.ac.uk/mineralsuk/home.html for more information).</p> <p>The information and mapping system available on the interactive website www.afterminerals.com should also be used to inform assessments and proposals for restoration schemes.</p> <p>For background information about the specific relevance of waste and minerals planning to biodiversity and geology, go to: http://www.english-nature.gov.uk/news/statement.asp?ID=32 http://www.english-nature.gov.uk/news/statement.asp?ID=23 http://www.english-nature.gov.uk/news/statement.asp?ID=2</p> <p>English Nature, Quarry Products Association and Silica & Moulding Sands Association (1999), Biodiversity and Minerals -Extracting the benefits for wildlife', Entec UK Ltd.</p>	<p>Accepted.</p> <p>Comment welcomed.</p> <p>Noted.</p> <p>Noted.</p> <p>Comment welcomed.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Wycombe District Council	400070	3i	<p>Q3: Supply of Aggregate for Future Growth. This issue relates to whether we should continue to allow for growth in the north of the county to be provided via minerals extractions in the south -i.e. transporting minerals up through the county.</p> <p>3.i) No.</p>	<p>The cost of aggregate dictates that is uneconomical to transport the material more than about 25 miles. This means that the aggregate from south Buckinghamshire can travel north to around Aylesbury but not further. To alleviate the problem of meeting need for the growth areas, the County Council will attempt to identify rail depots in central and north Bucks as the most sustainable option.</p>
		3ii	<p>The paper suggests that continued transportation of construction materials from the south to the north of the county would be unsustainable. The north of the county has no materials supplies and increased use of secondary/recycled aggregate would be insufficient to cater for demand, so the corollary is that more will be needed from outside the county.</p> <p>(ii) No -from the information provided this may well not be possible. It is important also to realise that the growth areas in the north of the county are part of a national and regional growth area so it is more than a Bucks issue to try to provide for the necessary aggregates from the south of the county.</p>	<p>See above – This is an important point and will be promoted by the County Council.</p>
		3iii	(iii) Yes -see comments above re the national V regional nature of the growth proposals.	<p>This point is noted and will be promoted by the County Council.</p>
		3iv	(iv) One factor should be that subject to environmental and infrastructure considerations, imported aggregates should be from locations as close as possible to where it is required.	<p>It should be acknowledged that at some stage of delivery, road transport will be involved. This is the least sustainable means of transport when compared with rail and water. The County Council will therefore attempt to identify rail depots and wharves where this is feasible.</p>
		8i & ii	8 (i & ii): The local designations should all be given the same level of protection, although some of those listed (e.g. common land and village greens) may have additional protection through other non-planning legislation. Airfields are not an environmental constraint/local designation unlike to the others listed in para 9.7.	<p>Other consultation exercises undertaken by the County Council have revealed that some respondents have concerns regarding different weighting applied to various environmental designations. It would appear therefore that the District Council suggestion may be the most appropriate way to evaluate such designations.</p>
		13b	13b: Policies should be included in relevant District Local Development Documents to secure this and facilitate negotiations on planning applications. There could be scope for taking financial contributions in the future for waste and recycling facilities, but the necessary policy framework would be required in a District Local Development Document.	<p>Comment welcomed.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
Government Office for the South East	400071	15	For audit trail purposes you should ensure that the document title appears in a header/footer on all pages of all DPDs/ evidence base papers etc.	This is noted and will be introduced in future documents.
			Maps/ Diagrams: It would be helpful if you could make much greater use of maps and diagrams to illustrate either issues (e.g. likes of the waste hierarchy) or maps (e.g. current spatial distribution of waste sites/mineral deposits or future areas of growth i.e. where new waste facilities may be required etc).	This suggestion is noted. The Core Strategy Preferred Options Consultation Report will contain appropriate maps and diagrams.
			Cross Border Issues/ Options and Relationships: Given the nature of minerals and waste per se and the nature of the relationships between Bucks County/ Milton Keynes/ London and the other county's, more should be said on the issue off potential for cross border thinking/ working/ action. For example with regards to serving growth points/ areas, or providing sub-regional specialised waste facilities, or ensuring that while net self sufficiency is broadly maintained overall opportunities for "waste miles" reduction are not missed. The current document tends to read as if Buckinghamshire were an island, rather than part of a network of communities and M&W stakeholders that uniquely interact to affect the future of M&W in and around the county, and hence require a bespoke LDF.	The County Council meets adjoining authorities such as Northamptonshire, Bedfordshire and Milton Keynes in the north and the Berkshire Joint Strategic Planning Unit in the south of the county. In addition, the County Council liases with other MPAs and WPAs in the south east through groups such as SEERAWP and SERTAB. We shall hold workshop sessions to which adjacent authorities, and others, will be invited to discuss the draft MWCS Preferred Options and the underpinning SA.
			Pen Picture: It is a basic requirement of the new system to provide in all DPDs a clear analysis of the past/present/ future of the areas/ issues, in order to provide the necessary context and feel for what an area has been like and will be like at the end of the plan period as a result of the implementation of the DPD. While your document goes some way to meeting this requirement (e.g. paras 2.4-2.15), it feels rather superficial. Therefore at Reg26 and Reg28 it needs to QO much further.	The suggestion is noted and will be applied when the Core Strategy Preferred Options Consultation Report is produced.
			Proactive, positive planning: At present the document feels a little passive. At Reg26 and Reg28 it should be confident, positive and proactive, by clearly stating what will happen where, why it should happen, who will make it happen, and what will be done if things don't go according to plan.	These suggestions will be introduced in the Core Strategy Preferred Options Consultation Report.

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Para 2.2 You need to clarify the relationship between "Buckinghamshire" and Milton Keynes. The average person will be aware that MK is within the county of Buckinghamshire, so will be confused why it's not mentioned. Perhaps a map showing those parts of Bucks covered by the DPD/ and the geography of plans around it, plus explanatory text, would assist and provide a context for the background section.</p>	<p>Although historically Milton Keynes has been part of Buckinghamshire, it is a unitary authority and as such is a separate MPA and WPA much like any other adjoining MPA or WPA. The majority of people now associate Milton Keynes in isolation rather than being part of Buckinghamshire. However, text will be included in the Core Strategy Preferred Options Consultation Report to make clear the relationship between Milton Keynes and Buckinghamshire.</p>
			<p>Para 2.11 Core Strategies can identify specific sites as necessary. Even if there is no need to identify specific sites, all DPDs should be as locationally distinctive and specific as possible.</p>	<p>This advice is accepted and will be applied to the Core Strategy Preferred Options Consultation Report in the form of the identification of strategic waste sites and a Minerals Safeguarding Area (MSA).</p>
			<p>Para 2.16 You should also include sufficient text with regards to the requirement for, and results of, any Appropriate Assessments. Even if Natural England advise none are needed, you should include reference to their views so that all stakeholders are clear on the matter.</p>	<p>This will be produced in the Core Strategy Preferred Options Consultation Report.</p>
			<p>Paras 2.18-2.20 Key influences are far wider than the plans/ programmes/ strategies of the Council. You should be assessing the impacts of anything produced/ planned by any organisation (public/ private/ voluntary sector) that is likely to have a material impact (direct or indirect) on the M&WLDF. The organisation/impact do not necessarily have to be located within Bucks to be material. You also need to mention key parallel processes such as Procurement.</p>	<p>Organisations such as the Waste Partnership for Buckinghamshire (comprising the five councils within the administrative county) have produced a municipal waste strategy. In addition, Buckinghamshire's Waste Procurement Project is now in progress. Such documents and organisations will be referred to in the Core Strategy Preferred Options Consultation Report.</p>
			<p>Table 2 The SA Objectives are not locally or spatially distinctive. You can add text to explain where/ why/ how the objectives are of relevance to different parts of the county and how they have taken into account cross boundary issues and responsibilities.</p>	<p>The Council will be working with its Consultant to improve its SA Objectives. Part of this process will be to make them more locally and spatially distinctive. This will be reflected in the MWCS Preferred Options.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Para 4.14 You need to explain in greater detail why the step change is needed, what the step change means to different stakeholders, and how people will need to do things differently in future. You also need to explain what the different technologies are and what impacts they do not have in order that people may make better informed judgement comment on your DPDs. The perceptions of many regarding the waste industry are very fixed, yet the future location, operation and practices will be very different.</p>	<p>Accepted. The MWCS Preferred Options will expand on these matters.</p> <p>The Council has had a series of meetings with the waste industry, in particular as informing our <i>Soft Market Testing of Contractors for the Management and Apportionment of Commercial and Industrial Waste Arisings within Buckinghamshire</i>. This has been published by the Council and is intended, in part, to address perceptions of the industry.</p>
			<p>Para 4.21 You will need to be as spatially specific as possible regarding the geography of each type of waste and mineral production/ processing/ disposal. The geography's may overlap or not. The geography's may be similar to those already existing or not. The DPD needs to be clear on all these aspects, such that the various hierarchies/ geographies "add up" and align rather than appear to be disparate and unplanned. The various distributions must also clearly support and help to implement the vision/strategy.</p>	<p>The MWCS will be spatially specific and "add up" the geographic relationships. For example, strategic allocations will be made for Strategic Waste Complexes <u>and</u> the supporting waste infrastructure (eg Waste Transfer Stations), where necessary. These will be considered, and appraised, as "spatial systems", where appropriate.</p>
			<p>Para 4.23 As worded it is uncertain whether the County is accepting its responsibilities with regards to its London Apportionment. All future stages of the DPD must be clear on this point.</p>	<p>The County Council does not have a minerals apportionment for London. The relevant paragraph refers to the allocation of preferred areas for mineral working to meet Buckinghamshire's annual apportionment throughout the plan period.</p> <p>If the comment is intended to apply to <u>waste</u>, then the answer is that the MWCS Preferred Options will make this clear (as did the earlier Waste DPD Preferred Options).</p>
		1	<p>Question 1 GOSE would suggest that in order to best align with the South East Plan and the emerging district LDFs, the Core Strategy should cover the period 2006-2026. GOSE would suggest that all the M&W DPDs should look to cover the same period for the sake of consistency and clarity.</p>	<p>Accepted. This will be the case for all the M&W DPDs (even though minerals advice in the South East Plan regarding aggregate supply only covers the period until 2016).</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		2a&b	<p>Question 2a (i) Soundness Test v requires all DPDs to have had regard to the authority's community plan. Equally it is incumbent upon the M&W LDF to also influence the emerging Sustainable Community Strategy for Buckinghamshire.</p> <p>M&W Spatial Vision The vision must be locally distinctive, as SMART as possible, and openly acknowledge the county's wider responsibilities.</p> <p>W&M Planning Objectives The Planning Objectives are not locally or spatially distinctive. You can add text to explain where/why/ how the objectives are of relevance to different parts of the county and how they have taken into account cross boundary issues and responsibilities.</p>	<p>Agreed. The MWCS Preferred Options will be fully informed by the Community Strategy (the "community plan"). The need for a close relationship is accepted.</p> <p>Agreed. The MWCS Preferred Options will contain such a Vision.</p> <p>Accepted. The MWCS Preferred Options will contain such planning objectives. These relationships will be explicit.</p>
			<p>Para 7.11 Given the changing need for, and means of, development that need to be catered for by the M&WLDF, you need to analyse likely trends into the future as well as looking at the past.</p> <p>Safeguarding Mineral Reserves It is not sufficient for district's to consider the M&WLDF at the application stage alone. District LDFs and the County M&WLDF must pay due regard to each other at all stages of production; for example in order to ensure land allocations in District DPDs do not sterilise minerals. This should be made plain in all DPDs. The District Proposals Maps will also need to reflect the policies/ proposals/allocations in the County M&WLDF.</p> <p>At the Preferred Options stage, the County will need to have analysed all reasonable options in appropriate detail. It will then have to state which options are preferred and why, and which options have been rejected and why. Failure to meet the regulations at Preferred Options may jeopardize the ability of the DPD to move forward to submission and Examination.</p>	<p>Accepted.</p> <p>The Core Strategy Preferred Options consultation report will identify a Minerals Safeguarding Area (MSA). In accordance with paragraph 13 of MPS1, the MSA will be identified in the Core Strategy Preferred Options Consultation Report by way of a proposals map and relevant policies. In addition, the MSA will need to be shown in all district DPDs that it covers.</p> <p>Accepted. The Core Strategy Preferred Options consultation report (and the underpinning SA) will set out a range of options for waste and minerals. The reasons for preference or rejection will be explicit.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Table 3 A map of the distribution of the sites would assist. While it is likely that the CS will be reviewed before 2026, given the nature of the M&W industries and sites, it should at this stage look beyond its plan period to provide the degree of clarity, certainty and front-loading necessary and appropriate. For example, Table 3 would appear to indicate that at 2026 less than 1 years capacity will exist, therefore what does the County intend to do to address the issue?</p>	<p>The MWCS Preferred Options consultation report will be fully illustrated with relevant maps/figures/diagrams.</p> <p>The proposals will not be simply "cut off" at 2026, there will be commentary on the post-2026 situation.</p>
			<p>Hazardous Waste Given the often misinformed and fixed perceptions about this type of waste, the DPD should explain in greater detail what constitutes hazardous waste, and what the changes in the industry/ technology will mean for the future in terms of the spatial options available regarding the creation/ processing/disposal of it.</p>	<p>The MWCS Preferred Options consultation report will contain proposals in respect of strategic allocations for major waste developments.</p> <p>Hazardous wastes will be dealt with in the Waste DPD submission draft. The Council considers that this matter will need to be informed by work being undertaken at the regional level. Ultimately, there will need to be provision at regional or sub-regional levels for "higher level" hazardous wastes.</p>
			<p>Environmental Protection Should the Table 4 list include RIGs?</p> <p>The DPD should also take account of RPG9 (June 2006) with regard to whether M&W facilities can be located in areas subject to environmental designations.</p>	<p>Noted.</p> <p>Accepted.</p>
		Q8(ii)	<p>Question 8 (ii) PPS9 sets out a hierarchy of protection that should be adhered too, unless local circumstances indicate otherwise.</p>	<p>The County Council applies the guidance of PPS9 in the formulation of the policies in all its DPPs.</p>
			<p>Table 5 PPS10 Annex E provides a helpful list of locational criteria.</p>	<p>Noted</p>
		9	<p>Given the longevity of some "temporary" uses/ permissions, the County may wish to base its criteria/assessment on the likely length of the use rather whether it is technically "temporary" or "permanent".</p>	<p>Noted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
		10	<p>Buffer Zones</p> <p>On the basis that it must be assumed that any facilities will comply in full with all applicable regulatory regimes (some of which include protection/ notification zones of one type or another), additional planning based buffer zone policies should be used sparingly, if at all. If used, account should also be taken, inter-akia, of the topography of the locality/ technology to be used/ the neighbouring land uses and developments.</p>	<p>In regard to issues such as topography, it cannot be assumed that regulatory regimes will satisfy buffer requirements. In the case of minerals and waste development, the County Council considers that it should have policies in place in the DPDs which can be applied if necessary to instances where the proposed development may affect sensitive development such as housing, schools and hospitals.</p>
		11	<p>Sustainable Transport</p> <p>It is assumed that you are fully engaging with the likes of the Highways Agency, Rail operators/regulators and road hauliers, to ensure that the strategy you bring forward is agreeable and deliverable in transport terms.</p>	<p>The County Council is fully engaged with the appropriate organisations.</p> <p>The Highways Agency will be a partner body in defining the purpose/methodology of the underpinning Traffic Assessment for the MWCS pr5oposals.</p>
		14	<p>Monitoring</p> <p>The Plan, Implement, Monitor, Manage (PIMMs) regime should be an integrated whole. Thus the Vision/ Strategy/ Policies and Proposals must all be expressed in ways that allow for SMART implementation, monitoring and management. The monitoring aspect should contain indicators that are simple to use and understand and provide maximum appropriate feedback. The management aspect should contain any necessary early warnings, thresholds or triggers for action such that matters are dealt with as soon as possible rather than when they become a crisis.</p> <p>The plan should also indicate the types of action that will be taken (the Plan B) in the event that the intended strategy/policies/ proposals either do not get implemented as planned or circumstances change such that a review is necessary. PIMMs is challenging but is made simpler and easier when the vision and strategy are clear from the start, are underpinned by a robust evidence base and through SA/SEA/AA and demonstrate that the authority has not shied away from making the difficult decisions.</p>	<p>Accepted. The MWCS will be consistent with the PIMMs regime. The links between the components will be fully explicit in the interests of SMART implementation, monitoring and management.</p> <p>Accepted. The MWCS will contain full consideration of "contingency" and contingent arrangements.</p> <p>There will be a very robust evidence base in support of the MWCS.</p>
			<p>Glossary</p> <p>You may wish to add the likes of Appropriate Assessment, Highways Agency, Natural England.</p>	<p>Noted</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>GENERAL: ALL DPD's All DPD's - Self Assessment It is assumed that the Council will make use of the various existing and emerging Self Assessment templates and methodologies as part of the audit trailing and evidence gathering processes at all stages and for all its LDF documents. This will help all parties in the assessment of the soundness of the document in question and any underpinning processes by signposting the location and form of the Council's evidence base and reasoning. For example, the Council will need to demonstrate how it has taken into account the strategies and plans of other organisations (such as the emergency services and utilities) and how it has had regard to the requirements of the likes of the Civil Contingencies Act 2004 as they apply to the authority.</p> <p>Similarly the Council will need to demonstrate how it has taken into account other plans/strategies that affect the area; for example the existing and emerging district plans! LDFs, county M&W LDFs plans/strategies of major infrastructure/service providers etc.</p>	<p>Accepted.</p> <p>The MWCS Preferred Options will fully set out relationships with other plans/strategies.</p>
			<p>All DPDs - Purpose of DPDs At all stages DPDs must exhibit an appropriate degree of local distinctiveness. Thus your vision(s)/strategies! Policies/supporting text will need to exhibit a clear "BUCKINGHAMSHIRE" dimension and avoid being of such a general nature that they could apply to anywhere and everywhere. To avoid needing to either repeat or rewrite national or regional policy, the text can simply state that the Council operates a given, dated PPS or RSS policy and to assist plan users provide links to where the policy can be found. If the Council wishes to add to, or diverge from, the PPS or RSS policy on a given matter, it can then produce its own, together with the evidence base to support and justify the stance.</p>	<p>Accepted.</p> <p>Agreed. The MWCS Preferred Options will not duplicate advice already set out in national and regional policy.</p>
			<p>All DPDs - SMART Policies leading to effective Implementation, Monitoring and Management. Council's need to ensure that their policies and proposals are appropriately SMART (Specific, Measurable, Agreed, Realistic, Timed) in order to facilitate meaningful implementation, monitoring and management.</p>	<p>Accepted.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			All DPDs - Right Policies in the Right DPDs Authorities must avoid devolving key issues to later/ lower DPDs when decisions should be made earlier and more strategically, while also avoiding unnecessary duplication across DPDs.	The MWCS will make the appropriate strategic waste allocations. The Council considers that this is the appropriate level.
			All DPDs - Policy Wording - Neutrality When writing policies for inclusion in the Submission Document, please note that they should be written in the neutral rather than referring to "the Council".	Noted. However the Council is the Mineral Planning Authority (MPA) and the Waste Planning Authority (WPA). The County Council will therefore be the determining authority in almost all instances.
			All DPDs - Policy Wording - Concise and precise. Policies, when they are formulated in the Submission version of a DPD should avoid the use of phrases the meaning of which could be unclear, ambiguous, vague or imprecise.	Accepted.
			All DPDs - Spatial Planning & other regimes. The new plans system has a wider remit than its predecessor in that LDF documents should be Spatial Planning "spatial".	Accepted.
			All DPDs - Working with stakeholders. Council's should ensure that all DPDs are based upon the outcome of focussed, thorough and audit working with trailed liaison with all key stakeholders.	Accepted. The Council can show that it has worked closely with a number of stakeholders. In particular, it would cite Natural England, the Highways Agency, the Environment Agency, Waste and Minerals Operators.
			All DPDs - Policies, Evidence Base and Sustainability Appraisal - A Partnership. All DPDs should state, and be living proof, that new style LDFs are a partnership of clear, concise Policies, DPDs underpinned by a robust evidence base, tested through SA.	Accepted.
			All DPDs - " Living Lists" There are many parts of the evidence base that are likely to be periodically updated.	Accepted. Cross referencing to "parent" sources will be used, as appropriate.
			All DPDs - LDF Relationship Diagram To assist plan users, all DPDs should include a diagram akin to PPS12 Fig 1.1, to show the integrated and inter-related nature of the LDF and national/ regional policy.	Accepted. All Buckinghamshire LDF documents have included such a document. The MWCS Preferred Options consultation report will do so, as well.

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			<p>Sustainability Appraisal Report: GOSE has not received a copy of any of your early SA/SEA/AA work, but we trust that the other consultees who have a formal responsibility to comment on such work have had the opportunity to do so.</p>	<p>The MWCS Preferred Options consultation report will be supported by SA/SEA/AA work. This will be published.</p> <p>The Council has fully liaised with Natural England in respect of Appropriate Assessment.</p>
South Bucks District Council	400072	15	<p>Issue 1 -Plan period -The Waste DPD also covers the period to 2021. It is considered that the Plan should cover the period to 2021.</p>	<p>Noted, however, GOSE (see above) recommend that the timescale of all the DPDs should be compatible with the South East Plan which extends to 2026.</p>
			<p>Issue 2a -Spatial Vision -The Strategy needs to have regard to the Community Strategy, this is one of the requisite tests of soundness. All of the objectives are relevant, but those relating to conserving natural resources and enhancing the character of towns and countryside; waste minimisation; and balancing and integrating social, economic and environmental components are considered to be particularly relevant. The County Council is required to look at sustainability objectives and will need to undertake a sustainability appraisal. For waste, the spatial distribution of waste management facilities should reflect the spatial arising of waste. For minerals, the spatial distribution should ensure that an over concentration of minerals working in anyone locality is avoided, and the County Council and the strategy should encourage the minerals industry to actively explore those other parts of the county where resources exist, but where only limited extraction has taken place. It should encourage the industry and landowners to explore whether the viability of such resources has changed to the extent that they are viable now, or may be viable at some time during the plan period. As required by the National and Regional Guidelines for Aggregate Provision in England dated June 2003, the Core Strategy should be used to test the environmental acceptability of the apportioned supply, rather than to simply ensure that the apportioned supply of 0.99mt is met no matter what the social, economic and environmental consequences of doing so. This will be particularly important in Buckinghamshire, where until now it has been argued that there are few resources outside of the Inset Area (focused on South Bucks and the Thames Valley part of Wycombe) in the adopted Minerals and Waste Local Plan.</p>	<p>The MWCS Preferred Options consultation report will have full regard to the Community Strategy.</p> <p>The MWCS Preferred Options consultation report will have full regard to SA/SEA/AA.</p> <p>Noted.</p> <p>Noted. However, minerals can only be worked where they are found.</p>

Respondent Name/Organisation	Representation ID	Question Number	Response	BCC Comments
			<p>Issue 2b Objectives -W5 should be reworded to read "To ensure that the spatial distribution of waste management facilities is such that they are located close to the main sources of waste arisings emanating in Buckinghamshire, so that wherever possible they minimise the distances ". W6 should also refer to reducing the amount of waste that is imported into the county from elsewhere, so that it moves much closer to meeting the equivalent of its own waste needs. W8 and M7 should also refer not only to those who live and work in Buckinghamshire, but also to those who use it for recreation. It should also refer not merely to "appropriate protection" which sounds rather weak, but rather to "a high level of protection" since the quality of life of Buckinghamshire residents will be paramount. W9 and M8 should also refer to the environment as well as the natural and cultural heritage. Reference to ensuring that waste development does not increase flooding locally, and is not located in areas of higher flood risk might also be appropriate given recent events. The reference to viable deposits should be deleted from M1, since what may not be viable today may well be viable in say 10 years time. M2should refer to testing the ability of Buckinghamshire to meet the regional apportionment figure. M5 should refer to "appropriate" rail aggregates depots, both existing and new ones.</p>	<p>Noted. Thank you for the comments. The MWCS Preferred Options consultation report will contained revised (Strategic) Objectives for the Minerals & Waste Development Framework.</p>
			<p>Issue 3 Supply of aggregate for future growth - Buckinghamshire should not seek to be self sufficient in the supply of aggregates in order to meet the demand for aggregates that emanates from the northern parts of the county. To do so, would, notwithstanding the comments made in response to issue 2a, be likely to involve a significant transportation of primary aggregates from the extreme south of the county to the growth areas in the northern parts of Buckinghamshire. The National and Regional Guidelines for Aggregate Provision in England, together with Regional Planning Guidance/Regional Spatial Strategy, requires that the County seeks to test whether it can meet the requirement of 0.99mtpa in Buckinghamshire. The Plan should not seek to make provision for primary aggregates from Buckinghamshire in excess of this. The approach should be one that is based on identifying sites/granting permissions for extraction close to the areas where the demand will arise (e.g. the</p>	<p>The cost of aggregate dictates that is uneconomical to transport the material more than about 25 miles. This means that the aggregate from south Buckinghamshire can travel north to around Aylesbury but not further. To alleviate the problem of meeting need for the growth areas, the County Council will attempt to identify rail depots in central and north Bucks as the most sustainable option.</p> <p>These comments are noted and will inform the development of the Preferred Options exercise.</p>

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			<p>main growth areas in Bucks), but it should also seek to ensure that the transportation infrastructure, particularly in the form of rail, is provided to enable other material to be imported. Clearly there should also be a strong emphasis on ensuring that the maximum use is made of secondary and recycled aggregates.</p>	
			<p>Issue 4 Safeguarding of mineral resources -all sand and gravel resources should be safeguarded, not merely those that are currently proven to be viable or currently proven. The economics of viability may change over time and I some of the smaller deposits elsewhere in the county may become more viable in the future. However, it is considered that Minerals Safeguarding Areas should not cover land that would never be acceptable for extraction, for example because it is immediately adjacent to areas of residential development. There should be no question of the County Council compromising the sustainability objectives that it has set itself.</p> <p>Of the sustainability objectives listed:</p> <ul style="list-style-type: none"> • The least important are: • SA 20 to protect, enhance and create resources valued for recreation, including public rights of way; • SA7 to conserve soil resources and quality • The most important are: • SA4 to minimise the adverse impacts on human health ; • SA3 to protect the living conditions and amenities of local residents from the adverse effects of mineral and/or waste development; • SA16 to minimise the impacts of minerals and waste traffic on residents, communities and the environment. 	<p>National policies for minerals planning require MPAs to “define Mineral Safeguarding Areas (MSAs) in LDDs, in order that proven resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked” (1st bullet point of Paragraph 13). The 4th bullet point in Paragraph 13 states that “in two-tier planning areas, include policies and proposals to safeguard mineral resources within MSAs in county LDDs and show MSAs in district LDDs”. National guidance does not require the safeguarding of resources for only the plan period but all proven resources. The DPD conforms with national guidance in respect of the safeguarding of minerals and confirms that only proven resources should be included in these documents.</p> <p>Noted. The SA supporting the MWCS Preferred Options consultation report will contain revised and improved sustainability objectives.</p>
			<p>Issue 5 Alternative Aggregates Provision -The County Council should lobby SEERA to seek a reduction in the apportionment of land won primary aggregates if construction and demolition recycling targets are met. It should also work jointly with the District Councils to encourage construction and demolition re-use/recycling facilities in conjunction with new large scale planning applications for the recycling of construction and demolition waste. It is considered that there should be a range of sites, based around the principle of permanent sites being in locations outside of the Green Belt; with only temporary facilities in the Green Belt on sites which are subject to</p>	<p>The County Council lobbies SEERA together with other South East MPAs at every opportunity of reducing land won primary aggregate apportionments if alternative aggregate apportionments are met. It will continue to take this approach.</p> <p>The support for this approach is welcomed although it has to be pointed out that in line with the proximity principle, in some circumstances, it may involve the development of permanent facilities in the Green Belt. If this is not an</p>

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			<p>mineral extraction or infilling, and then only until such sites are restored. However, it will be essential that the impact of vehicle movements on the locality and in particular on local communities are a major factor to be taken into consideration, and indeed this may indicate that some sites within the area excluded from the Green Belt are not acceptable.</p>	<p>option then increased vehicle movements to facilities outside the Green Belt may have a detrimental effect on local communities.</p>
			<p>Issue 6 Landfill -Void space should be carefully husbanded in order to meet future needs for that material which can only be dealt with by landfill, thus minimising the need for further landfill sites to be identified in the future. The emphasis should be on reducing the amount of waste which remains to be disposed of in landfill.</p>	<p>Agreed. Comment welcomed.</p>
			<p>Issue 7 Hazardous waste -If Calvert were to be licensed for hazardous waste, that may well mean that the overall void space at Calvert would be used up earlier(as it would be able to take hazardous and non-hazardous), resulting in pressure for the identification of new landfill voids at an earlier date than would currently be the case. Accordingly, the County Council should adopt the strategy of seeking to export hazardous waste.</p>	<p>The consideration of hazardous waste will take place in a later stage of the Waste DPD. This will be able to take advantage of work being undertaken at the regional level.</p> <p>There will be a regional and sub-regional dimension to provision for hazardous wastes because it is unlikely that any WPA will be able to accommodate the full range of such wastes.</p> <p>Even if such a cell were to be developed at Calvert, it would be restricted in the hazardous wastes it could manage. Some hazardous wastes would still fall to be exported from the county.</p>
			<p>Issue 8 -protection of designated environmental sites - MPG6 and the National and Regional Guidelines for Aggregate Provision in England make it clear that the Core Strategy should be used to test the environmental acceptability of the apportioned supply. The local designations outlined in paragraph 9.7 of the consultation paper are important to the environmental quality in Buckinghamshire. Accordingly, the County Council should take the approach that these areas are not to be compromised, and it should not look to these areas if the apportionment (0.99mtpa) cannot be met without breaching them. There is no reason why "airfields in current use" should be regarded as an environmental asset, and accordingly this should be deleted. If, however, the County Council were to take the approach that the</p>	<p>The County Council aims to avoid identifying mineral extraction sites in locally important environmental areas whenever possible. However, it welcomes the views of the District Council that if there is a need to breach a designation, then the County Council should first consider AALs. The BGS reports did not specifically identify areas of viable deposits of mineral in north and central Buckinghamshire. Words were used in the reports such as "intermittent" and "sporadic" which suggests that the surveys revealed unreliable deposits of viable mineral. This fact was acknowledged by the Inspector at the 1991 Inquiry who concluded that "northern and central Buckinghamshire will not provide a significant source of acceptable sand and gravel reserves in which case BCC would be obliged to find additional sites in</p>

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			<p>apportionment must be met, and that to do so would involve breaching one or more of the other designations (in addition to airfields), then the County Council should look first at Areas of Attractive Landscape as opposed to the other designations. This would enable the County Council to consider those locations with minerals deposits located in all parts of the county, including those in the AALs in mid and north Bucks. Notwithstanding this, it would still be essential to ensure that there were not an over concentration in South Bucks (see issue 2a above).</p>	<p>southern Buckinghamshire” (paragraph 109) and in paragraph 218, “It is clear that the major part of BCC’s apportionment of land-won sand and gravel will come from the south of the county”. If the District Council has knowledge of potential mineral extraction areas in northern and central Buckinghamshire, then it would be helpful if they could make them known to the County Council. To date, the County Council is not aware of any interest or proposals from mineral operators for possible extraction sites in this area of Buckinghamshire which confirms the views of the BGS, the County Council and the Government Inspector.</p>
			<p>Issue 9 Amenity -It is too simplistic to suggest that the County Council should consider amenity criteria differently on whether an operation/facilities are temporary or permanent. Minerals extraction is always temporary, but there are some sites that may be temporary for say 5-10 years, whilst others may be temporary for say 40-50 years. It would be inappropriate for them to be treated exactly the same way as each other. The Plan, and development control decisions should take account of this fact. Policies on the protection of amenity need to have regard to the period over which an impact is experienced; to the level (amount) of impact; to the nature of the uses/environment that is subject to that impact; and to the effect of that impact. The more important impacts are those which may have a safety impact such as gasses and fumes; whilst birds might be the least important generally (although they may be extremely important in areas near to aircraft flight paths due to the potential for bird strike).</p>	<p>Accepted.</p>
			<p>Issue 10 Buffer Zones -The Core Strategy should continue to set out indicative minimum buffer distances. However, the issues and options document refers to them as "indicative buffer distances", whereas the adopted Minerals and Waste Local Plan makes it clear that they are "indicative minimum distances". The existence of a buffer zone though, must not be taken to imply that minerals/waste operations/development which meets the buffer distance will necessarily be suitable and acceptable, as clearly that will depend upon a whole range of other factors, including the issue of amenity outlined above. The provision of a buffer distance will not necessarily mean that</p>	<p>Nowhere in the adopted Minerals and Waste Local Plan does it refer to “indicative minimum distances”. Indeed, Supplementary Planning Guidance Note 7 of the Local Plan explains why there must be flexibility in the application of buffers to new development.</p> <p>Agreed</p>

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			all amenity considerations are resolved by the provision of that buffer. Whilst a buffer will assist to some extent, those amenity considerations can only be satisfactorily addressed by detailed consideration of the factors outlined above. The distances in tables 6 and 7 should not be reduced, and should be treated as minimum distances.	Agreed Disagree for the reasons given in SPG Note 7.
			Issue 11 Transportation of waste -Sites for the development of waste management facilities should be located in close proximity to the main sources of waste arisings. The co-location of a number of waste management operations on one site would remove the necessity for waste to travel between two different sites for treatment and disposal. However, that benefit is more than cancelled out if that waste has to travel by road over long distances to get to the site. Priority should be given to sites that are located where they are more proximate to the source of the waste, even if they are not accessed directly from the Strategic Highway Network. Transporting wastes over longer distances would generally cause more harm. It would mean that a wider area and a greater number of people are subject to noise, vibration and fumes.	The Council generally accepts this point on the relationship between proximity, arisings, and co-location. The carriage of waste is also an important consideration. These considerations also relate well to the number and location of suitable sites within the county. It is also important to acknowledge deliverability as a factor.
			Issue 12 -Restoration and aftercare -Restoration should be to a use that will provide positive benefit to the character of the local area and to the community. This may be restoration to another use different from the original use (often agricultural), although in many cases it may be to the original use. However, it is essential that the restored use is a viable and sustainable one. Restoration to a recreational use would be unlikely to be appropriate, if there was a likelihood that it would not be viable without public subsidy, or if it were likely to need some built development at a future date where that site was within the Green Belt and such development would be contrary to Green Belt policy. Where land is to be restored to agricultural use, the aims should be to restore it to as high a grade as possible. Where land has not been fully and properly restored, the County Council should seek to use all of the powers, at its disposal, including negotiation, to secure full and final restoration. However, development that would be contrary to policy (e.g. Green Belt policy) should not be permitted in order to seek to secure restoration. Other possible viable economic uses could be considered provided that they are not contrary to policy.	Agree Agree Agree Agree

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			<p>Also, where such sites are owned by operators seeking permission for new sites, the County Council should seek to secure planning gain by securing the full restoration, as long as the new site was in full accordance with the policies in the Plan. The local community should have a say as regards the restoration and final use, as this will clearly affect the locality for the foreseeable future.</p>	
			<p>Issue 13a Planning obligations -It will be essential to ensure that sites are properly restored. Accordingly, it will be essential that the County Council seeks sufficient information from all applicants (not just those with a poor past record) to minimise the risk of restoration not being completed. For the same reason, it should also, when granting permissions, favour operators belonging to a well-established industry scheme that guarantees restoration.</p>	<p>The County Council agrees with these comments.</p>
			<p>Issue13b Developer contributions-The paper raises the question as to whether the County Council should seek to secure financial contributions towards waste minimisation/waste processing facilities from non-waste development by negotiation or through encouraging policies in District LDDs. Given that the County only deals with waste, minerals and its own developments, it is difficult to see how it could secure contributions itself towards waste management facilities. The District Core Strategy is intended to include an enabling policy that would allow developer contributions to be sought where these can be justified in accordance with Government guidance.</p> <p>However, current guidance has stringent tests and it would be necessary for the County to undertake a further study in this connection. Given the impact of minerals and waste operations on the landscape and local environment, which have in some cases resulted in land being damaged, it is considered that the County Council should consider whether it is able to secure contributions in anyway to assist with the restoration of damaged land, particularly where it is in close proximity to an application site, or where the damaged land was worked by the same operator who is now seeking a new permission.</p>	<p>Noted.</p> <p>This is welcomed.</p> <p>The Council proposes to produce an appropriate Supplementary Planning Document.</p>
			<p>Issue 14 Annual Monitoring -The Annual Monitoring Report should include targets that relate to both the delivery of the</p>	<p>Comment welcomed.</p>

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			<p>policies themselves, and also to the impacts of development on sustainability objectives. There may be some benefit in joint working here since the District Council's developed their LDF sustainability criteria jointly with the County Council - the County needs to check what information is already available within District AMRs.</p>	
Bickerton's Aerodromes Ltd	400073	15	<p>I am responding on behalf of Bickerton's Aerodromes Ltd, the operator of Denham Airport. Denham Airport is licensed by the Civil Aviation Authority and has been in operation continuously for more than seventy years. Denham Airport provides facilities for General Aviation including business aviation.</p> <p>Question 8 -In meeting the needs of the County and continuing to protect the environment of Buckinghamshire should the County Council: (i) look to locally important environmental areas if it is the last possible option for mineral and/or waste development:</p> <p>No. Important environmental areas should not be dug up.</p> <p>There are only three licensed aerodromes in Buckinghamshire. In common with the other important environmental areas listed they are facilities which could not be replaced.</p> <p>Question 12 (vi) -Are there further considerations the County Council should apply in developing policy for the restoration and aftercare of such sites:</p> <p>In respect of Question 12 (vi) the Council's attention is drawn to Circular 1/2003 (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Annex 2 in relation to the danger of birdstrikes:</p> <p>"7. Birdstrikes are one of the major controllable hazards to aviation....</p> <p>8. The primary aim is to guard against new or increased hazards caused by development. The most important types of development in this respect are: facilities intended for household or commercial wastes... Mineral extraction</p>	<p>Noted.</p> <p>The comment is noted and will be taken into account when formulating policies for inclusion in the MWCS Preferred Options consultation report.</p> <p>Noted</p> <p>The County Council is aware of Circular 1/2003 and consults with the appropriate organisations with regard to LDDs and planning applications.</p> <p>These comments are noted and will be taken into account.</p>

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			<p>and quarrying can also create a bird hazard .</p> <p>13. Operators of licensed aerodromes ... should take steps to protect their locations ...[the Civil Aviation Authority recommends that] aerodrome licensees lodge a non-official safeguarding map with the local planning authority ...The general advice in this Annex is applicable to nonofficially as well as officially safeguarded aerodromes..."</p> <p>In accordance with Circular 1/2003 the airport operator has deposited safeguarding maps for Denham Airport with the County and all Local Planning Authorities which lie within the Aerodrome Traffic Zone i.e. 2nm radius from the airport.</p> <p>The existing Buckinghamshire Minerals and Waste Local Plan includes Policy 31 Restoration and Aftercare. We believe that the Council should retain Policy 31 and also that Denham Airport should be included in Policy 31.</p> <p>The Council's attention is drawn to Central Government policy and advice which supports General Aviation. PPG13 states:</p> <p>"6. ., local authorities should ... avoid development at or close to an airport or airfield which is incompatible with any existing or potential aviation operations."</p> <p>In order to protect the safety of aviation operations we encourage the Council to take an approach consistent with that of the South Bucks District Council. SBDC Local Plan (adopted 1999) includes policy EP17 -Aerodrome/Air traffic safeguarding which states:</p> <p>"The District Council will not permit development which would interfere with the safe operation of an aerodrome or with the movement of air traffic over the District."</p> <p>In order to protect the safety of aircraft, pilots and passengers flying from Denham Airport we recommend the Council have a policy to consult the operators of civil and military aerodromes in the event of developments which</p>	<p>Noted</p> <p>The County Council is aware of these safeguarding maps.</p> <p>These comments are noted and will be taken into account.</p> <p>The County Council has saved all the policies in the Minerals and Waste Local Plan, including Policy 34 (Aviation Safeguarding Areas). All the policies contained in the Local Plan will be replaced by April 2011 when the last</p>

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			may attract birds.	of the new DPDs (the Waste DPD) is adopted.